

INFORM • San Juan Citizens Alliance • Sheep Mountain Alliance

June 24, 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 24 2021
DIVISION OF RECLAMATION
MINING AND SAFETY

Re: Comments on Notice of Intent P-2021-009, Wedding Bell Project (Section 23 Area)

Dear Mr. West,

Thank you for the opportunity to comment on the Notice of Intent, P-2021-009, for the Wedding Bell Project in San Miguel County, submitted by Standard Minerals. 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 detail 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 available for P-2021-009 does not include maps, but describes activity that will entail 11 separate drilling sites, 50x50-foot pads, and two new roads totaling 1,050 feet in length. In order to determine the impacts to surface area, a map must be supplied that details which surface features will be disturbed and where the roads will actually be located. This information is especially critical to understand because the Notice says that County Road 14Y will be used to access the project (in addition to the new roads) and it is likely to create conflict with recreationists as CR 14Y is a popular route for vehicles and provides access to camping, climbing, biking, and hunting areas in the Wedding Bell area.

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, and maps may not be withheld. Pursuant to Rule 1.3(4)(f), we

request that all information provided by the prospector (other than Form 1) be disclosed, including all maps, diagrams and supporting documents, including those that identify the specific areas of access roads, proposed roads, drill pad locations, mud pits, stockpiles, berms, culverts, equipment storage and laydown areas, and all other impacted areas. 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.

Rule 5.1.2(d)(vi) requires that the prospector provide proof of access to the public lands where exploratory activities will occur, and this information is also missing from the public file. The prospector should be required to submit this information and it should be available for public review. Additionally, it is unclear whether there is a connection between Standard Minerals Inc. – listed as the prospector – and Thor Mining LLC, a corporation that has been publicly promoting its future development of this area for mining. The relationship between these companies should be clarified for public benefit.

The general location of the proposed exploration activities in Section 23 is of great concern to our organizations, as they will likely experience negative impacts from mining activities and the area is of high value for public recreation. The Wedding Bell and Radium Mountain area is cherished for its natural scenic values, its proximity to the Dolores River, the superb opportunities it provides for biking, climbing, hiking, wildlife viewing, camping, jeeping, as well as the presence of paleontological resources and abundant historic artifacts from 19th and 20th century mining and pioneering historic periods and Native American settlements. Any drilling activities approved in the area should also require consultation with the Colorado State Historic Preservation Office and should be subject to federal review under the National Historic Preservation Act. Additional mitigations should be required to address the preservation and protection of any artifacts or historic features encountered during operations.

We oppose the approval of any exploration or mining areas in this area and believe that those activities will only cause negative impacts and conflicts with other public uses that have greater value to the regional economy. Therefore, we request that you deny approval of P-2021-009. We especially object to the development of any new roads – temporary or permanent – that are proposed for access, and should the Notice of Intent be approved, we request that no new road construction occur and restrictions be placed on any approvals requiring that the drill hole sites be relocated or accessed without overland vehicles. The prospector should be required to take all extra precautions not to disturb any more surface areas than absolutely necessary and should be encouraged to shrink the proposed size of drill pads and surface impacts. The ecosystem is fragile and reclamation is difficult to achieve, especially in extended drought conditions. 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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