



August 31, 2023

Tim Brown  
Tallahassee LLC  
P.O. Box 776  
South Fork, CO 81154

**Re: Tallahassee Resources Exploration, Notice of Intent to Prospect ID No. P-2023-015;  
Notice of Deficiencies**

Dear Mr. Brown:

On August 3, 2023, the Division of Reclamation, Mining and (Division) received your responses to our July 10, 2023 Notice of Incomplete Application letter and determined the application to be complete for the purpose of filing. The Division has reviewed the NOI application for deficiencies. Please address the following items:

**Application:**

1. Item I.3, Company Name. The summary page for Tallahassee LLC from the Colorado Secretary of State submitted with the Application indicates the status is “Expired”. According to the Colorado Secretary of State website, the current status of Tallahassee LLC is “Reserved”. In order to proceed with the NOI approval process, the status will need to be in “Good Standing”.
2. Item I.5, Location Information. The Section box includes three sections: 21, 22 and 27. According to the provided map, all proposed boreholes fall in Sections 21 or 22; none in Section 27. Why is Section 27 included in the application form?
3. Item II, Maps & Drawings. The Parcel Ownership map submitted with the August 3<sup>rd</sup> responses shows several parcels for which access agreements were submitted but have no planned boreholes according to the revised “Location of drill pads, new trails and trails to be upgraded” map also included in the August 3<sup>rd</sup> response. The parcels the Division has identified with no proposed boreholes are: G, I, J, K, L and M. The Division also compared the ownership of parcels identified on the Parcel Ownership map with the Fremont County Assessor records and found one discrepancy with respect to Parcel G. The submitted map and surface access agreement identify the owner of Parcel G as Nicolle Meng, while the Fremont County Assessor records indicate the parcel is owned by Tiffany S. & Willy J. Sharp with a Sale Date of 4/23/2020. Please address the following:
  - a. Why are parcels and agreements included for which no boreholes are planned?
  - b. Verify the ownership of Parcel G.



4. Items III.5 and IV.4, Drill Cuttings and Borehole Abandonment. Item III.5 states that drill cuttings will be returned to the hole. Item IV.4 states that “Cement will be placed in the bottom 70% of each hole or to the top of the mineralized unit, whichever is greater thickness. Bentonite will be used above the cemented portion to fill the remaining depth.” Given the nature of the ore body being investigated and the required abandonment method stated in Item IV.4, please commit to not returning drill cuttings to the hole.
5. Item III.5, Wildlife Protection. Item III.5 states that “Sumps will be surrounded by a temporary fence which will keep animals out of the sumps before, during and after the drilling.” and that exploration will be on a 24-hour schedule. Please confirm the drill sites will be monitored to inspect the fence and possible presence of wildlife as long as fluid is present in the mud pit(s)/sump(s).
6. Item III.5, Groundwater Protection. The provided narrative states the mud pits will “allow for infiltration”. The Division is familiar with this area through over 20 years of permitted exploration activity and is aware of multiple water bearing zones in the Middle Tallahassee Creek area. Rule 3.1.6(5) requires drilling pits used during prospecting shall be constructed and operated to minimize impacts to public health, safety, welfare and the environment. Allowing drilling fluids to infiltrate risks the cross contamination of groundwater. Please address the following:
  - a. Provide a commitment to line the mud pits to prevent the infiltration of potentially impacted drilling fluids. Please indicate what materials will be used to line the mud pits and how the liner will be secured.
  - b. Explain how your drilling procedure will prevent potential cross contamination of groundwater during the drilling process.
7. Item III.6, Number of Sumps. The narrative states up to two sumps will be included at each drill pad in order to segregate water and cuttings from the uranium bearing zone and the non-uranium geologic layers. It would appear each drill pad would need a minimum of two sumps for the purpose of segregating fluid and cuttings and possibly a total of four sumps if as is common practice, separating cuttings and recirculating drill fluid. Please provide more detail on the process of segregating material and fluid from the uranium and non-uranium bearing zones and why only one sump might be sufficient.
8. Item III.6, Drill Pad Leveling. The narrative states “Drill pads will be leveled only when located on rough terrain”. The Division will assume regrading each drill pad is required for reclamation unless an estimate is provided for the number of drill pads planned for rough terrain.
9. Item III.7.B, Mud pit reclamation. Given the nature of the resource being investigated, the Division has required similar prospecting operations to ensure mud pits do not propose a potential long term impact to the environment. Please address the following:
  - a. Commit to sampling the contents and cover of the backfilled mud pits prior to backfilling to demonstrate the following limits will not exceeded:

- i. The concentration of radium 226 or radium 228 may not exceed the background level by more than 5 picocuries per gram (pCi/g).
  - ii. The concentration of natural uranium with no radioactive decay products present may not exceed the background level by more than 30 pCi/g.
  - iii. Background levels shall be determined by sampling each proposed mud pit location prior to any disturbance associated with the proposed drilling activity.
- b. Provide a timeline on sampling and providing results of the sampling in Comment 9.a. The Division will need a commitment to provide sampling results prior to backfilling the sumps.

10. Enclosed you will find a copy of a letter from Mr. Skip Blades. Please review and provide Tallahassee's position on each issue raised in the letter.

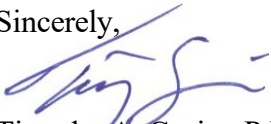
**Financial Warranty:**

Please note the Division will estimate a cost to reclaim the site based on the application and your response to the review issues above. Please be reminded that the proposed prospecting operations identified in the application may not commence until the deficiencies are addressed and the bond is submitted and approved by the Division.

Please provide a written response (which should clearly indicate the Prospect ID No. P-2023-015) to address the above deficiencies within 60 days of this notice (October 30, 2023) or the Division may deny the application.

If you have any questions, please contact me (303-328-5229).

Sincerely,



Timothy A. Cazier, P.E.  
Environmental Protection Specialist

Enclosure: Comment Letter from Skip Blades

ec: Michael, Cunningham, DRMS  
Hunter Ridley, DRMS  
DRMS file  
Jim Viellenave, Tallahassee LLC  
Angela Bellantoni, EAI

**Comment/Objection Narrative \***

July 18, 2023

Skip Blades  
548 Elk View Court  
Canon City, CO 81212

To: Colorado Division of Reclamation Mining and Safety,

I am commenting on permit P2023015 to encourage DRMS to reject the application. My wife and I are property owners in South T-Bar and are building our second home there. We decided on South T-Bar because of its sheer beauty, diverse wildlife, and quiet seclusion. The uranium drilling proposed in permit P2023015 clearly threatens all of that for the approximate 100 owners within South T-Bar. South T-Bar is a gated residential community with a single road entrance called South Tallahassee Trail that provides access to all properties. The proposed drilling is within 100 yards of South Tallahassee Trail in an open meadow where the drilling equipment and pads will be located. It will create a visual scar for the next 5 years, interfere with the resident elk herd and other animals that frequently visit the meadow to drink from the Middle Fork of the Tallahassee Creek, and create noise and light disturbance for "24 hours a day". All that alone should be enough for everyone to question..." Why would the State of CO approve permit P2023015?"

There is another permit P2021019 that was approved in 2021 in a lesser residential area. Okapi has an open request to reduce that permit from 60 to 40 holes. The 20 holes on the P2023015 are vastly different from those on P2021019 and should not be viewed as similar. P2023015 is in a higher residential area and next to the Middle Fork of Tallahassee Creek and Fear Creek.

The proposed drilling is within a few yards of the Middle Fork of Tallahassee Creek and Fear Creek. These tributaries converge into Tallahassee Creek that flows directly into the Arkansas River. There is a heightened level of risk for water contamination drilling so close to the water sources. The Arkansas River is a water source to downstream residences in Canon City, Pueblo, and the State of KS. I would think the State of Colorado should consider the risk to the Arkansas River Compact between Colorado and Kansas. There are significant financial penalties to the State of Colorado if we don't provide a certain level of quality water.

Uranium drilling has taken place previously in this area with clearly reported results. "Why does Okapi have to do it all over again?" Especially without providing the State of Colorado with a long-term plan that includes feasibility, method of extraction, storage, and transportation. I have heard experts say that the price of Uranium would need to increase to \$150 for it to be financially feasible to mine the Uranium in the area. Again, why do it Okapi? Method of extraction, storage, and transportation have a whole set of other questions and concerns that need to be understood. Okapi should be required to provide a long-term plan to the State prior to this permit approval.

The State of Colorado can't get caught up in the belief "it will never happen" because it has already happened. The Cotter Mill Superfund site in Fremont County is a multi-generational example of "it can happen". The State has the burden of taking that site over after the company walked away and the public is ultimately at risk for the costs.

This permit should be rejected by the State of Colorado because it is in a residential area, will disrupt the beauty of South T-Bar, impacts the wildlife, and risks the safety of our water.

Thank you for your consideration.  
Skip Blades

**Permit Number \***

Enter valid letter and then numbers, for example M1977999, M1999777UG or C1981201.

P2023015

**Permitting Action Type**

Select revision type or leave blank if comment pertains to a new permit application or NOI

**Permit Type**

Uranium Exploration Drilling