

INFORM • San Juan Citizens Alliance • Sheep Mountain Alliance

June 15, 2021

Lucas West
Environmental Protection Specialist
Division of Reclamation, Mining and Safety
101 South 3rd, Suite 301
Grand Junction, CO 81501
Via email to lucas.west@state.co.us

RECEIVED

JUN 15 2021

**DIVISION OF RECLAMATION
MINING AND SAFETY**

Re: Comments on Notice of Intent P-2021-008, Wedding Bell Project (Groundhog Area)

Dear Mr. West,

Thank you for the opportunity to comment on the Notice of Intent, P-2021-008, for the Wedding Bell Project in San Miguel County, submitted by Standard Metals. These comments are submitted on behalf of Information Network for Responsible Mining (INFORM), San Juan Citizens Alliance and Sheep Mountain Alliance.

Rule 5.1.2(d)(v)(A) and (B) requires that adequate maps with sufficient details be submitted in order to identify the proposed prospecting sites, including all surface areas that will be disturbed, such as drill holes, mud pits, excavations, trenches, adits, shafts, tunnels, rock dumps and prospecting roads. The public form for NOI P-2021-008 does not provide sufficient detail to determine how the surface will be impacted by the proposed activities, specifically, the exact locations of access routes and new road to be constructed in order to access the drill hole locations. Without this exact location information, it is not possible to determine the exact impacts that the proposed exploration activities will create.

Although Rule 1.3(4)(b) allows a prospector to designate as confidential the location, size or nature of the mineral deposit, the precise location of all surface impacts may not be withheld. Pursuant to Rule 1.3(4)(f), we request that all information provided by the prospector that indicates the location and extent of surface disturbance be disclosed, including maps, diagrams and supporting documents that identify the specific areas of access roads, proposed roads, drill pad locations, mud pits, stock piles, berms, culverts, equipment storage and all other impacted surface features. Should the prospector continue to withhold this information as confidential, we request that a hearing be held before the Mined Land Reclamation Board to determine whether the information should be released publicly.

The drill sites are located in an area of public lands that experiences high recreation use, including climbing, mountain biking, jeeping and motorized travel. A San Juan Hut System mountain bike hut is located in the area adjacent to the project and

visitors will likely experience impacts from the drilling activities, causing conflict. The Wedding Bell area is already significantly degraded due to the high number of historic, unreclaimed drill roads from previous mining operations, so the proposed activities will increase the cumulative impacts the area is already experiencing. The project area provides important habitat to wildlife species of interest, including mountain lion, bighorn, black bear, mule deer and elk, as well as nongame species and mature piñon juniper ecosystem. The surrounding areas at Wedding Bell and Radium Mountain also contain abundant historic features from Native American cultures as well as 19th and 20th century mining and pioneering historic periods, and conditions should be applied to any activities that historic sites and artifacts be preserved and protected if encountered during operations.

New road construction should be prohibited, and the prospector should be required to take all extra precautions not to disturb any more surface areas than absolutely necessary and select drilling sites accessible from pre-existing roads. The ecosystem is fragile and reclamation is difficult to achieve, especially in extended drought conditions, and the importance of protecting the area overall rather than degrading it further should be the overriding factor in authorizing exploration activities. The economic value of these public lands is based on recreation and tourism and not mining, and prevention of new impacts is important in maintaining that value.

Thank you in advance for your consideration.

Respectfully submitted,

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