

May 25, 2022

Lucas J. West
Environmental Protection Specialist
Colo Div. of Reclamation, Mining and Safety
Dept. of Natural Resources
1313 Sherman St. Room 215
Denver CO 80203

Re: Klondike Basin Exploratory Drilling Project File No. P=2022-055
Notice of Intent to Conduct Prospecting Operations

Dear Mr. West

I wanted to comment on this exploratory drilling proposal from Alianza on behalf of Tarsis Resources in the Klondike Basin region of San Miguel County.

I served as San Miguel County Commissioner for 20 years (1997-2017) and am well acquainted with the region and with the Dept. of Natural Resources. I currently live in Norwood and am retired. While I have a strong environmental bent and was a co-founder of the Sheep Mountain Alliance in Telluride 30 some years ago, I also have been supportive of extractive industries that are done carefully and wisely. In 2005 I received the Theos-Johnson Bridge Builder Award from Club 20 in Grand Junction and in 2006 the Energy Forum award from Encana Oil & Gas, Inc.

I got to listen to the Alianza proposal and testify in a hearing before the current Board of County Commissioners that I attended virtually. I thought Mr. Sweet of Big Rock Exploration did a pretty good job of explaining the mitigations they had planned for the drilling.

While I don't object to the exploratory operation as presented, I am concerned about the mitigations offered and want to be sure those mitigations will be enforced.

Mr. Sweet mentioned in the county hearing that peanut oil is sometimes used in the drilling machinery and, given the polluting nature of petroleum-based oils, I would like to suggest that machinery oils be limited to peanut-based products as often as possible on this project.

Having had several bad instances of bonding insufficient to reclaim damaged public lands in this county (such as the insufficient BLM bonding in the 1980s for the Specie Creek/San Miguel River abandoned mining operation), I share the concern of Commissioner Hilary Cooper that the bond for this operation be sufficient to clean up all drilling site and road improvements. Too often we've seen irresponsible companies sell off assets and the people get stuck with cleanup. It was interesting that in the Standard Materials public hearing presentation in the county following the Alianza public hearing that the Standard Materials spokesperson noted that it was company policy not to reclaim their bond until all entities involved had signed off on it. Is there a way to make San Miguel County approval required for any return of bond monies to the

company? Further, I would like to see bond monies held until full cleanup is done, not based on an arbitrary time limit for the bond to be held.

Given how hard it is to revegetate in this area in the midst of a record drought, I would like to see Alianza using a seed mixture that meets CPW's Mark Caddy's concern for bushes for deer browse as well as a revegetation mix specific for the soil types disturbed that meets County preferences, not just BLM's seed mix. Hopefully native plant seed will be the whole or at least the majority of the revegetation seeding program. And I further hope that revegetation will be monitored for three years following the drilling to be sure it is successful and watering procedures initiated if need be at that point until the revegetation succeeds.

My final comment is regarding several globally imperiled plants found in the region being considered for drilling: *Astragalus naturitensis* (Naturita milkvetch) G2G3¹ and *Oreocarya revealii* (Gypsum Valley cat-eye) G2¹ – both listed in the Colorado Rare Plant Guide². I myself have photographed the latter species in the general vicinity of the drilling operation. In addition, I have identified unusual varieties of lichen along the county road leading into the Klondike Basin near Highway 145 along with a lichenologist from the University of Utah a number of years ago. I would have preferred if Alianza had been required to have a botanist, preferably one associated the Colorado Natural Heritage Program, inspect all proposed drilling pad sites and associated roads before the permit was granted. However, if the project were to go forward, I would strongly insist that this work be done before any further disturbances in this area be allowed. I think it is time the U.S. follow the lead of Chile in requiring any development on public lands be investigated for globally imperiled flora, fauna and funga – the latter category now recognized as a critical part of any soil environment.

Thank you for this opportunity to comment. Please keep me in the loop on this project and any other reclamation or mining projects in San Miguel County.

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Footnotes:

#1/ Colorado Natural Heritage Program

<https://cnhp.colostate.edu/rareplants/definitions.asp>

GLOBAL RANK (G): based on range-wide status of a species

- G1 Critically imperiled globally because of extreme rarity (5 or fewer occurrences, or very few remaining individuals), or because of some factor of its biology making it especially vulnerable to extinction. (Critically endangered throughout its range).

- G2 Imperiled globally because of rarity (6 to 20 occurrences) or because of other factors demonstrably making it very vulnerable to extinction throughout its range. (Endangered throughout its range).
- G3 Vulnerable throughout its range or found locally in a restricted range (21 to 100 occurrences). (Threatened throughout its range).
- G4 Apparently secure globally, though it might be quite rare in parts of its range, especially at the periphery.
- G5 Demonstrably secure globally, though it may be quite rare in parts of its range, especially at the periphery.
- GX Presumed extinct
- GQ Indicates uncertainty about taxonomic status.
- GU Unable to assign rank due to lack of available information.
- G? Indicates uncertainty about an assigned global rank.
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- #2/ https://cnhp.colostate.edu/rareplants/list_location.aspx?GeoScaleID=3