

November 22, 2022

Lucas West
Colorado Division of Reclamation, Mining & Safety
1313 Sherman Street
Denver, Colorado 80211
Via email to lucas.west@state.co.us

Re: Stateline Exploratory Drilling Project, P-2022-018

Dear Mr. West,

Thank you for the opportunity to comment on the Notice of Intent, P-2022-018, submitted by Big Rock Exploration Inc., Tarsis Resources US Inc. and Alianza Minerals Ltd. These comments are submitted on behalf of the Information Network for Responsible Mining and Sheep Mountain Alliance. INFORM is a statewide nonprofit organization that addresses the impacts of hardrock mining in Colorado. Sheep Mountain Alliance is a citizen's conservation organization that works to protect the greater Telluride region of Southwestern Colorado.

Sheep Mountain Alliance and the Information Network for Responsible Mining are opposed to inappropriate mine development in the Dolores River basin when it creates conflicts with broader regional conservation goals. The general area between Three-Step Pass and the Dolores River, where copper exploration is proposed, is a valuable recreational area that attracts visitors and supports local economies. Our organizations strongly believe that the motorized and non-motorized recreation opportunities and the value of the important ecosystems in the permit area far outweigh the limited benefits of mining in this region.

The broader conservation value of the region is reflected in the introduction of legislation this year to create the proposed Dolores River National Conservation Area (NCA), the result of a decade of local and regional planning and stakeholder efforts to preserve the Dolores River corridor and the adjacent landscape. The Stateline Project is located 0.9 miles from the boundary of the proposed Dolores River NCA. The legislation introduced in Congress states in Section 101(b), "The purpose of the Conservation Area is to conserve, protect, and enhance the native fish, whitewater boating, recreational and scenic, cultural, archaeological, natural, geological, historical, ecological, watershed, wildlife, educational and scientific resources of the Conservation Area." The Dolores NCA boundary (see attached map, boundary is in green), reaches all the way up McIntyre Canyon up to San Miguel County Road 4R. The impacts of a potentially

fully operational mining project should be considered in context of these described benefits of the proposed conservation area.

The TAP 2 (Transportation and Access Plan Travel Area 2 Route Inventory, DOI-BLM-CO-S010-2022-0003) planning process is currently underway in the BLM Tres Rios Field Office (TRFO). The prospector proposes to access the site from the Utah side via BLM Road 359 (also inventoried in the TAP 2 process as 1452 in the TRFO). Coordination with the BLM TRFO should be undertaken to ensure the activities proposed are in line with the current inventory and analysis of travel routes in this field office.

The surrounding area is abundant with cultural, archeological and paleontological resources, although it is largely unsurveyed for those resources. A condition of approving the Notice of Intent should require the operator to halt drilling if cultural resources are encountered during activities until the appropriate agencies can assess them.

The location of the drilling sites is in winter concentration habitat for elk, mule deer and bighorn, and exploration activities should be prohibited during the winter months. The drilling sites are also located close to bighorn ewing areas in McIntyre Canyon, and ewing can extend as late as May. Black bear and mountain lion are also present, as well as other valued species such as the olive-sided flycatcher, sage sparrow, the tiger whiptail, Western rattlesnake, and Gunnison's prairie dog. The area is also mapped habitat for 15 species of bat, including the Townsend's big eared bat, a Colorado species of concern. In order to protect wildlife, drilling and reclamation activities should not be allowed between December and May 1. In order to protect habitat, the prospector should be required to re-seed according to the specifications required by San Miguel County rather than rely on seed mixes approved by BLM or Colorado Parks & Wildlife.

The prospector states that BLM authorization is pending. Legal documentation to enter BLM lands and conduct exploration drilling should be required before the Notice of Intent is approved, in accordance with Rule 5.1.2(d)(vi).

The Notice of Intent does not specify where water will be sourced, despite the fact that a large amount – up to 20,000 gallons per day – is indicated in the application. Tarsis must secure and identify a source of this water before any approvals are granted. The water must also be supplied from outside the project area, otherwise the impacts of any local withdrawals should be subject to agency review and public comment in order to disclose any potential negative impacts.

We encourage you to require the best management practices that are appropriate for the drill sites in order to minimize any impacts to the watershed and to

restore the area once exploration is completed. INFORM and Sheep Mountain Alliance appreciates your consideration of these comments.

Respectfully submitted,

Jennifer Thurston
Director
Information Network for Responsible Mining
2205 W. 136th Ave. Ste. 106-311
Broomfield, CO 80023
(303) 586-1437
jennifer@informcolorado.org

Mason Osgood
Executive Director
Sheep Mountain Alliance
P.O. Box 389
Telluride, CO 81435
(970) 728-3729
mason@sheepmountainalliance.org

