



STATE OF  
COLORADO

Ebert - DNR, Jared <jared.ebert@state.co.us>

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## Comments NOI P-2007-069 Am01

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**Jennifer Thurston** <jennifer@informcolorado.org>

Thu, Oct 3, 2019 at 11:58 PM

To: Jared.Ebert@state.co.us

Howdy Jared,

I have attached some comments on the NOI amendment application for the Franklin and Freighter's Friend Shaft.

Please let me know if you need anything else.

Thanks,

Jennifer Thurston

Information Network for Responsible Mining

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**INFORM-Comments-Franklin-P2007069-Am01.pdf**

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# INFORM

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Oct. 3, 2019

Jared Ebert  
Environmental Protection Specialist  
Colorado Division of Reclamation, Mining & Safety  
1313 Sherman Street, Room 215  
Denver, Colorado 80203  
Via email to [Jared.Ebert@state.co.us](mailto:Jared.Ebert@state.co.us)

Re: Comments on Franklin & Freighter's Friend Shaft NOI P-2007-069 Amendment 01

Dear Mr. Ebert,

Thank you for the opportunity to comment on the amendment submitted for the Franklin & Freighter Shafts Notice of Intent, No. P-2007-069. The Information Network for Responsible Mining (INFORM) is a statewide citizens organization that addresses the impacts of hardrock mining across Colorado and whose members regularly use and enjoy the public lands in the vicinity of the Franklin Mine and the Idaho Springs area.

INFORM objects to the modification of the permit and believes that the prospector should be required to submit a complete mining application if operations at the mine are to continue into the future. It appears that the only modification proposed is an extension of the prospecting period for an unreasonably lengthy period of time, beginning in 2007 when the original Notice of Intent was submitted and now proposed to extend to the end of 2027.

According to Rule 5.1.2(e), the prospector is required to provide the anticipated date of completion of prospecting activities and also requires that prospecting activities be concluded within five years of the approval of the Notice of Intent; in this instance such activities should have concluded in 2013. By submitting a modification application to extend the prospecting project to a total of 20 years, the life of the operation appears randomly selected and too imprecise to conform to the intent of Rule 5.1.2. Twenty years to explore a mine is an unreasonably lengthy amount of time to continue the modest activities described, so modest in fact that the prospector asserts there is no surface disturbance or creation of waste at the site at all

and where the amount of material that is removed during exploration is only fleetingly described as “bulk sampling” in the permit file.

Rule 5.1.3 requires that reclamation of the prospecting site be completed within five years of ceasing prospecting activities. In this instance, that should have occurred by the end of 2018. Now is the time to require the prospector to submit an application to permit a Designated Mining Operation so that the site can be properly managed for the longterm with adequate environmental protection facilities in place.

The prospector should also be required to come up to date with the requirements of Rule 3.1.7(7) to provide an adequate groundwater monitoring plan and analysis for the prospecting area. The prospector should also be required to provide sufficient monitoring and water quality data to determine that the hydrological balance of the overall site is not being adversely affected by prospecting and mining operations.

Thank you again for considering these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Jennifer Thurston". The signature is fluid and cursive, with the first name "Jennifer" and last name "Thurston" clearly distinguishable.

Jennifer Thurston