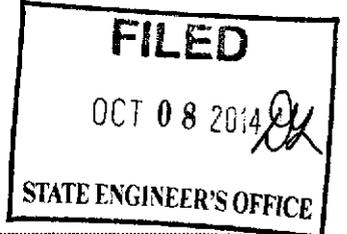


IN THE OFFICE OF THE STATE ENGINEER OF THE STATE OF NEVADA

IN THE MATTER OF APPLICATION NUMBER 84235
FILED BY WK Mining (USA) Ltd. of Elko, Nevada
ON August 13, 20 14



PROTEST



Comes now Nancy Boland, Esmeralda County

Printed or typed name of protestant

whose post office address is P.O. Box 145, Goldfield, Nevada 89013

Street No. or PO Box, City, State and ZIP Code

whose occupation is Chair of Board of Esmeralda County Commission

and protests the granting

of Application Number 84235, filed on August 13, 20 14

by WK Mining (USA) Ltd. of Elko, Nevada for the

waters of Alkali Springs Valley, Esmeralda, 142 situated in Esmeralda

an underground source or name of stream, lake, spring or other source

County, State of Nevada, for the following reasons and on the following grounds, to wit:

SEE ATTACHED EXHIBIT "A"

THEREFORE the Protestant requests that the application be DENIED

Denied, issued subject to prior rights, etc., as the case may be

and that an order be entered for such relief as the State Engineer deems just and proper.

Signed

Nancy Boland

Agent or protestant

NANCY BOLAND

Printed or typed name, if agent

Address

P.O. BOX 145

Street No. or PO Box

GOLDFIELD, NEVADA 89013

City, State and ZIP Code

775-485-3483

Phone Number

E-mail

STATE ENGINEER'S OFFICE

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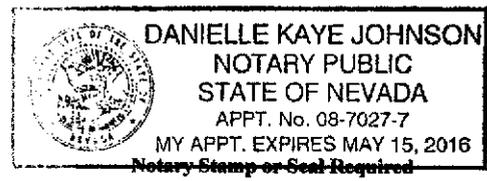
State of Nevada

County of ESMERALDA

Subscribed and sworn to before me on October 7, 14

by Nancy Boland

Danielle Kaye Johnson
Signature of Notary Public Required



+ \$30 FILING FEE MUST ACCOMPANY PROTEST. PROTEST MUST BE FILED IN DUPLICATE.
ALL COPIES MUST CONTAIN ORIGINAL SIGNATURE.

potential for detrimental long-term pumping effects to the down-gradient Klondike Wells, owned and operated by Esmeralda County, is of concern, both during the period of proposed pumping for mine water supply, and the post-pumping drawdown that will persist after cessation of mine pumping.

4. Pumping of the magnitude proposed under Application 84235 has never been accomplished in Alkali Spring Valley, and it is speculative as to whether it could be accomplished at the proposed point of diversion, without significant detrimental impacts including extreme levels of drawdown, induction of poor quality groundwater, and/or aquifer compaction and land surface subsidence due to large degrees of regional drawdown. These potentially detrimental effects would not only directly impact Esmeralda County's Klondike Wells, but could also detrimentally impact other county facilities and resources.
5. The place of use defined in Application 84235 incorporates portions of Hydrographic Basin 137A, Big Smoky Valley, to the north, and Hydrographic Basin 141, Ralston Valley, to the east, and is therefore subject to specific interbasin transfer statutes, including NRS 533.370 (3), and depending on magnitude of interbasin transfer, NRS 533.364. Under NRS 533.370, the applicant is required to provide sufficient information that the exportation of groundwater is justified, including specific considerations of the basin of origin. Application 84235 is incomplete in that no documentation has been provided to demonstrate that the proposed action is environmentally sound as it relates to the basin from which the water is exported, and that the application will not unduly limit the future growth and development in the basin from which the water is exported. Furthermore, a basin water resources management plan is required under the interbasin transfer statutes, and has not been completed and provided with the application.

Based on the foregoing, Application 84235 should be denied on the grounds there is no unappropriated water in the proposed source, it will adversely impact existing rights, and it is not in the public's interest.

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