

**From:** [Shane Owen](#)  
**To:** [zzMSHA-Standards - Comments to Fed Reg Group](#)  
**Subject:** RIN 1219-AB36 Request for Extension for Silica Rule Comment Period  
**Date:** Thursday, August 3, 2023 2:29:17 PM  
**Attachments:** [image002.png](#)  
[NGM Carlin Request for Extension.pdf](#)

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Please find the attached letter requesting an extension on the comment period for MSHA's proposed rule *Lowering Miner's Exposure: Respirable Crystalline Silica and Improving Respiratory Protection*.

Thank you,



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I am **RESPONSIBLE** to **STOP** unsafe work



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August 1, 2023

S. Aromie Noe, Director  
Office of Standards, Regulations, and Variances  
Mine Safety and Health Administration (MSHA)  
201 12th Street South  
Suite 4E401  
Arlington, Virginia 22202-5450

Re: RIN 1219-AB36, Docket Number: MSHA-2023-0001

Dear Director Noe:

Nevada Gold Mines LLC (NGM), Carlin respectfully requests a 120-day extension to the comment period provided in MSHA's proposed RIN 1219-AB36, *Lowering Miners' Exposure: Respirable Crystalline Silica and Improving Respiratory Protection*, as published in the Federal Register on July 13, 2023. MSHA has requested comments in 43 specific areas within a 45-day comment period. That timeframe is insufficient to provide thoughtful and meaningful comments on all 43 sections.

NGM Carlin is a joint venture between Barrick (61.5%) and Newmont (38.5%) that combined the Barrick Goldstrike and Newmont Carlin mines to create a tier 1 asset that employs over 3,500 people. The Carlin mine is comprised of five underground mines, several open pit mines, two roasting facilities, and one autoclave facility that in total employs 3,400 employees.

The proposed rule has extensive implications, and a thorough examination of its technical aspects, economic impact, and feasibility is essential for successful implementation. Extension of the comment period will allow all stakeholders, including industry representatives, trade associations, safety experts, and labor organizations, to conduct research, gather data, and engage in constructive dialogue. This additional time will also facilitate collaboration among the interested parties, promoting a more inclusive and transparent rulemaking process. It also allows sufficient time to address questions or concerns raised during the comment period.

The final rulemaking process will be greatly enhanced by providing sufficient time to review each of the 43 sections in a comprehensive and collaborative manner. NGM Carlin kindly requests that MSHA extend the comment period for 120 days and establish the comment deadline as December 26, 2023.

We appreciate your thoughtful consideration of these comments.

Sincerely,  
Nevada Gold Mines LLC

Gavin Ferguson, General Manager