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February 21, 2012

Nevada Division of Environmental Protection
Bureau of Corrective Actions
901 S. Stewart Street, Suite 3005
Carson City, Nevada 89701-5249

VIA: Electronic Mail

ATTN: Jack Yates

CC: Cindi Byrns (Comstock), Joe McGinley (MGA), Carolyn McIntosh (Patton Boggs), David Friedman (NDEP), Jeff Collins (NDEP)

RE: ADDENDUM #2 TO THE COMSTOCK MINING INC. SAMPLING AND ANALYSIS PLAN

Dear Mr. Yates:

On behalf of Comstock Mining Inc. (Comstock), McGinley and Associates (MGA) is providing this addendum to the NDEP-approved Sampling and Analysis Plan (SAP) dated January 25, 2012 in response to NDEP's February 15, 2012 letter. Activities will be conducted per the NDEP-approved SAP as modified below.

The attached Figures 1 and 2 show locations where Comstock proposes to collect additional samples; these locations are represented by the "Addendum #2 5-point Composite Sample" symbol as shown on the legend of the figures. There are a total of 41 sample locations. These locations represent areas where Comstock would like to install geotechnical or exploration borings in the future. In addition, samples were placed on the existing roadways to provide coverage between geotechnical and exploration borings. MGA will collect a 0-6" below ground surface (bgs) 5-point composite sample from each location as it is expected that these are the materials to be disturbed by the drilling activities.

Also shown on these Figures are "In Pit Sample" locations and "Proposed CRMS Sampling Locations". These locations were per the SAP and samples have already been collected at these locations. Prior to requesting the authorization to drill the geotechnical and exploration borings, Comstock will present all of the analytical data to the NDEP in a report.

In addition, per discussions with the NDEP, Comstock intends to collect samples of ore body materials during the installation of the geotechnical and exploration holes. These samples will be collected from areas identified as ore bodies by a Comstock geologist.

Regarding NDEP's comment #4, and NDEP's request to provide additional sampling in the Dayton Area, Comstock is currently preparing these figures and will respond to NDEP under separate cover as this issue is geographically isolated from the Addendum #2 area of interest.

Regarding NDEP's comment #5, Comstock has provided the requested geodatabase via electronic mail on February 21, 2012.

McGinley and Associates, Inc. appreciates the opportunity to submit this addendum and we look forward to working with you on this project. Should you have any questions regarding this addendum, please contact us at (702) 260-4961 or at brakvica@mcgin.com. If this request is acceptable to you, please advise us at brakvica@mcgin.com.

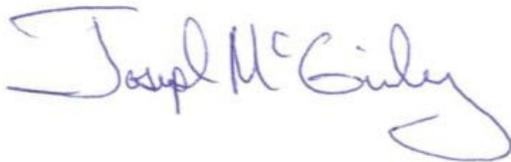
Respectfully submitted,
McGinley and Associates, Inc.



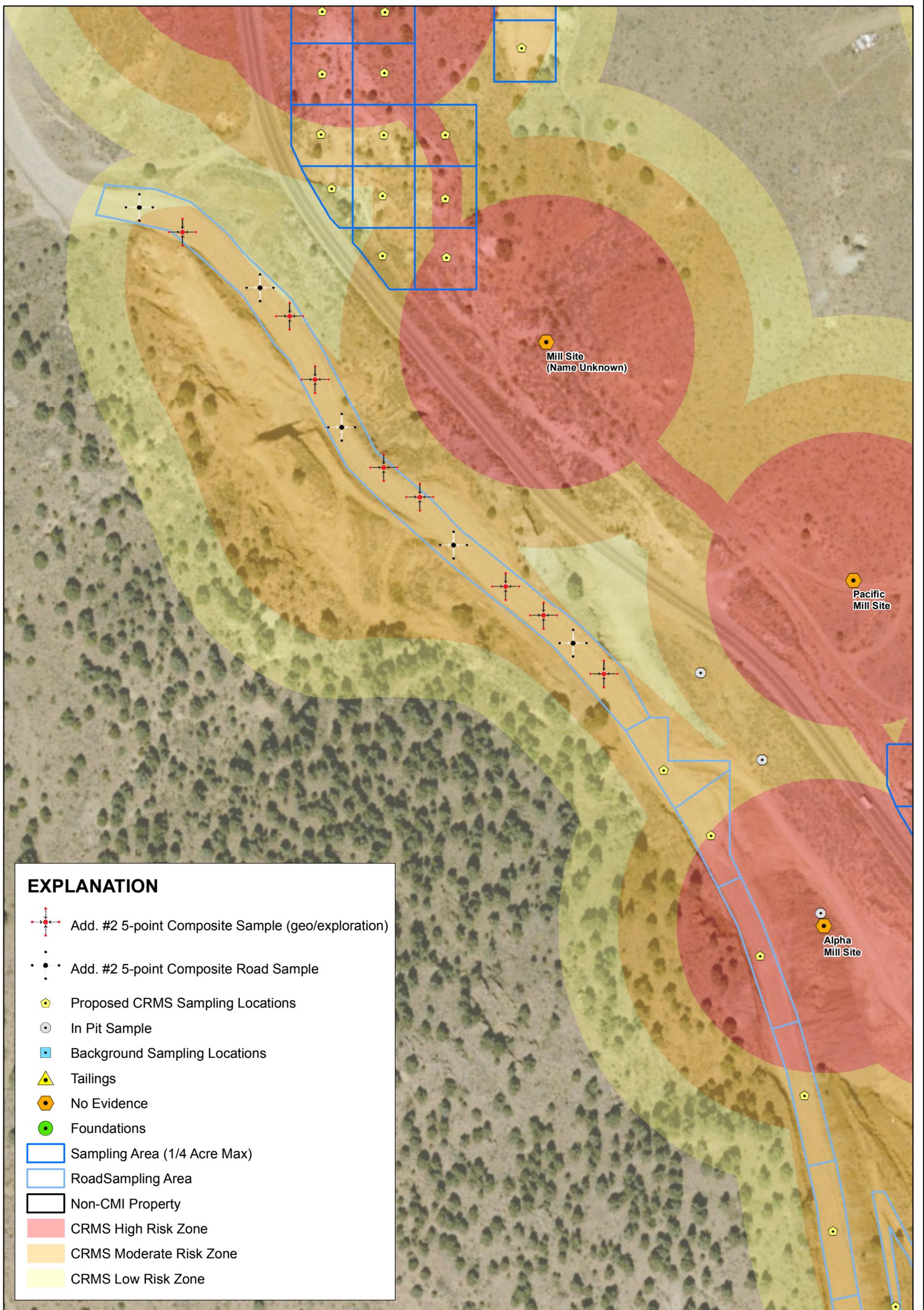
Brian A. Rakvica, P.E., C.E.M. #2260, Exp. Date 09/21/12
Senior Project Manager

Reviewed by:

I hereby certify that I am responsible for the services described in this document and for the preparation of this document. The services described in this document have been provided in a manner consistent with the current standards of the profession, and to the best of my knowledge, comply with all applicable federal, state and local statutes, regulations and ordinances.



Joseph M. McGinley, C.E.M. #1036, Exp. Date 11/12
Principal



EXPLANATION

-  Add. #2 5-point Composite Sample (geo/exploration)
-  Add. #2 5-point Composite Road Sample
-  Proposed CRMS Sampling Locations
-  In Pit Sample
-  Background Sampling Locations
-  Tailings
-  No Evidence
-  Foundations
-  Sampling Area (1/4 Acre Max)
-  RoadSampling Area
-  Non-CMI Property
-  CRMS High Risk Zone
-  CRMS Moderate Risk Zone
-  CRMS Low Risk Zone

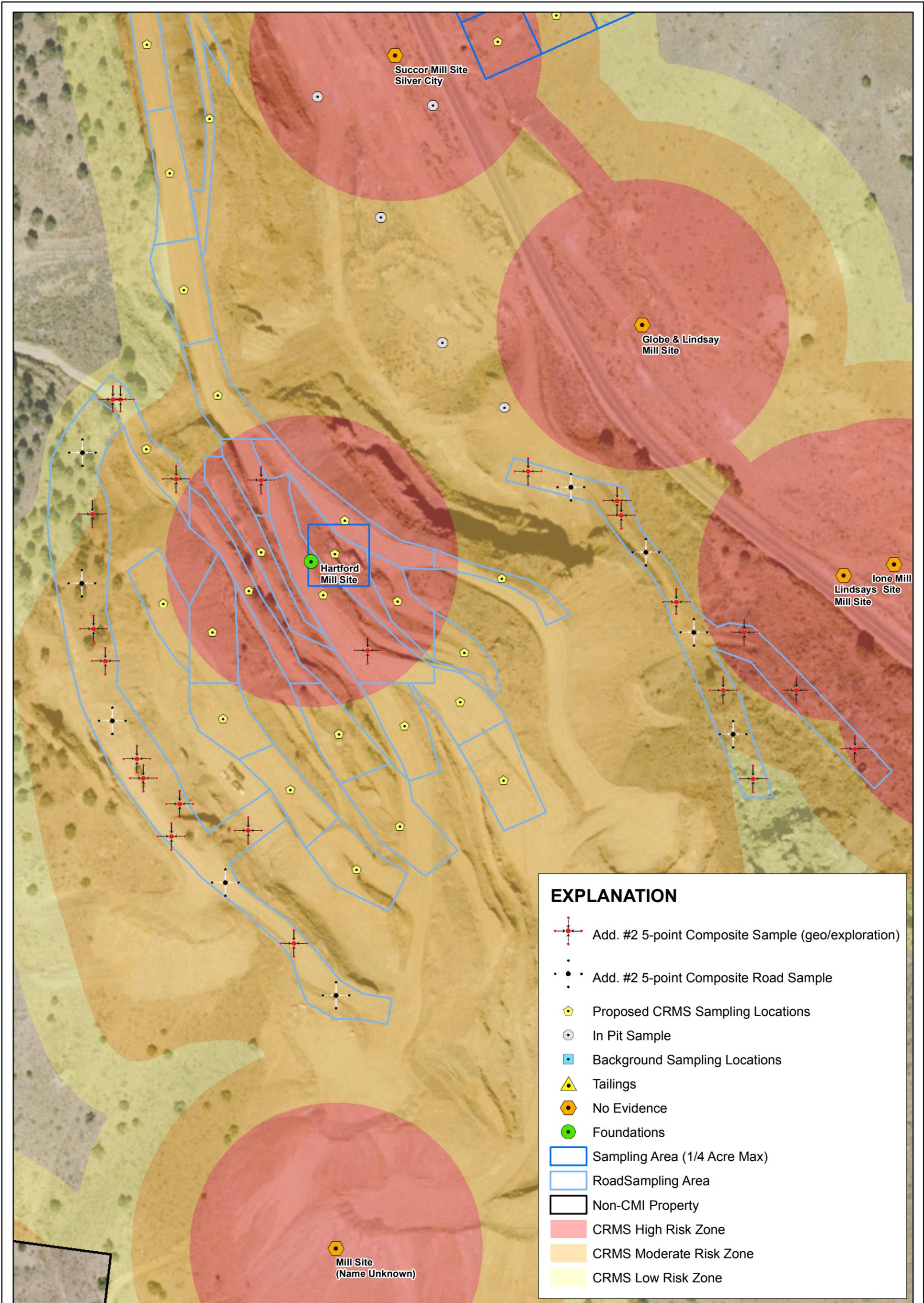


Comstock		
DESIGN: -	DRAWN: BCH	REVIEWED: -
SCALE: 1 inch = 150 feet	DATE: 2/21/2012	
FILE: CRMS_Lucerne_Proposed_Fig1_20120221_BCH.mxd		

DRAWING TITLE:

Proposed Lucerne Drill Holes

Comstock Mining, Inc.	
CRMS Sample & Analysis Plan	
ISSUED FOR: -	
DRAWING NO. Figure 1	REVISION NO.
SRK JOB NO. 360000.020	A



EXPLANATION

-  Add. #2 5-point Composite Sample (geo/exploration)
-  Add. #2 5-point Composite Road Sample
-  Proposed CRMS Sampling Locations
-  In Pit Sample
-  Background Sampling Locations
-  Tailings
-  No Evidence
-  Foundations
-  Sampling Area (1/4 Acre Max)
-  RoadSampling Area
-  Non-CMI Property
-  CRMS High Risk Zone
-  CRMS Moderate Risk Zone
-  CRMS Low Risk Zone



COMSTOCK MINING INC
Revitalizing the Comstock

Comstock

DESIGN: -	DRAWN: BCH	REVIEWED: -
SCALE: 1 inch = 150 feet	DATE: 2/21/2012	
FILE: CRMS_Lucerne_Proposed_Fig2_20120221_BCH.mxd		

DRAWING TITLE:
Proposed Lucerne Drill Holes

Comstock Mining, Inc.
CRMS Sample & Analysis Plan

ISSUED FOR: -	
DRAWING NO. Figure 2	REVISION NO.
SRK JOB NO. 360000.020	A

PATH: H:\Comstock Mining Inc\360000.020_Engineering Consulting\040_Drafting\Task_0207_SCP\CRMS_Lucerne_Proposed_Fig2_20120221_BCH.mxd