

Scanned and Profiled to all Perpetua (Stibnite Gold Project) Water Right Files in Basin 77.

SGP 2025 Annual Report Comment Table\_IDWR.xlsx



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Cc [Novak, Shilynn](#)



SGP 2025 Annual Report Comment Table\_IDWR.xlsx  
18 KB

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| 77 | 7122  |
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| 77 | 7285  |
| 77 | 7293  |
| 77 | 14377 |
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| 77 | 14379 |
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Summarize

Reply
 Reply All
 Forward

Wed 6/24/2026 4:49 PM

Hi Todd,

Please see the attached comments on the 2025 Annual Report.

As the project progresses into construction, IDWR anticipates providing additional comments on future reports. While this year's comments were primarily focused on water-right-related issues, future comments may address activities and requirements associated with other IDWR programs, including the Stream Channel Alteration Program, Dam Safety, and well drilling, as those project components move forward.

Please let me know if you have any questions.

Thanks,

Manuel

| Document                                    | Section | Page Number | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|---------------------------------------------|---------|-------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Appendix B<br>- PRII-2025<br>WR<br>Memo.pdf | general | general     | <p>Water right condition text: On or before March 1st each year, the right holder shall provide the Department with an annual report summarizing the diversion amounts and flow rates for the previous calendar year. The annual report shall include the following information: (1) the daily diversion rates for the river pump and ground water diversions (industrial supply, dewatering, open pit, underdrain); (2) daily streamflow rates for (a) Meadow Creek just above the confluence with Blowout Creek, (b) Meadow Creek just above the confluence with EFSFSR, and (c) EFSFSR at the entrance to the fishway tunnel downstream of the river pump on the EFSFSR; (3) an analysis of how the right holder complied with the U.S. Forest Service Stipulation and mitigation plan; and (4) an analysis of how the right holder satisfied the conditions of approval for this water right. <b>While the condition requires reporting daily diversion rates rather than specifically referencing maximum instantaneous diversion rates, the annual report should include information sufficient to evaluate compliance with the authorized rate of diversion. Because water rights are generally limited by a maximum diversion rate (cfs) and (if applicable) an annual diversion volume (acre-feet), the report should include the maximum instantaneous diversion rate observed during the reporting period. Average diversion rates can be readily calculated from the reported daily diversion data and annual diversion volumes.</b></p> <p><b>No revisions to the 2025 annual report are necessary. Given the early stage of project development, the information submitted is sufficient to satisfy the reporting condition for this reporting period. However, beginning with future annual reports, the right holder should include the maximum instantaneous diversion rate observed during the reporting period for each water right subject to reporting. This information will help the Department evaluate compliance with the authorized rate of diversion and the conditions of approval.</b></p> |

|                                             |                 |         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|---------------------------------------------|-----------------|---------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Appendix B<br>- PRII-2025<br>WR<br>Memo.pdf | 4A &<br>general | general | Industrial wells in Section 15, T18N, R09E shall not exceed a combined monthly diversion volume of 31 acre feet. – Combined monthly groundwater diversion for November was 0.16 acre feet. <b>The response does not fully address Condition 4a. While it reports a combined groundwater diversion of 0.16 acre-feet for November and indicates that diversions were well below the 31 acre-foot monthly limit, it does not address compliance for the remainder of the reporting period. No revisions to the 2025 annual report are necessary given the limited duration of project operations during the reporting year. However, future reports should directly address each condition and clearly explain how compliance was achieved throughout the reporting period. Also, in general, qualitative statements such as "well below" or "nowhere near" a diversion limit should be accompanied by the applicable limit and the corresponding measured or estimated diversion volume.</b>                                                                                                                                                                                                                                                                                                                                       |
| Main<br>Annual<br>Report                    | 2.4             | 2-6     | <b>The reported average diversion rates and total diversion volumes do not fully address compliance with water right rate limits, which are based on maximum diversion rates rather than averages. Future reports should include the maximum instantaneous diversion rate observed during the reporting period for each diversion source.</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Main<br>Annual<br>Report                    | 2.4/6           | general | <b>Qualitative statements such as "minor utilization", "far below", etc should be supported by the applicable water right limit and the corresponding maximum instantaneous diversion rates so that compliance can be readily evaluated.</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| General                                     | general         | general | <b>A good example of why the maximum instantaneous diversion rate should be reported is the project's domestic water rights associated with the worker housing facility. One of the conditions of Permit No. 77-14377 states:<br/>"Rights 77-7141 and 77-14377, when combined, shall not exceed a total diversion rate of 0.20 cfs and a total annual diversion volume of 28.0 acre-feet."<br/>The project may increase worker housing occupancy from approximately 500 to 1,000 people. Regardless of occupancy, the combined water rights authorize a maximum instantaneous diversion rate of 0.20 cfs and a maximum annual diversion volume of 28.0 acre-feet. Compliance with this condition is determined by whether those rate and volume limits are exceeded, not by the average daily diversion rate.<br/>While average daily diversion rates may be reported for informational purposes, they are not necessary to demonstrate compliance with the permit. Reporting the maximum instantaneous diversion rate and total annual diversion volume is necessary to verify that the authorized limits have not been exceeded. If future water demands require a higher diversion rate or greater annual volume, Perpetua would need to obtain additional water rights or modify its existing water right authorizations.</b> |