

SEIS FAQs

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DONLIN
GOLD

Donlin Gold is committed to transparency, safety, and respectful engagement with communities in the Yukon-Kuskokwim region. This FAQ addresses questions about the updated modeling of a very unlikely dam breach scenario, in response to a recent decision by federal judge Sharon Gleason of the Alaska District.

Q: Why is the Army Corps of Engineers updating its tailings dam breach modeling?

A: The Final Environmental Impact Statement (FEIS) analysis evaluated the potential impacts of a hypothetical failure of the Tailings Storage Facility (TSF) Main Dam, considering a release equivalent to approximately 0.5% of the dam's total capacity. The Orutsararmiut Native Council (ONC) challenged this matter in the Alaska District Court, arguing that larger failures should also be evaluated. On September 30, 2024, Judge Sharon Gleason ruled against the US Army Corps of Engineers (USACE) and the Bureau of Land Management (BLM), stating that the EIS should have evaluated the effects of a larger tailings spill. In April 2025, the scope of the remand addressing this ruling was issued, requiring the USACE and BLM to supplement the FEIS with the evaluation of a hypothetical larger tailings spill. Donlin is not adjusting the tailings dam design, and the analysis does not re-open other parts of the EIS.

Q: What is a tailings dam and what would happen if it failed?

A: Tailings are a silt-like by-product of the mining operations that can contain naturally occurring metals and other byproducts from the millsite and plant site (where ore is crushed, grinded, and sent through a series of chemical processes to extract the gold). Tailings are controlled so they are not released to the environment. Instead, they are segregated and deposited in a tailings storage facility with a synthetic liner like those used in newly designed city landfills and sewage lagoons.

A tailings dam holds mining waste materials. In the event of a dam failure, some tailings may be released to the environment. As required by State permits, an Emergency Action Plan will be designed to determine the appropriate response to the extremely unlikely event of failure. Response measures would include ensuring the safety of mine employees and downstream residents; and stabilizing the TSF breach. Additional remedial measures may require an approved plan developed based on the details of the release.

(FEIS, Section 3.24.5.9.1)

Q: What is the purpose of the SEIS?

A: The purpose of the Supplemental Environmental Impact Statement (SEIS) is for the federal agencies to supplement their analysis of a portion of the FEIS by considering the potential effects of a theoretical larger tailings spill.

Q: Does this mean the risk of a dam failure/breach has increased?

A: No. The decision from Judge Gleason was that a particular technical requirement in NEPA and ANILCA was not met regarding analysis of a “reasonably foreseeable” size of tailing spill, and that the USACE and BLM must supplement the FEIS in order to meet that technical requirement.

Q: How likely is it that the tailings dam will fail?

A: No dam is completely risk-free, but modern tailings facilities in the U.S. are designed, independently reviewed, and monitored to make the likelihood of failure exceptionally low. The entire system—from engineering design to emergency planning—is built around preventing failure and protecting people and the environment. As part of the SEIS process, Donlin will expand and develop additional information on the tailings spills that have occurred worldwide and why these conditions will not exist at Donlin; we anticipate that USACE will use this information in its analysis.

Q: Have you studied the impact of potential seismic activity in the mine area?

A: Yes. Donlin Gold collaborates with the University of Alaska and operates a seismic station near the site. Donlin Gold has also completed a study of historic earthquakes on nearby faults, including the Nixon and Denali faults. This study was used to assess ground motion and has informed the design of the tailings dam to ensure it can withstand earthquakes. The study has been reviewed by the United States Geological Survey, and the results have been incorporated into the USGS seismic model to increase the understanding of earthquake activity in the region. The tailings dam is being designed to endure the maximum potential earthquake expected over a 10,000-year period.

Q: What safeguards are in place to ensure this incident/spill does not happen?

A: Donlin will employ numerous safeguards to ensure a catastrophic failure will not happen.

DESIGN - Downstream Method: Donlin’s “Downstream” dam design, where stability is entirely provided by sound competent rock built directly on bedrock, is the strongest design method for tailings dams and has not been the source of any significant failures at any mines around the world. Additionally, the dam’s footprint will be cleared of soil down to bedrock to prevent any inconsistencies in the dam’s foundational support. The downstream design ensures the dam does not rely on tailings for structural support. Each stage of the dam will be reviewed and approved by Alaska Dam Safety. This review includes a full review of the current dam stage’s design and performance.

MONITORING – Instrumentation and Inspections: Donlin will deploy extremely sensitive, high accuracy monitoring instrumentation within the dam to monitor for movement, settling, water levels, or other structural concerns that could compromise the dam’s structural integrity so those issues can be addressed. The instrument readings will be continuously read by the onsite process network with alarm levels set to alert the onsite engineering team of minor changes in the base readings. This allows the onsite engineering team to react to small changes before a larger issue develops. Additionally, Donlin personnel will carry out numerous routine inspections of the liner and dam (daily, weekly, monthly, and annual) to monitor for seeps or other corrective actions that must be addressed.

OVERSIGHT: Oversight is provided by the State of Alaska, Donlin Gold, The Kuskokwim Corporation, and Calista Corporation. In addition to continuous monitoring efforts by Donlin Gold that are shared with the State, the State of Alaska Office of Dam Safety will review and approve each lift design prior to construction to verify the construction method is designed and implemented with the best available technology and methods. TKC and Calista also maintain rights to access and conduct independent reviews of the dam’s safety at their discretion.

The permit to operate the tailings dam is issued for a three-year period. In the third year of the permit an independent engineering firm, approved by the Alaska Office of Dam Safety, will be contracted to conduct a “Periodic Safety Inspection.” During this inspection, all inspections that were conducted, and the operational performance of the dam is reviewed. This report is reviewed and approved by Alaska Dam Safety and a plan to address all findings of the PSI is required to be approved by Alaska Dam Safety prior to the reissuance of the permit to operate the dam.

Q: How is Donlin currently safeguarding fish habitat?

A: All wastewater discharged by the project will be treated to meet water quality standards that protect fish and human health. Donlin Gold will regularly monitor the discharge point to ensure safety and cleanliness, under the oversight of the Alaska Department of Environmental Conservation.

Donlin Gold will also monitor periphyton, macroinvertebrates, fish populations, water quality, sediment, and habitat conditions to maintain the health of Crooked Creek. The State of Alaska Department of Fish and Game will annually review monitoring results to confirm healthy fish populations, while Calista, TKC, and the Donlin Gold Subsistence Community Advisory Committee will also review these reports.

Q: How will you protect fish habitat in case of a breach?

A: Our first line of protection is designing and monitoring the facility, so a breach does not occur. In the unlikely event of failure, we will have emergency response and containment plans in place to limit downstream impacts, including protecting fish habitat, and we are committed to rapid cleanup and restoration if ever needed.

Q: How is Donlin Gold working with local communities?

A: Donlin Gold works with local communities through formal agreements with Calista and The Kuskokwim Corporation, regular community advisory committee meetings, local hiring and training programs, and support for village projects. Donlin Gold is engaging Tribal governments and community members through respectful dialogue on topics including tailings dam design and safety. We are committed to listening and responding to community questions, concerns and feedback, including as they relate to tailings management.

Q: What does the SEIS mean for the Project?

A: The requirement for a SEIS means there will be additional analysis, public input and review of additional tailings spill modeling. This adds time but also presents an opportunity to strengthen the analysis and continue to address community concerns.

Q: What happens next?

A: With the USACE starting a SEIS, the next steps are to review the technical data contained in the FEIS, gather public comments, determine the spill size to be modeled and to analyze the impacts of the hypothetical tailings release, and prepare both draft and final SEIS documents for review. The USACE will then decide on whether any changes to Donlin Gold's permit are appropriate. Meanwhile, we continue permitting for project dams and working on the bankable feasibility study ahead of a financial decision.

Q: Why isn't the entire FEIS being updated?

A: The Alaska District Court determined that only the effects of a larger tailings spill should be reevaluated through an updated SEIS process. The court ruled that the remainder of the challenges to the EIS lacked merit and that no additional work is needed in the other areas of the EIS. The USACE, in consultation with BLM, will determine the size of a tailings spill that must be analyzed in order to meet the requirements of NEPA and ANILCA.