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WORK PLAN FOR FILL REMOVAL AND MITIGATIVE MEASURES, GOLD CANYON CREEK AREA

Comstock Mining Inc.
Gold Hill, NV

Prepared for:

Comstock Mining Inc.
1200 American Flat Road
Gold Hill, Nevada

June 7, 2012

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Table 1 Data Summary for Areas Adjacent Limestone Fill

FIGURES

Figure 1 Project Location
Figure 2 Gold Canyon Creek – Soil Concentrations – Arsenic, Lead and Mercury

1. INTRODUCTION AND EXECUTIVE SUMMARY

McGinley and Associates, Inc. (MGA) has prepared this Work Plan to summarize pertinent assessment activities to be conducted at the Comstock Mining Inc. (Comstock) site located in Gold Hill, Nevada and to propose removal measures to address limestone fill materials placed in a waterway in the Gold Canyon Creek Area of Storey County, Nevada.

This Work Plan addresses a specific area of the Comstock site (Site) that the Nevada Division of Environmental Protection (NDEP), Bureau of Corrective Actions (BCA) identified as a potential risk zone within the Carson River Mercury Superfund site (CRMS), due to the proximity of historic mill sites. The potential risk zone includes the Globe & Lindsay; Lindsays; Ione; Saint Louis; Chanens; Ransoms; and Boston Mill Sites. The approximate locations of these areas are shown on the attached Figure 2. Within this area, the focus of this Work Plan is more narrow.

This Work Plan focuses on the limestone fill materials that were placed in a waterway near the Globe & Lindsay and Lindsays Mill Sites. This Work Plan also discusses the analytical data from the top 6" of soil in the areas adjacent the limestone fill materials. This Work Plan also includes our recommended actions required to remove these materials and the related geotextile below these materials.

The limestone fill materials consist of clean fill imported from an off-site source and placed on geotextile fabric installed on top of native soils. In this manner it is believed that these materials have not been impacted by CRMS materials. To be abundantly cautious, Comstock has evaluated the surface soils adjacent to the limestone materials consistent with the NDEP-approved Sampling and Analysis Plan (SAP). These results are discussed below.

The fill materials were placed to stabilize the slopes of the waterway and to construct a temporary access road to allow for mining exploration activities to occur. This Work Plan is a follow up to the February 10, 2012 letter that Comstock provided to the United States Army Corps of Engineers (USACE). That letter explained the characterization activities that were planned prior to removal of the clean fill materials. This Work Plan details the results of the characterization activities and plan to remove the fill materials.

The sampling that was conducted adjacent to these fill materials was proposed in Comstock's Addendum #5 which was submitted to the NDEP on March 7, 2012 and approved by the NDEP on March 7, 2012.

The investigations and analyses indicated no exceedances of the NDEP's Screening/Action Levels for lead or mercury in the top 6" of soil. In addition, the top 6" of soil did not exceed NDEP's elevated ore zone ceiling level for arsenic.

Arsenic, however, exceeded NDEP's Screening/Action Level at most locations. Based upon comments provided by NDEP dated May 4, 2012, NDEP suggested a tiered approach to classifying materials. NDEP believes that the range of site-specific background concentrations within an ore zone for arsenic are from 0 – 90 mg/Kg and as high as 131 mg/Kg in select

instances. All materials within this area are below these screening criteria, hence are not CERCLA-regulated and are health-protective.

1.1 Site Name

Comstock Mining Inc.

1.2 Site Location

The Site includes portions of Storey and Lyon Counties in Nevada as shown on Figure 1. The relevant portion of the Gold Canyon Creek Area is shown on Figure 2.

1.3 Responsible Agency

This project is being conducted for the United States Army Corps of Engineers (USACE) and for the NDEP through the BCA Superfund Branch.

1.4 Project Organization

Title/Responsibility	Name	Phone
Comstock		
Director of Environmental and Regulatory Management	Cindi Byrns	(775) 847-5272
USACE		
Regulatory Program Manager	Kristine Hansen	(775) 784-5304
NDEP		
Program Coordinator for BCA Superfund Branch	Jeff Collins	(775) 687-9381
Case Officer – Review SAP, quality assurance	Jack Yates	(775) 687-9547
Case Officer – Review SAP, quality assurance	David Friedman	(775) 687-9385
McGinley and Associates, Inc. (Contractor to Comstock)		
Principal – Senior review, regulatory liaison	Joe McGinley	(775) 829-2245
Project Manager – Project management, regulatory liaison, coordinate field activities, data review, report preparation.	Brian A. Rakvica	(702) 260-4961
Quality Manager – Oversee implementation of SAP, review QA/QC procedures, data validation.	Brian Giroux	(775) 829-2245
Environmental Scientist – Conduct sampling activities	Doug Parcells	(775) 829-2245
CAD Operator – CAD support	Tim Dory	(775) 829-2245
Administrative Assistant – Administrative support	Linda Comstock	(775) 829-2245
Contractors/Vendors		
Columbia Analytical Services – drying, sieving and laboratory analysis of soil samples	Howard Holmes	(360) 501-3364

Castaway Trash Hauling – disposal of investigation-derived wastes	Jay Gardner	(775) 342-2444
Neptune and Company, Inc. – validation of data.	David Gratson	(505) 662-0707
Cascade Drilling – drilling services	Paul Snelgrove	(916) 638-5611

1.5 Statement of the Specific Problem

NDEP issued a cease and desist order by letter to Comstock on May 11, 2011 because Comstock was alleged to be placing dirt and rock in the ephemeral Gold Canyon Creek drainage. Comstock has disputed these allegations. Nonetheless, under order from NDEP, Comstock applied for and was issued a Temporary Working in Waterways permit (TNEV2001453) on June 6, 2011. Under the permit, Comstock placed a geotextile and clean riprap in the waterway crossing of the ephemeral Gold Canyon Creek. The geotextile and riprap functioned as a temporary access road crossing for mining and/or exploration purposes. The work was completed and Comstock was released from the NDEP order on June 25, 2011. Under Code of Federal Regulations, Title 33, Chapter II, Part 323, Section 323.4 – Discharges not requiring permits, a USACE permit was not needed to construct (nor remove) the temporary road crossing. Discussions with the USACE, however, continued regarding whether to permit or remove the clean fill materials. By letter dated February 10, 2012 Comstock outlined the path forward for assessment and removal of the clean fill materials. Comstock is conducting on-going exploration activities on the east side of Highway 342 and will continue to cross the Gold Canyon Creek; however, the fill associated with the temporary access road crossing will be removed as it is not required. This Work Plan discusses the results of the characterization and the plan for removal of the clean fill materials.

2. SCOPE OF SERVICES

The environmental assessment activities discussed herein were conducted in accordance with the "*Sampling and Analysis Plan, Comstock Mining Inc., Soils Assessment, Areas Affected by the Carson River Mercury Site, (January 25, 2012)"* as approved by the Nevada Division of Environmental Protection (NDEP) and Addendum #5, also approved by the NDEP. The scope of our activities included:

- Collecting 15 soil samples, including five 5-point composite samples; and nine discrete soil samples from nine soil borings;
- Implementation of the Site approved Health and Safety Plan for all sampling activities;
- Obtaining Global Positioning System (GPS) coordinates for each soil sampling location;
- Photographing all soil sample locations;
- Submitting soil samples to an NDEP-approved laboratory under approved sample handling protocols;
- Analytical testing of collected soil samples for lead (Pb), mercury (Hg) and arsenic (As);
- Conducting data review and data validation of all analytical results;
- Disposing of investigation derived wastes (IDW); and,
- Preparation of this Work Plan.

3. BACKGROUND

Mining in the Carson River drainage basin commenced in 1850 when placer gold deposits were discovered near Dayton at the mouth of Gold Canyon. Throughout the 1850s, mining consisted of working placer deposits for gold in Gold Canyon and Sixmile Canyon. These placer deposits ultimately led to the discovery of the underground ore deposits known as the Comstock Lode.

The initial ore discovered was extremely rich in gold and silver. Gold was more abundant in Gold Canyon while silver was more abundant in Sixmile Canyon (NDEP, 2011). Early mining methods concentrated on exposing as much of the lode as possible in wide trenches. Throughout 1859, ore was shipped to San Francisco for processing. After local ore processing began in 1860, most major mines operated their own mills, but there were also a large number of private mills. Initial ore processing techniques were slow and inefficient and a fair amount of trial and error experimentation led to the development of an effective ore-processing technique known as the Washoe pan process. Refinements were aimed primarily at increasing the speed of gold and silver recovery, increasing the percentage of gold and silver recovered and decreasing the amount of gold and silver discarded in tailings piles. The general milling process employed before 1900 involved pulverizing ore with stamp mills, creating a slurry, and then directing the slurry across a copper plate coated with mercury. The precious metals would adhere to the mercury on the copper plate in an amalgamation of recoverable metals. The millwrights would scrape the mercury amalgam from the copper plates and recover the precious metals through use of a smelting furnace. The majority of the mercury was recovered and reused in the process, however, some mercury was consumed in the process because of inefficiencies and losses in the amalgamation process, as well as in the smelting and retort process. After 1906, cyanide leaching and flotation processes replaced amalgamation and mercury use was generally discontinued.

Gold and silver production from the Comstock Lode increased slowly during the early years and 1863 was the first year of large production. Throughout the remainder of the 1860s and most of the 1870s, production remained high as rich ore bodies continued to be discovered at progressively deeper depths. The bottom of the lode was abruptly reached in 1877 at a depth of about 1,650 feet, and 1878 was the first year of dramatically reduced production. Between 1877 and 1878, ore production dropped from 562,519 tons to 272,909 tons and the total value decreased from $36,301,536 to $19,661,394. In 1879, production and value dropped even further. In 1901, the first cyanide-leaching operation began in Sixmile Canyon. Cyanide leaching was capable of recovering more gold and silver from lower- grade material than was possible by amalgamation methods and during the early 1900s mining operations consisted of mining lower-grade material and reworking former ore dumps and tailings piles. Between approximately 1920 and 1950, large tonnages of low-grade ores were mined (NDEP, 2011).

3.1 Sampling Area Description

The portions of the Gold Canyon Creek Area applicable to this Work Plan are shown on Figure 2. This area includes several features as identified in the NDEP-approved SAP. Soil sampling activities within this area specifically targeted the following:

1. Suspected historic workings, including the Globe & Lindsay and Lindsays Mill Sites.
2. Areas which may have been affected by fluvial redistribution of contaminants of concern (COCs) (mercury, lead, and arsenic). As an initial step, at least the first quarter acre down-gradient of known source areas were sampled.

3.2 Previous Investigations/Regulatory Involvement

In the 1970's the United States Geological Survey (USGS) discovered high mercury levels in water samples in the Carson River. Subsequently, the United States Environmental Protection Agency (USEPA) designated the CRMS and placed it on the National Priority List (NPL) regulated under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The USEPA divided the CRMS into two Operable Units (OU's): OU1 consists of the mill sites and those areas where tailings have contaminated surface soil (generally the source areas), and OU2 is the Carson River itself, including sediments and biota (generally the depositional/ecological areas). USEPA designated NDEP as the CRMS lead agency to manage OU1 of the CRMS and NDEP delegated this responsibility to the BCA. Areas likely to have the highest levels of COCs include former mill sites and associated drainage pathways down-gradient of mill sites as well as within the Carson River system itself.

3.3 Geological Information

The geology of the Site has been mapped as Quaternary Young Alluvium with Tertiary intrusions consisting of Alta Formation, Biotite Horneblende Andesite Dikes, Santiago Canyon Tuff, and Davidson Diorite (Hudson, 2009). The Young Alluvium is described as poorly sorted Holocene deposits of boulder to silt-sized material deposited on alluvial fans and as channel deposits. The Alta Formation, Biotite Horneblende Andesite Dikes, and Davidson Diorite are described as magmatic suites consisting of horneblende andesite dikes and intrusions. Lastly, the Santiago Canyon Tuff is described as Miocene-Oligocene tuff and sediment consisting of light gray to pinkish gray, moderately to strongly welded, rhyolitic tuff and can be as much as 120 m thick (Hudson, 2009). Additional details regarding the Site geology are discussed in detail in the SRK geochemical evaluation contained in Appendix A (SRK, 2012).

Based on State of Nevada Division of Water Resources well log data for the vicinity of the Site, groundwater is estimated to be between 12 and 100 feet below ground surface (bgs).

3.4 Environmental and/or Human Impact

Historic mining activities in the Comstock region used elemental mercury to amalgamate gold and silver. It has been estimated that 7,500 tons (15,000,000 pounds) of elemental mercury was lost in the process of obtaining gold and silver. Additionally, lead and arsenic were concentrated and discharged during the ore extraction and processing. These compounds (mercury, lead and arsenic) migrated into soils via fluvial pathways and hence into the Carson River system along a 75-mile stretch of the Carson River from New Empire, just east of Carson City, to its termination points at Carson Lake, Stillwater Wildlife Refuge and the Carson Sink. Episodic flooding and fluvial deposition have produced areas with high COC levels which represent "hot spots" within a wider area of possible contamination.

During site investigation activities, USEPA was not able to collect enough data to define a precise site boundary for the CRMS. NDEP and USEPA have instead developed a preliminary method of bounding the Site. As a preliminary method of bounding the Site, NDEP identified potential risk area boundaries, meaning the largest areas within the general CRMS site description where there is a potential that historic mill sites or tailings might be present and where soil might contain mercury in concentrations above 80 mg/kg. Conversely, USEPA and NDEP have excluded from the CRMS upland areas and areas away from historic mill sites. NDEP developed

a CRMS potential risk area boundary map ("NDEP Risk Area Map") that was first made available to the public on the NDEP website on April 27, 2011.

4. PROJECT DATA QUALITY OBJECTIVES

Project DQOs are addressed in the NDEP-approved SAP and as such are not repeated herein.

4.1 Data Quality Indicators (DQIs)

Data quality indicators (precision, accuracy, representativeness, completeness, comparability and sensitivity (i.e., PARCCS parameters) refer to quality control criteria established for various aspects of data gathering, sampling, and/or analyses. DQIs are discussed in detail in the NDEP-approved SAP and that discussion is not repeated herein.

4.2 Data Review and Validation

Data review and validation was completed per the NDEP-approved SAP. Detailed data validation summary reports are provided as Appendix B to this Report. Due to the size of these reports they are only provided electronically. Data was minimally qualified and no data were found to be unusable.

In addition, MGA's QA officer supervised and performed data quality assessment tasks. MGA comprehensively evaluated and documented measurement data to monitor consistency with measurement quality objectives (MQOs), to quantitatively assess data quality, and to identify potential limitations to data use. MGA reviewed field and analytical laboratory data generated for this project, including the following:

- Chain of custody documentation;
- Laboratory batch QC frequency; and,
- Results of batch and field QC analyses.

These items were reviewed on a daily basis as samples were collected and delivered to the laboratory. In addition, MGA maintained continuous communication with Neptune and Company (Neptune) as 3rd party data validation was occurring and as the Site-wide database was being populated.

4.3 Data Management

Sampling was conducted in accordance with MGA's standard operating procedures (SOPs). A unique identification number was assigned to each sample. The number is an alphanumeric sequence that serves as an acronym to identify the sample. The following format was used for the sample designation:

<u>Soil Samples</u>**:**

Sample ID: COM001-SS-01-1.0

COM001 - MGA Project Number

SS-01 – Soil Sample Number (i.e., #1)

1.0 – Depth of Soil Sample (feet below ground surface)

Field logs were maintained throughout the project. Soil samples were preserved or cooled as required for each laboratory analysis. Samples were delivered or shipped to the laboratory under approved chain-of-custody protocol.

4.4 Assessment Oversight

Any modifications to the sampling plan were documented in the field logs as "deviations from the sampling plan." Numerous minor modifications to proposed sampling locations were completed to allow for logistical and safety constraints in the field. The sampling locations, as presented on Figure 2, represent the as-sampled locations. No notable deviations were noted.

5. SAMPLING RATIONALE

The sampling rationale was discussed in detail in the NDEP-approved SAP and is summarized below. The portion of the Gold Canyon Creek Area applicable to this Work Plan included 5-point composite samples and discrete samples. The specific locations of each of the points of the composite were laid out in the field based upon field conditions. For example, if visual evidence of tailings or historic disturbance was noted within the area of a five-point composite, such as a historic mill site, the sampling points of the composite were biased towards areas of visual evidence. Every point of the 5-point composite was located with mapping-grade equipment and this information was used in the development of the attached figures. The density and location of samples within this area was based upon the purported locations of historic mill sites and through discussions with NDEP.

5.1 Soil Sampling

The depth of soil sampling discussed in this Work Plan are the surface samples from 0-6" bgs. All soil samples were lab sieved to 250 microns (60 mesh). All samples were collected using hand tools, a powered auger or a direct push drill rig.

6. REQUEST FOR ANALYSIS

Laboratory analyses are discussed in Section 6.1 below.

6.1 Soil Samples

The soil samples were collected as described above and analyzed for the following (per the NDEP's LTSRP guidance):

- Mercury – USEPA Method 7471A or B sieved to 250 microns (60 mesh)
- Arsenic and Lead – USEPA Method 6010B or C, digestion 3050, sieved to 250 microns (60 mesh)

6.2 Analytical Laboratory

All analytical testing was conducted by Columbia Analytical Services (CAS). Analytical testing and sample handling was conducted in accordance with CAS's SOPs (as detailed in the NDEP-approved SAP).

7. FIELD METHODS AND PROCEDURES

Field methods and procedures were per the NDEP-approved SAP. No deviations were noted.

8. SAMPLE CONTAINERS, PRESERVATION AND STORAGE

Sample containers, preservation and storage were per the NDEP-approved SAP. No deviations were noted.

9. DISPOSAL OF RESIDUAL MATERIALS

Waste generated during this investigation includes decontamination fluids, used personal protective equipment (PPE) and disposable sampling equipment.

Decontamination fluids consisted of deionized or distilled water, residual contaminants, and water with non-phosphate detergent. The water and water with detergent were poured into drums. These fluids were subsequently placed into a Comstock-owned zero discharge pond for evaporation.

Waste soil was drummed and disposed of after analytical data were received from the laboratory. Drums were labeled as waste with "characterization pending" until the analytical data were received. While waiting for the analytical data, the drums were stored on-site in a secure location. Based upon the analytical data, the drums were disposed of at an appropriate regulated facility.

Disposable sampling equipment and used PPE were double bagged and disposed of in a municipal refuse dumpster.

10. SAMPLE DOCUMENTATION AND SHIPMENT

10.1 Field Notes

10.1.1 Field Logbooks

Field logs were completed describing all field activities, as discussed in the NDEP-approved SAP.

10.1.2 Photographs

Photographs were taken as discussed in the NDEP-approved SAP and are available upon request.

10.2 Labeling

All samples collected were labeled in a clear and precise manner for proper identification in the field and for tracking in the laboratory. The samples had pre-assigned, identifiable, and unique numbers as discussed above.

10.3 Sample Chain-of-Custody Forms and Custody Seals

All samples were delivered to the laboratory under chain-of-custody protocol. Laboratory supplied custody seals were used to seal the screw lid of each sample container.

10.4 Packaging and Shipment

Samples were placed in a sturdy cooler. Bubble wrap was placed in the bottom of the cooler. Sample containers were placed in containers provided by the laboratory. Ice was packed in zipper-locked, double plastic bags. Empty space in the cooler was filled with bubble wrap.

11. QUALITY CONTROL

11.1 Assessment of Field Variability (Field Duplicates or Co-located Samples)

Duplicate soil samples were collected for laboratory quality control purposes for each discrete area sampled or for one in every 20 samples. In addition, it is noted that the USEPA or NDEP may request to take splits or duplicate samples; however, no USEPA or NDEP split or duplicate samples were requested and none were collected in the Gold Canyon Creek Area.

11.2 Laboratory Quality Control Samples

Laboratory QC (e.g., matrix spike/matrix spike duplicate samples) samples were analyzed to monitor the precision and accuracy of its analytical procedures. These samples are discussed in detail in the data validation summary reports contained in Appendix B.

12. DATA EVALUATION

Only the 0-6" bgs data were evaluated in this Work Plan for locations that are adjacent to the limestone fill materials. The rationale for this is that the limestone fill materials and the geotextile were placed over native materials. When the limestone and geotextile are removed the workers may interact with surface soils. Hence the surface soils were evaluated for protectiveness of the workers and to determine if they are CRMS-impacted materials regulated by the NDEP.

12.1 Mercury

Mercury data is presented on Table 1 and on Figure 2. There were no exceedances of the NDEP's Residential Screening/Action Level. The range of concentrations is from 0.151 to 60.2 mg/Kg. The mean concentration is 8.28 mg/Kg. These data show that the mercury concentrations within the Gold Canyon Creek Area are below the NDEP's Residential Screening/Action Level of 80 mg/Kg.

NDEP derived site-specific background values and provided a range of 0 - 1.5 mg/Kg for mercury. There are a number of locations at the site which exceed 1.5 mg/Kg, however, all locations are below NDEP's Screening/Action Levels and/or site-specific background values as derived by the NDEP. These are all classified as Category 3 materials as defined in the NDEP's May 4, 2012 letter and hence are not regulated under CERCLA.

12.2 Lead

Lead data is presented on Table 1 and Figure 2. There were no exceedances of the NDEP's Residential Screening/Action Level. The range of concentrations is from 27.9 to 122 mg/Kg. The mean concentration is 53.44 mg/Kg. These data show that the lead concentrations within the Gold Canyon Creek Area are below the NDEP's Residential Screening/Action Level of 400 mg/Kg.

NDEP derived site-specific background values and provided a range of 0 - 63 mg/Kg for lead. There are three locations at the site which exceed 63 mg/Kg, however, all locations are below NDEP's Screening/Action Levels and/or site-specific background values as derived by the NDEP. These are all classified as Category 3 materials as defined in the NDEP's May 4, 2012 letter and hence are not regulated under CERCLA.

12.3 Arsenic

Arsenic data is presented on Table 1 and Figure 2. There were exceedances of NDEP's Residential Screening/Action Level of 32 mg/Kg. The range of concentrations is from 29.7 to 110 mg/Kg. The mean concentration is 54.92 mg/Kg.

NDEP derived site-specific background values and provided a range of 0 - 90 mg/Kg for arsenic in their May 4, 2012 letter to Comstock. There is one location at the site which exceeds 90 mg/Kg, however, this location meets NDEP's special criteria of being at or below the ceiling of 131 mg/Kg because lead and mercury are consistent with the NDEP-derived background values. This location is hence classified as Category 3 materials per the NDEP's May 4, 2012 comments and is not CERCLA regulated. All other locations are classified as NDEP material Categories 1-3 and are not CERCLA-regulated.

13. PROPOSED REMOVAL/MITIGATIVE MEASURES

The clean limestone fill materials will be removed in the area of the original high water mark (OHWM) through the use of an excavator and hand tools, as needed. The materials will be reused by Comstock on Site. The geotextile material will be removed by hand and disposed of at the Lockwood Landfill. As discussed in Comstock's February 10, 2012 letter to the USACE, the creek bottom will also be restored to its pre-clean fill placement elevation.

On March 27, 2012, NDEP issued Comstock a Temporary Working in Waterways Permit (TNEV2012394) for the removal of the temporary access road crossing for mining purposes. This permit will be adhered to by Comstock.

14. REFERENCES

Hudson, 2009. Hudson, Donald M., Stephen B. Castor, Larry J. Garside, and Christopher D. Henry, 2009. *Map 165 – Geologic Map of the Virginia City Quadrangle, Washoe, Storey, and Lyon Counties and Carson City, Nevada*. Nevada Bureau of Mines and Geology.

MGA, 2012. *Sampling and Analysis Plan, Comstock Mining Inc., Soils Assessment, Areas Affected by the Carson River Mercury Site, Gold Hill, NV*, January 25.

NDEP, 2011. *Draft Carson River Mercury Superfund Site Long-Term Sampling and Response Plan Risk Assessment and Soil Management.* November 10.

TABLE

Table 1 - Data Summary for Areas Adjacent Limestone Fill

Sample	Beginning Depth	Ending Depth	Result (mg/kg) Mercury	Result (mg/kg) Lead	Result (mg/kg) Arsenic	Material Category (per NDEP 5/4/12 letter)
COM001-SS-A5-01-0-6	0	6	1.98	38.4	45.4	3, due to mercury
COM001-SS-A5-02-0-6	0	6	17.3	101	44	3, due to mercury and lead
COM001-SS-A5-03-0-6	0	6	13.8	56.8	59.2	3, due to mercury
COM001-SS-A5-04-0-6	0	6	17.9	50.2	49.8	3, due to mercury
COM001-SS-A5-05-0-6	0	6	0.151	27.9	29.7	1
COM001-SS-A5-05-0-6"	0	6	2.04	49.7	70.1	3, due to mercury
COM001-SS-A5-06-0-6"	0	6	2.4	42.9	110	3, due to arsenic
COM001-SS-A5-07-0-6"	0	6	3.77	44.2	63.5	3, due to mercury
COM001-SS-A5-08-0-6"	0	6	2.58	46.8	62.8	3, due to mercury
COM001-SS-A5-09-0-6"	0	6	1.57	32.1	62.2	3, due to mercury
COM001-SS-GL-01-0-6	0	6	1.51	41.1	43.5	3, due to mercury
COM001-SS-GL-02-0-6"	0	6	0.661	28.6	48.7	2
COM001-SS-GL-03-0-6	0	6	2.16	72.2	41.8	3, due to mercury and lead
COM001-SS-GL-04-0-6	0	6	60.2	122	40.1	3, due to mercury and lead
COM001-SS-GL-05-0-6	0	6	2.83	49.2	55.3	3, due to mercury
COM001-SS-GLR-01-0-6"	0	6	1.65	51.9	52.6	3, due to mercury
		Minimum =	0.151	27.9	29.7	
		Maximum =	60.2	122	110	
		Mean =	8.28	53.44	54.92	
		Standard Deviation =	14.56	24.64	17.52	

Notes:

1. NDEP Screening/Action Levels

Arsenic - 32 mg/Kg

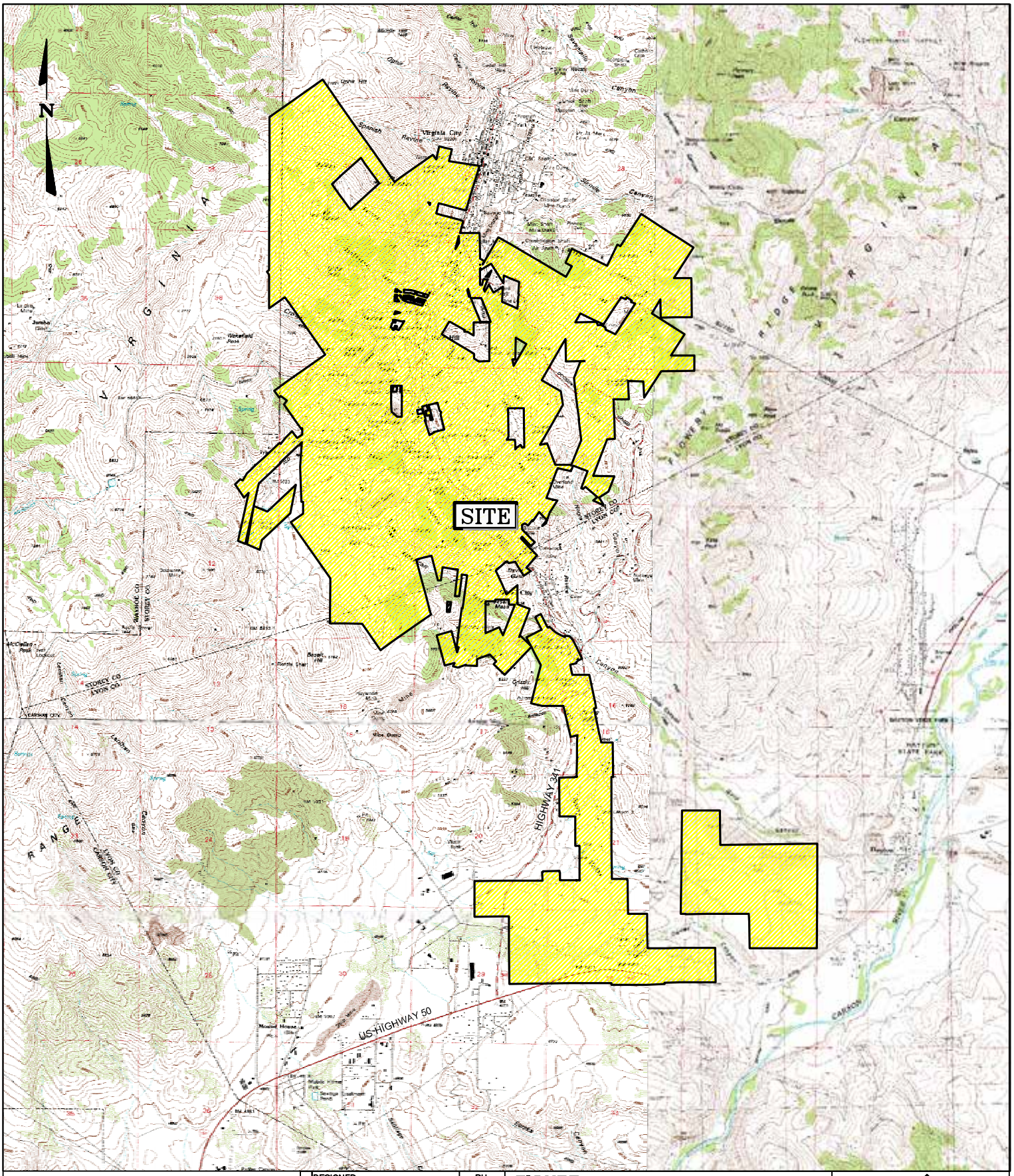
Lead - 400 mg/Kg

Mercury - 80 mg/Kg

2. Shading indicates a data point greater than NDEP Screening/Action Level

3. Per NDEP's 5/4/12 Letter categories 1-3 are not CERCLA-regulated materials.

FIGURES



REFERENCE		
DESIGNED		BH
DRAWN		TAD
CHECKED		
APPROVED		

REVISIONS No.	DESCRIPTION	BY	DATE
A			

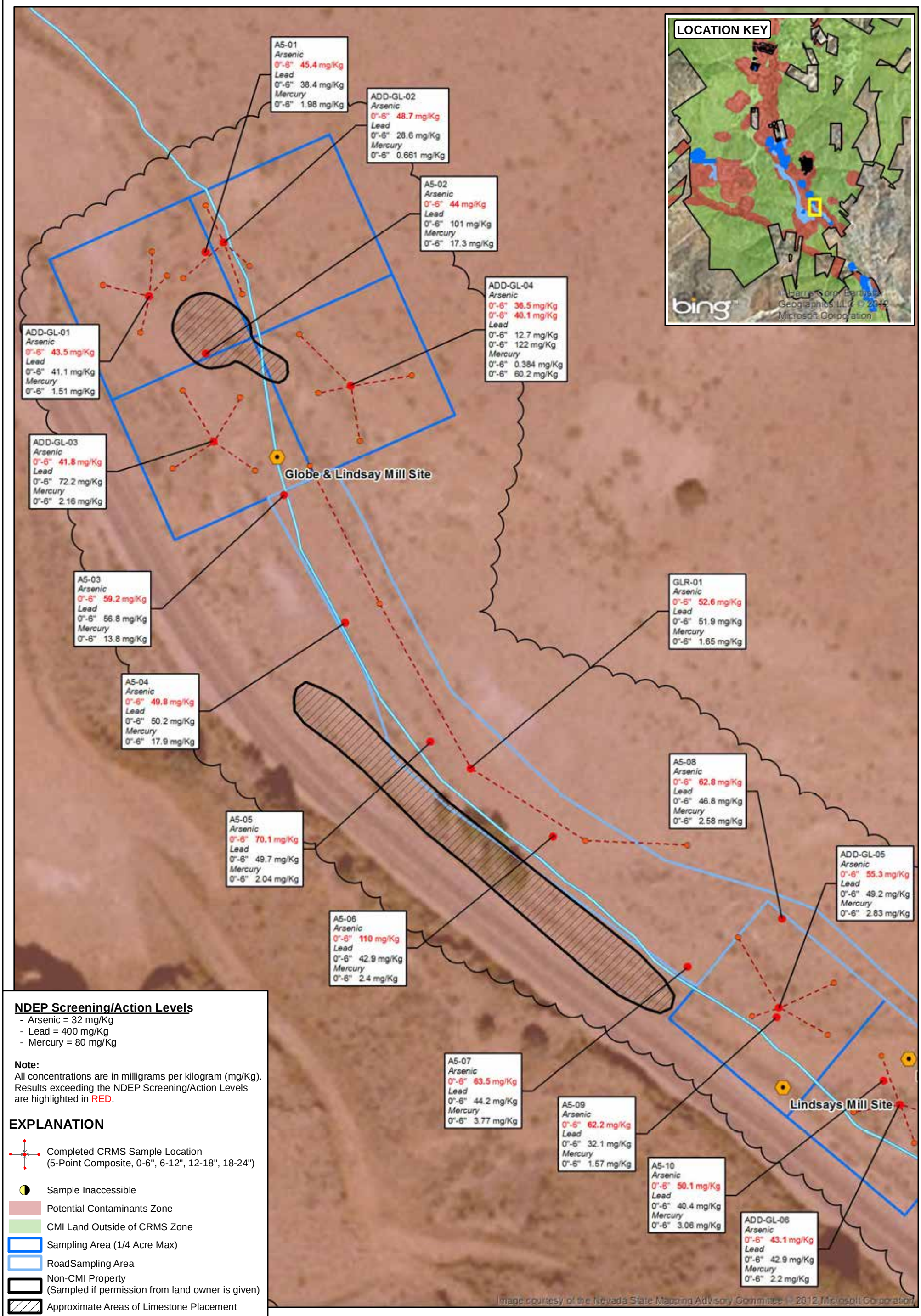
FIGURE 1

PROJECT LOCATION MAP
-SHOWING-
COMSTOCK MINE LAND HOLDINGS
STOREY AND LYON COUNTIES, NEVADA

McGinley & Associates

SCALE: AS SHOWN	REVISION
JOB NO. COM-001	A

Z:\Projects\Drafting\COM-001\COM-001-01.dwg 01/06/12 11:01 TAD



NDEP Screening/Action Levels

- Arsenic = 32 mg/Kg
- Lead = 400 mg/Kg
- Mercury = 80 mg/Kg

Note:
All concentrations are in milligrams per kilogram (mg/Kg). Results exceeding the NDEP Screening/Action Levels are highlighted in RED.

EXPLANATION

- Completed CRMS Sample Location (5-Point Composite, 0-6", 6-12", 12-18", 18-24")
- Sample Inaccessible
- Potential Contaminants Zone
- CMI Land Outside of CRMS Zone
- Sampling Area (1/4 Acre Max)
- RoadSampling Area
- Non-CMI Property (Sampled if permission from land owner is given)
- Approximate Areas of Limestone Placement

N

Feet
0 60

COMSTOCK MINING INC
Revitalizing the Comstock

Comstock

DESIGN: -	DRAWN: MAW	REVIEWED: -	
SCALE: 1 inch = 60 feet		DATE: 6/1/2012	
FILE: Sampling_Results_Figures_20120518_VS.mxd			

DRAWING TITLE:

Gold Creek Canyon

Surface Soil Concentrations
Arsenic, Lead, and Mercury

Comstock Mining, Inc.
CRMS Sample & Analysis Plan

ISSUED FOR: -

DRAWING NO. **Figure 2**

MGA JOB NO. **COM000.S001**

REVISION NO. **A**

PATH: D:\04_Projects\ComstockMining\MXD\Sampling_Results_Figures_20120518_VS.mxd