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December 23, 2025

Diane Cutler  
Idaho Department of Environmental Quality  
1410 N. Hilton St.  
Boise, ID 83706  
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**Subject: Cyanidation Rule Public Comment: Docket No. 58-0113-2502**

Ms. Cutler,

Thank you for the opportunity to comment on Rule Draft 1 for IDAPA 58-0113-2502 – Rules for Ore Processing by Cyanidation.

Revival Gold has reviewed Rule Draft 1 and find that there are three areas of concern:

1. Idaho Code 39-118A limits the design requirements for cyanidation permitting to secondary containment of cyanidation pollutants associated with process equipment and to primary and secondary liner systems associated with tailings storage facilities, heap leach pads and cyanide solution ponds. Rule Draft 1 should be amended to eliminate requirements for data and analysis that goes beyond the requirements of the statute.
2. The Rule should be revised to be consistent with the intent of Idaho Code 39-118A, which avoids reviews that duplicate reviews required by other permits. The Rule should only include the cyanidation permit requirements that are not addressed by other state and federal permits.
3. The Rule should very clearly define the information or level of detail required for the cyanide permit application versus the information required in the Issued for Construction data package. Please consider adding a section in the Rule to address the requirements for each submission.

Respectfully,

John Meyer,  
President, Revival Gold (Idaho) Inc.