



La Plata County
Colorado

Board of County Commissioners

Clyde Church, Chair • Gwen Lachelt, Vice Chair • Julie Westendorff, Commissioner

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Durango, CO 81301
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Notice of Intent for Proposed Mine Exploration Drilling in La Plata River Watershed

October 1, 2020

Colorado Department of Natural Resources
Division of Reclamation, Mining and Safety
Travis Marshall - Senior Environmental Protection Specialist
101 South 3rd, Suite 301
Grand Junction, CO 81501

RECEIVED

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**DIVISION OF RECLAMATION
MINING AND SAFETY**

Comments submitted via email (travis.marshall@state.co.us)

RE: Notice of Intent P-2020-011
La Plata Project, Gault Group, LLC. & Metallic Minerals US Inc.

Dear Mr. Marshall:

La Plata County appreciates the opportunity to provide a comment letter to the Colorado Department of Natural Resources Division of Reclamation, Mining and Safety in reference to the Gault Group LLC., and Metallic Minerals US Inc. **Notice of Intent P-2020-011**, La Plata Project. The site is located approximately 200 feet above, and 300 feet northwest of the headwaters of Bedrock Creek and sits just inside of La Plata County below Gibbs Peak.

Based on the information provided in the Notice of Intent (NOI), our understanding is that the operator plans to utilize fluid drilling procedures with a closed loop system to extract approximately 8,900 feet of core in search of copper, all within existing disturbance. The operator plans one vertical hole and three directional holes kicking off from the same surface location. The operator will reclaim each hole before advancing to the next. The final result will be a finished level consistent with existing grade.

As proposed, La Plata County has the following areas of concern that we believe require further analysis prior to the approval of the exploratory drilling.

Proposed Location Information

The location has been described as 9 miles northwest of Hesperus, Colorado within La Plata County and approximately 300 feet northwest of and 200 feet above the headwaters of Bedrock Creek. The latitude and longitude provided on the NOI identify a location within Montezuma County

approximately 1.3 miles north of the described location. This discrepancy in location must be addressed and clarified prior to approval of the proposed exploration.

37.407, -108.089 – correct location information

Surface Water and Groundwater Impacts

Surface water may not be present at the location but the location is in a sensitive area where any form of precipitation that falls on the location will run off into important and sensitive habitats and essential water resources for wildlife, agricultural practices and citizens of La Plata County. If there is any surface contamination during or following exploratory activities, it is likely these contaminants will migrate into surface waters and impact down gradient users and resources. It is essential to see a summary of the proposed best management practices and plans that the operator intends to utilize to protect against and prevent such occurrences. The La Plata River and its associated watershed are a primary resource for both citizens in La Plata County as well as residents downstream in New Mexico. A portion of the water resources associated with the La Plata River are subject to interstate compacts, including the La Plata River and Colorado River interstate compacts. Agricultural practices are at extreme risk from these potential impacts to water as they are heavily dependent on this resource to operate. Protections for these resources are imperative as part of planning and operations and must be assessed and implemented as part of the exploratory operations.

Groundwater is unlikely to be intercepted given the elevation and location of the proposed exploration, however, it is possible that the operator will encounter a perched aquifer or a restrictive layer supporting a large volume of groundwater. Zones where groundwater are intercepted may create a permeable zone or cause a new subsurface flow and groundwater resources may be impacted. Impacts to groundwater may not be anticipated, but they must be planned for in the event of contact. Impacts to groundwater as part of exploratory actions are unacceptable.

While it is understood that the geology in this area differs from others within La Plata County, acid mining drainage is a known concern within La Plata County and the surrounding counties. With this type of exploratory activity, toxic and/or heavy metals are anticipated and should be accounted for. It is recommended that a plan for managing drainage and migration of toxic metals and other contaminants be included prior to approval and execution of this exploratory activity. This plan should include management both during and after exploratory activities in order to protect the surrounding environment and down gradient users.

Impacts to La Plata County Citizens

Potential factors that may directly impact La Plata County citizens include increased traffic and noise in a remote area. An additional impact to be considered is the impact to recreation and the quality of the user experience in this area. Hunters, hikers and localized residents may experience impacts during drilling operations. It is understood that due to the topographical isolation of the drilling site these factors are likely to go unobserved, however, if there are observed noise and traffic impacts, an avenue to provide complaint or an incident report should be made available.

Additionally, La Plata County has concerns about the potential impacts of heavy equipment and increased traffic on county road surfaces as well as safety concerns with the increased and different traffic patterns and types. Changing patterns and use may result in both damages to the county roads and may create safety concerns for the citizens utilizing the general area. La Plata County would


recommend a road maintenance plan in the event that there are damages observed from these activities as well as a traffic control and safety plan.

Many residents within the La Plata Canyon area have raised concerns about the future impacts of the proposed activities. As this project continues to move forward La Plata County requests that a resource be made available, or if one already exists that it be shared as part of future outreach, to provide clarification, project tracking, and progress to the citizens who may be directly impacted by the future of these actions or citizens who have an invested interest in the project.

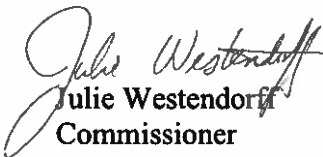
It is recognized that the Gault Group and Metallic Minerals US have diligently worked with the Colorado Department of Natural Resources – Division of Reclamation, Mining and Safety to prepare a NOI that identifies the proposed activity as well as areas of concern and protection that may be observed as or identified as impacts. La Plata County appreciates the work that has been put into this proposal thus far, but requests the above issues be rectified or provided prior to the approval and execution of any further exploratory activities.

Sincerely,

LA PLATA COUNTY
BOARD OF COUNTY COMMISSIONERS


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Chair


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Commissioner