

DRMS Comment Objection Intake Tool



COLORADO
Division of Reclamation,
Mining and Safety
Department of Natural Resources

By submitting this form, you are providing a comment or objection to the public record of a permitting action currently under review by the Division of Reclamation, Mining and Safety.

CONTACT INFORMATION

Date of Comment of Objection

08/03/2021

***** *Indicates a Required Field*

Contact Type *

- ☒ Individual
☐ Group
☐ Agency
☐ Attorney

Please select the appropriate option above to identify who you represent.

Your First Name *

Kathy

Your Last Name *

Shauvin

Your Address *

1012 Greenwood Avenue

Your Address 2

Your City *

Canon city

Your State

CO

Your Zip Code *

Maximum of 10 digits. (Example) 80202

81212

Email Address *

Enter a valid email address in this field to receive a confirmation e-mail.

shauvin.kts@gmail.com

Your Phone Number *

Used only to follow up.

303-929-55

Extension

Alternate Phone Number

Used only to follow up.

Alternate Phone Extension

Connection to Operation *

Select all that apply

- | | |
|--|---|
| <input type="checkbox"/> Land Owner of affected land | <input type="checkbox"/> Structure Owner within 200' of affected land |
| <input type="checkbox"/> Mineral Owner | <input checked="" type="checkbox"/> Nearby Resident |
| <input type="checkbox"/> Adjacent Land Owner | <input checked="" type="checkbox"/> Concerned Citizen |
| <input type="checkbox"/> Government Agency | <input type="checkbox"/> Other <input type="text"/> |

DESCRIPTION OF COMMENT OR OBJECTION

(Please be as specific as possible)

Comment/Objection Narrative *

Background:

The organization submitting the mining permit application is Zephyr Minerals. Zephyr is a Canadian public company based in Nova Scotia. While they do rent some space in Canon City, they have no roots or facilities in Colorado or anywhere in the USA. Any money they might ultimately make will be returned to Canada. They were formed in 2012 for the sole purpose of exploring minerals in our area (so most of the homes in the area were built before Zephyr Minerals even existed). The two Zephyr principals have had an interest in claims in the area dating back to the 1980's.

Zephyr started their community involvement early after forming, a good thing. They held several public meetings to discuss their intent and approach. Then on September 25, 2018 Zephyr sent the following message: "We are advised by Counsel that given the threat of pending legal action against Zephyr Minerals Ltd. ("Zephyr" or the "Company"), that the Company will not be hosting any further information sessions other than those specific to the requirements of any permit applications". Apparently they decided it is best to work through formal channels and not the public. One can only speculate as to their rationale. It is true that a suit was being considered. Why would Zephyr not want to share information as a good neighbor?

Zephyr's worked hard to avoid any environmental impact assessments, and done exploration in the Grape Creek area which is "two protective federal designations, the Grape Creek Area of Critical Environmental Concern (ACEC), identified in the BLM's 1996 Royal Gorge Field Office Resource Management Plan (RMP), and the Lower Grape Creek Wilderness Study Area (WSA)." Clearly they are avoiding thorough evaluation of their operations.

The location of the proposed mine is approximately:

- 4 miles southwest of downtown Cañon City
- 1.5 miles from Cañon City Limits
- 1.3 miles from Grape Creek

Growth:

Zephyr has expanded their holdings, changed the minerals being investigated, and changed their proposed mining techniques since being formed. While change is typical, no one knows what the next revision will be. And no one local is being involved or educated. Change just happens regardless of the community. For example, on February 21, 2020 Zephyr announced: "Zephyr Minerals Ltd. continues to advance its 100% owned high grade Dawson-Green Mountain Project in Colorado, USA. After expanding its land package to 1,385 hectares (3,430 acres) the Company plans to explore the entire 12.2 km (7.5 mi) mineralized trend using the Broken Hill Type deposit as an exploration model." Change is likely to occur again. Will it be in favor of Zephyr or will the community and area be a primary concern?

Water risks:

The mine site at 6,500 feet elevation is 1,000 feet higher elevation than Grape Creek and the Arkansas river. It is upstream from the water plant intake for Fremont County. Any discharge from mining operations will find its way to the aquifers underground and/or the water flows. The mining operation would use approximately 65,000,000 gallons of water per year and an unspecified amount of chemicals. With the site just 1,000 feet above the Grape Creek and Arkansas River area, this creates the potential for pollution of the water for present and future generations.

The demand on underground aquifers has been estimated in the permit as "insignificant" but there is no monitoring or measures to be sure that the demand is having an "insignificant" impact.

Zephyr claims: "Not a single forest fire in the USA has been traced back to or been attributed to a modern mining operation." and "The mine operation will manage process water and storm water. The mill process water will flow through a closed recycling system with very little discharge if any." How many unexpected disasters have resulted from mining? It is certainly possible that the proposed Dawson Gold Mine could be yet another disaster in the making.

Fire risks:

The permit is non-specific in the amount of water reserved for fire mitigation. It states "sufficient." There is no Fire Protection plan associated with the current application. How could government entities approve the permit without an assurance of being able to mitigate a fire before it becomes a wild fire? The mine location is in a juniper forest, semi-arid climate which is essentially a tinder box.

There would be "approximately 13,000 pounds of explosives onsite for up to a week of blasting activity ... replenished weekly". Adding explosives to an area already a tinder box for a wild fire could create a wild fire that wipes out the entire region particularly without an established fire protection plan. Why incur this risk?

Chemical risks:

Chemicals that will be used in specified processing include:

- Potassium Amyl Xanthate - 2,250 lbs onsite
- Methyl IsoButyl Carbinol - 900 lbs
- Generic anionic emulsion flocculent - 450 lbs

That's 3,600 pounds of chemicals to be stored onsite and refreshed as needed. No one knows how these chemicals will interact with the ore taken from the mine and whether they will become toxic or not. Mix chemicals and ore of unknown reaction with 65,000,000 gallons of water annually and a potential disaster could occur.

Reclamation:

Only \$261,813 has been reserved for reclamation of the "affected area" when the mine shuts down. For 82 acres? With no inflation factored into the figures? Even without structures, concrete pads, holding ponds, etc., 82 acres could not be professionally landscaped for \$261,813. The reclamation allocation is too small and is not adjusted for inflation.

Funds to solve problems:

There is no allocation funds to address an unexpected fire, explosion, pollution leakage, or power outage. Zephyr has to seek additional funding to operate a mine or sell off to a larger concern. Without a requirement for a "problem reserve", where would money come from to mitigate a significant problem?

The request:

PLEASE do not approve this mining permit application! The application does not have sufficient assurances that a long-term disaster will not happen or that short term significant problems can be resolved.

Permit Number *

Enter valid letter and then numbers, for example M122112211 or C123456789.

P2013002

Permitting Action Type

Permit Type

County *

Fremont

Site Name

Permittee/Operator Name

Comment or Objection *

- ☒ Objection
- ☐ Support
- ☐ General Comment
- ☐ Agency Comment

ADDITIONAL INFORMATION

Are there supporting photos, maps, or documents you wish to upload? *

- ☐ Yes
- ☒ No

By submitting this form electronically you agree to receive any/all follow up correspondence from the Division of Reclamation, Mining, and Safety at the email address you have provided.