



August 30, 2023  
Reference Number P2023-012

Mr. Dustin Czapla  
Division of Reclamation, Mining and Safety  
1313 Sherman St., Rm. 215  
Denver, CO 80203

**Subject: Information Request for NOI P2023-012**

Dear Mr. Czapla:

Thank you for the opportunity to provide additional information for the Notice of Intent (NOI) submitted by Gault Group, LLC (GGL), on behalf of Metallic Minerals dated June 6, 2023. The following information addresses questions raised by your office in the letter dated August 8, 2023. Questions are included here in *italics*. GGL's responses are presented in standard font.

*1. Please provide latitude/longitude coordinates for each of the drill locations.*

CUH-01	-108.0738255	37.40099497
CUH-02	-108.0731264	37.3996757
CUH-03	-108.0747716	37.39955552

*2. Please provide the approximate direction that each of the boreholes will be drilled.*

	Azimuth	Dip
CUH-01a	345	-60
-01b	105	-60
-01c	225	-60
CUH-02a	345	-60
-02b	225	-60
-02c	105	-60
CUH-03a	345	-60

*3. Please see the attached letter of objection from Thomas Miller. Mr. Miller's well, DWR Permit #269788, is approximately located at 37.396970, -108.067714. Please inform the Division of protective measures to be taken by the Prospector in order to ensure disturbances to the prevailing hydrologic balance of the affected land and of the surrounding area and to the quantity or quality of water in surface and groundwater systems will be minimized pursuant to Rule 3.1.6.*

Protection of the hydrologic balance, and the quantity and quality of local surface and groundwater systems are accomplished in multiple ways. First of all, the location of the proposed drilling is a geological formation consisting exclusively of syenite, a coarse-grained intrusive igneous rock with a general composition similar to that of granite. This is NOT the same formation as that of Mr. Miller's well #269788. As may be seen on the attached geologic map, Mr. Miller's well is located in the bottom of La Plata Canyon, along the La Plata River, in alluvial fill overlying alternating beds of Cutler formation sandstones and siltstone with interlayered monzonite. As the younger syenite igneous material was emplaced into the older country rock and crystallized it would have a much lower porosity and permeability than the surrounding sedimentary rocks, effectively forming an aquitard. This aquitard would minimize the potential for commingling, or communication, of groundwater between the two formations.

Additionally, traditional aquifers are typically associated with porous sedimentary formations, like the Cutler, to host groundwater. By contrast, the rocks to be intersected by the proposed drilling are not sedimentary, but intrusive rocks (granites and syenites) that are typically dense or "tight", with interlocking mineral grains that have very low porosity. In areas, like around Copper Hill, where intrusive rocks are the dominant rock type, groundwater is typically fracture-controlled. Open fractures that could potentially contain water on the property are typically narrow and widely spaced and under existing drought conditions are not currently being fed by active runoff. However, if an unanticipated small fracture hosting water is encountered, the saturated zone will be sealed with bentonite. When completed, any encountered zones will have been contained through approved and mandated hole plugging methods.

The potential for hydrologic communication between the igneous and sedimentary formations is also minimized by the activities that are not being proposed. No water extraction is being proposed, so the potential for a cone of depression is eliminated. No pressure injection is proposed, so the potential for pressurized movement of water away from the drill holes is eliminated. The volume of gravity-fed water to the drillhole is limited to only the amount of moisture necessary to facilitate drilling.

Anticipating questions that might arise regarding potential impacts of exploration on surface water quality (Rule 3.1.6 (4)), Metallic currently is in the third year of a baseline surface water quality sampling program in the Bedrock Creek and adjacent drainages. The purpose of the

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sampling effort is to provide baseline information with which to contrast post-exploration conditions.

In summary, Metallic's protection measures, in conformance with Rule 3.1.6, include the following:

- The proposed drilling location isolates drilling to a low porosity geological formation.
- Operational protocol includes recycling and reuse of water whenever possible.
- Metallic's water use protocol prevents cones of depression and/or pressurized commingling of groundwater between formations.
- Metallic's water use protocol minimizes the amount of make-up water necessary for drilling.
- The operational protocol includes isolation and protection of unanticipated saturated zones that may be encountered.
- The nearest drill collar is proposed .36 miles northeast of the Miller well, at an elevation increase of approximately 750 feet.

Thank you again for the opportunity to respond. Please feel free to contact me with any comments or further questions regarding the information provided.

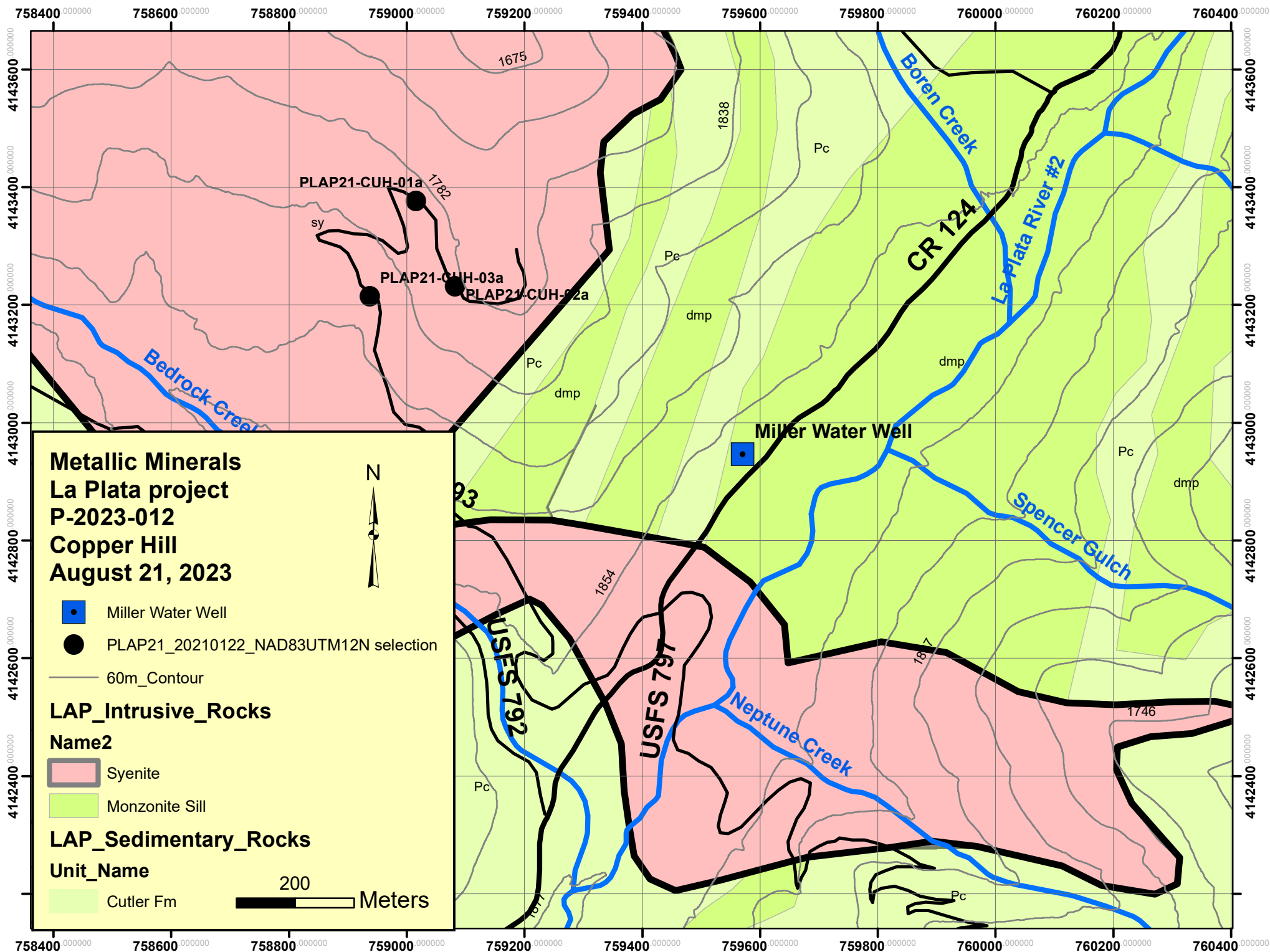
Regards,

GAULT GROUP, LLC

A handwritten signature in blue ink, appearing to read "Stephen E. Glass".

Stephen E. Glass, President

Attachments



## Permitting Action Comment OR Objection



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

### CONTACT INFORMATION

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. This form is not intended for reporting of possible violations or illegal activity.

#### Date of Comment or Objection

07/25/2023

**\*** *Indicates a Required Field*

**This form is for comments or objections on permitting actions.  
This form is not intended for requests to investigate compliance  
issues with DRMS rules.**

#### Comment or Objection \*

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

#### Contact Type \*

- ☒ Individual
- ☐ Group
- ☐ Agency
- ☐ Attorney

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

#### Your First Name \*

Thomas

#### Your Last Name \*

Miller

#### Your Address \*

8099 CR124

#### Your Address 2

#### Your City \*

Hesperus

#### Your State

CO

#### Your Zip Code \*

Maximum of 10 digits. (Example) 80202

81326

**Email Address \***

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

skiscalpel@gmail.com

**Your Phone Number \***

Used only to follow up.

9702593450

**Extension****Alternate Phone Number**

Used only to follow up.

9702590353

**Alternate Phone Extension****Connection to Operation \***

Select all that apply

- ☐ Land Owner of affected land  
☐ Mineral Owner  
☒ Adjacent Land Owner  
☐ Government Agency

- ☐ Structure Owner within 200' of affected land  
☐ Nearby Resident  
☐ Concerned Citizen  
☐ Other

**DESCRIPTION OF COMMENT OR OBJECTION**

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. This form is not intended for reporting of possible violations or illegal activity. Please be as specific as possible.

**Comment/Objection Narrative \***

Based on the written description, the proposed drilling site is close to and in the same rock formation as my domestic water well. Drilling core holes as deep as proposed has the potential to affect our water well.

**Permit Number \***

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

P2023012

**Permitting Action Type**

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

**Permit Type****County \***

La Plata

Enter one county only

**Site Name****Permittee/Operator Name**

Metallic Minerals

**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.