

November 20, 2023

Skip Blades
8441 Wild Timber Drive
Franktown, CO 80116

Division of Reclamation, Mining and Safety
1313 Sherman Street, Room 215
Denver, CO 80203

Attn: Tim Cazier, DRMS
CC: Jeffrey Parsons jeff@parsonslawoffice.com

Regarding: Tallahassee Resources Exploration Permit P2023015 - Appeal of Notice of Decision on November 14, 2023

Mr. Cazier,

I object and hereby submit a timely appeal of the Division's Office decision to Accept Hard Rock, Metal, And Designated Mining Operations NOI Tallahassee Resources LLC, Tallahassee Resources Exploration, DRMS File No. P-2023-015 and petition the Mined Land Reclamation Board ("Board") for the opportunity to participate in a Hearing on this matter.

My wife and I own three parcels of land in South T-Bar and are currently 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. Uranium drilling will significantly devalue our properties, 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".

My appeal is based upon my objection to the prospecting permit submitted by Tallahassee Resources LLC, a subsidiary company of Okapi Resources, Inc. My objection was noted on July 18, 2023, during public comment. Specifically, that "Uranium drilling has taken place previously in this area with clearly reported results."

The proposed drilling by Tallahassee Resources Exploration P2023015 is within the Hansen Uranium Deposit. Uranium Prospecting has taken place on this deposit several times since the 50's with a reported 1400+ exploratory holes being drilled.

I am surprised that the Division Office approved the permit after the Board rejected a previous permit P2009025 during the August 26, 2015 Hearing, (Attached 2015-12-02_REVISION - P2009025 - DRMS remand letter; November 15, 2015 Board Order P2009025). All documents from Hansen Uranium Project; DRMS NOI File No. P2009025 are incorporated by reference into

my objection. The Board's consideration of P2009025 is warranted, and required, because the P2009025 involved the exact same uranium deposit.

During the hearing, testimony and evidence presented at the hearing showed that extensive historic exploration of the Hansen Uranium Project through drilling core holes and feasibility studies by Black Range Minerals, that commercial quantities of uranium exist in the ore body.

In its November 17, 2015 Order, the Board specifically found that the "Applicant has analyzed the commercial viability of producing uranium at the site," and thus the proposed drilling on the Hansen Uranium Deposit was beyond the "prospecting" phase. The Board thus expressly found, as a matter of law, that the activities proposed in the third NOI Modification (MD-03) application constituted a "development" as that term is defined by the Act, thereby reversing the decision of the Division of Reclamation, Mining and Safety (Division) to approve MD-03 as mere "prospecting." The Board Order remanded MD-03 to the Division "to require submission of a reclamation permit application" for the proposed activities.

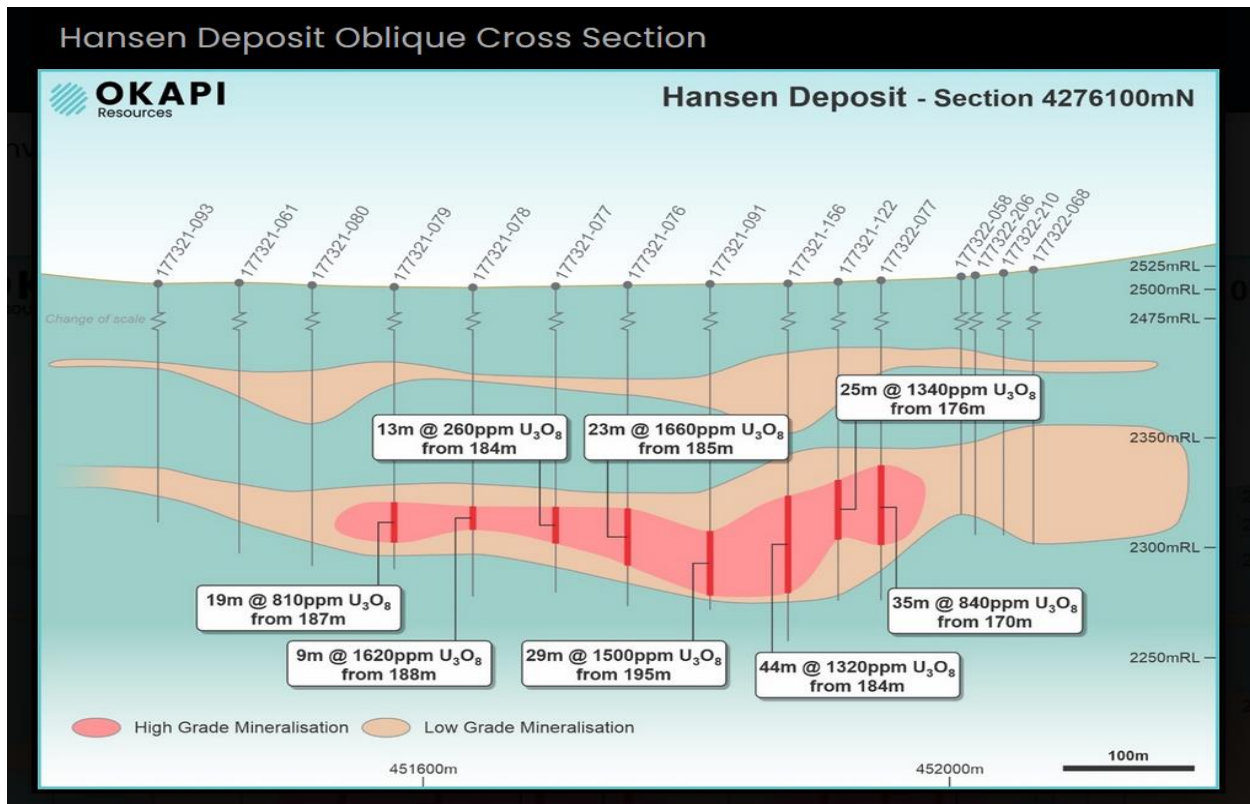
Notably, the Board made dual legal findings in its November 17, 2015 Order, finding both that because of the already-completed characterization of the deposit, any additional drilling activities go "beyond determining whether minerals exist in commercial quantities, then the activities constitute 'development,'" (paragraph 25) and that because the proposal was "aimed at testing a mining method that is not presently in common use, the activities proposed in Modification MD -03 constitute a pilot project" requiring a mining permit, not a prospecting permit (paragraph 26). Thus, given these separate and independent grounds for the Order and remand, simply because the current proposal does not contemplate a pilot project does not undermine the applicability of the November 17, 2015 Board Order to the present proposal. The extensive exploration and prospecting conducted to date is the same and requires this proposal be treated the same – as a "development" proposal "aimed at, but not limited to, preparing the site for mining, defining further the ore deposit by drilling or other means, conducting pilot plant operations, constructing roads or ancillary facilities, and other related activities" under C.R.S. § 34-32-103(4).

Simply put, Okapi Resources has extensive experience and data that uranium exists in commercial quantities; therefore, any further drilling activities should be considered Development activities.

I was surprised to learn that Benjamin Vallerine, Okapi Board Member – Technical Director, was the Black Range Minerals Board Member – Executive Director. Mr. Vallerine was heavily involved in the permitting process of the previous drilling activities by Black Range Minerals. Also, Tim Brown, Okapi US Country Manager oversaw the drilling activities at Black Range Minerals. Okapi Resources leadership has a very clear understanding of the uranium deposit from the previous drilling activity and has acknowledged on their website that there is a "rich bank of exploration data". "Uranium mineralization was first discovered in the Tallahassee Creek area in 1954. Between 1954 and 1972 sixteen small open pit and underground mines operated, with total production of approximately 80,000 tonnes of ore at an average grade of 2,500ppm U3O8, for 435,000 pounds U3O8. More than 2,200 holes have been drilled in the district for more than 350,000m which provides a rich bank of exploration data."

<https://okapiresources.com/projects/tallahassee-uranium-project/>.

Okapi Resources provides exploration details on their website referencing the Hansen Uranium deposit that further supports that they have information that proves minerals are in existence.



Referenced <https://okapiresources.com/projects/tallahassee-uranium-project/>

The MLRA definition of “development” should be given effect by the Board. I urge the Board to consider the entirety of the definition and give effect to each of the provisions enacted by the legislature, including the inclusion in the “development” definition of activities. For the Board’s benefit, the entire definition as set forth in the Act Colo. Rev. Stat. § 34-32-103 “Development means the work performed in relation to a deposit, following the prospecting required to prove minerals are in existence in commercial quantities but prior to production activities, aimed at, but not limited to, preparing the site for mining, defining further the ore deposit by drilling or other means, conducting pilot plant operations, constructing roads or ancillary facilities, and other related activities.” Okapi Resources knows uranium is present at the Hansen Uranium Deposit and is requesting the prospecting permit to determine the commercial quantities to enhance their story to investors. This is clearly not a Prospecting project, but a Development project as defined by the Legislature. Okapi Resources acknowledges the Tallahassee Project (includes Hansen) is in the Development phase on the Okapi Resources website!



Referenced <https://okapiresources.com/uranium-enrichment/#>

The Hansen Uranium Project has been explored for over 60 years. The Board ruled in the Hansen Uranium Project; DRMS NOI File No. P2009025 that the area has been “explored” and any other drilling activities are considered Development and requires a mining reclamation permit. Okapi Resources acknowledges they have a large amount of data from prior extensive drilling activities available to them and Okapi Leadership was involved in previous drilling activities. They also acknowledge the project is in the Development phase on their website.

Please don't let them destroy the beauty of South T-Bar, risk uranium exposure in the Arkansas River Basin, destroy our property values, and disturb the natural wildlife without requiring them to obtain the correct permit required by Colorado law.

Sincerely,

Skip Blades

Supporting Documentation



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

1313 Sherman Street, Room 215
Denver, CO 80203

December 2, 2015

Mr. Patrick C. Siglin
Black Range Minerals Colorado, LLC
PO Box 98
31127 Hwy 90 Rd
Nucla, CO 81424

**Re: Hansen Uranium Project; DRMS NOI File No. P-2009-025;
Notice of Remanded Decision NOI Modification 3 (MD-03)**

Dear Mr. Siglin:

On November 17, 2015 the Colorado Mined Land Reclamation Board (Board) issued its Board Order stating their conclusion arrived upon during the October 28, 2015 Hearing. During that Hearing, the Board determined activities proposed in the third NOI Modification (MD-03) application constitute a "mining operation" as that term is defined by the Act, thereby reversing the decision of the Division of Reclamation, Mining and Safety (Division) to approve MD-03. The Board Order remanded MD-03 to the Division "to require submission of a reclamation permit application" for the proposed activities. Therefore, if Black Range Minerals intends to pursue the activities proposed in MD-03, a mine reclamation permit application must be submitted and approved by the Division prior to engaging in those activities.

Regarding the revised estimated liability amount of \$176,936.00 stated in the Division's July 27, 2015 Notice of Decision letter, please do not submit any additional bond related to MD-03 at this time.

If you have any questions, please contact me (303-866-3567 ext. 8169).

Sincerely,

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

ec: Tony Waldron, DRMS
Wally Erickson, DRMS
DRMS file



Our flagship Tallahassee Uranium Project comprises five major uranium deposits in Colorado, USA with an overall JORC Resource of 49.8Mlbs U₃O₈ (average grade of 540ppm).

Located 140km southwest of Denver and 30km northwest of Canon City, Colorado, USA, the Tallahassee Uranium Project comprises two exploration leases that encompass the Boyer, Noah, Taylor, Hansen, and Picnic Tree Uranium Deposits, as well as mining claims that cover a portion of the High Park Uranium Deposit.

Okapi is focused on further expansion and consolidation in the region and has a clear strategy to expand Tallahassee's existing resource. Our on-the-ground team has a long history of working in the area.

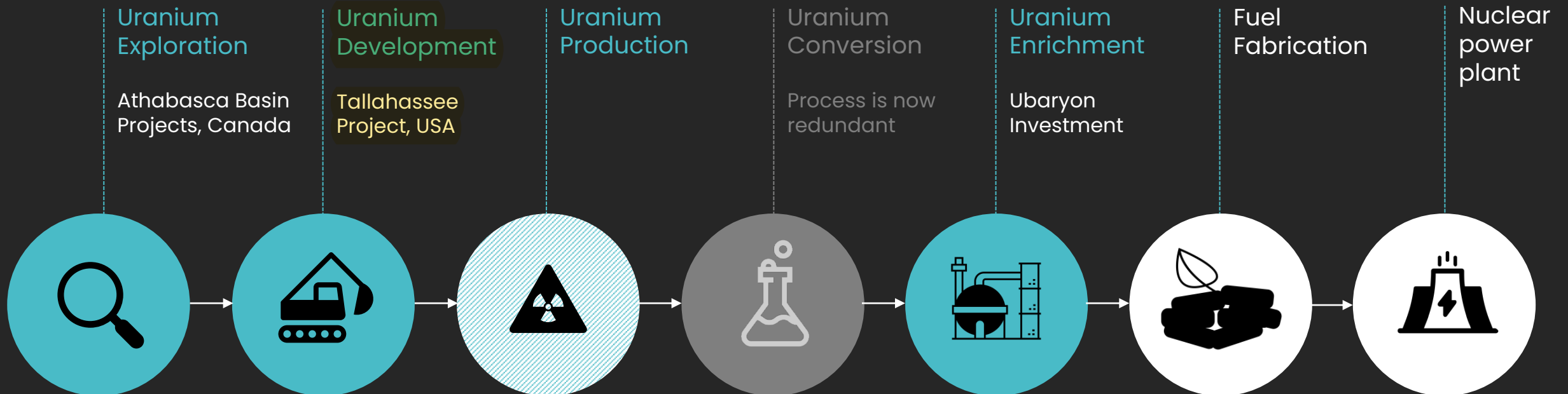
Uranium mineralisation was first discovered in the Tallahassee Creek area in 1954. Between 1954 and 1972 sixteen small open pit and underground mines operated, with total production of approximately 80,000 tonnes of ore at an average grade of 2,500ppm U₃O₈, for 435,000 pounds U₃O₈.

More than 2,200 holes have been drilled in the district for more than 350,000m which provides a rich bank of exploration data.

Okapi Opportunity Set

We now cover more steps in the nuclear energy process

Okapi's exposure to nuclear industry has been dramatically increased.



Appendix A

JORC 2012 Mineral Resource Estimate for Tallahassee Uranium Project

Property	Measured			Indicated			Inferred			Total		
	Tonnes (000)	Grade U3O8 (ppm)	Lbs U3O8 (000)	Tonnes (000)	Grade U3O8 (ppm)	Lbs U3O8 (000)	Tonnes (000)	Grade U3O8 (ppm)	Lbs U3O8 (000)	Tonnes (000)	Grade U3O8 (ppm)	Lbs U3O8 (000)
Hansen/Picnic Tree**	-	-	-	7,309	640	10,360	9,277	580	11,874	16,586	610	22,234
Taylor & Boyer	-	-	-	7,641	520	8,705	14,869	460	15,172	22,513	480	23,877
High Park	2,451	550	2,960	24	590	30	434	770	734	2,907	580	3,724
TOTAL	2,451	550	2,960	14,976	580	19,095	24,580	510	27,780	42,007	540	49,835

Notes: Calculated applying a cut-off grade of 250ppm U₃O₈. Numbers may not sum due to rounding. Grade rounded to nearest 10ppm.

**Numbers reported are 51% of the Hansen/Picnic Tree due to ownership agreements.



Corporate ▾

ASX: OKR 12.0c — 0.0%

OTC US: OKPRF 8.0c — 0.0%

Tallahassee Uranium Project

Uranium

Our flagship Tallahassee Uranium Project comprises five major uranium deposits in Colorado, USA with an overall JORC Resource of 49.8Mlbs U₃O₈ (average grade of 540ppm).

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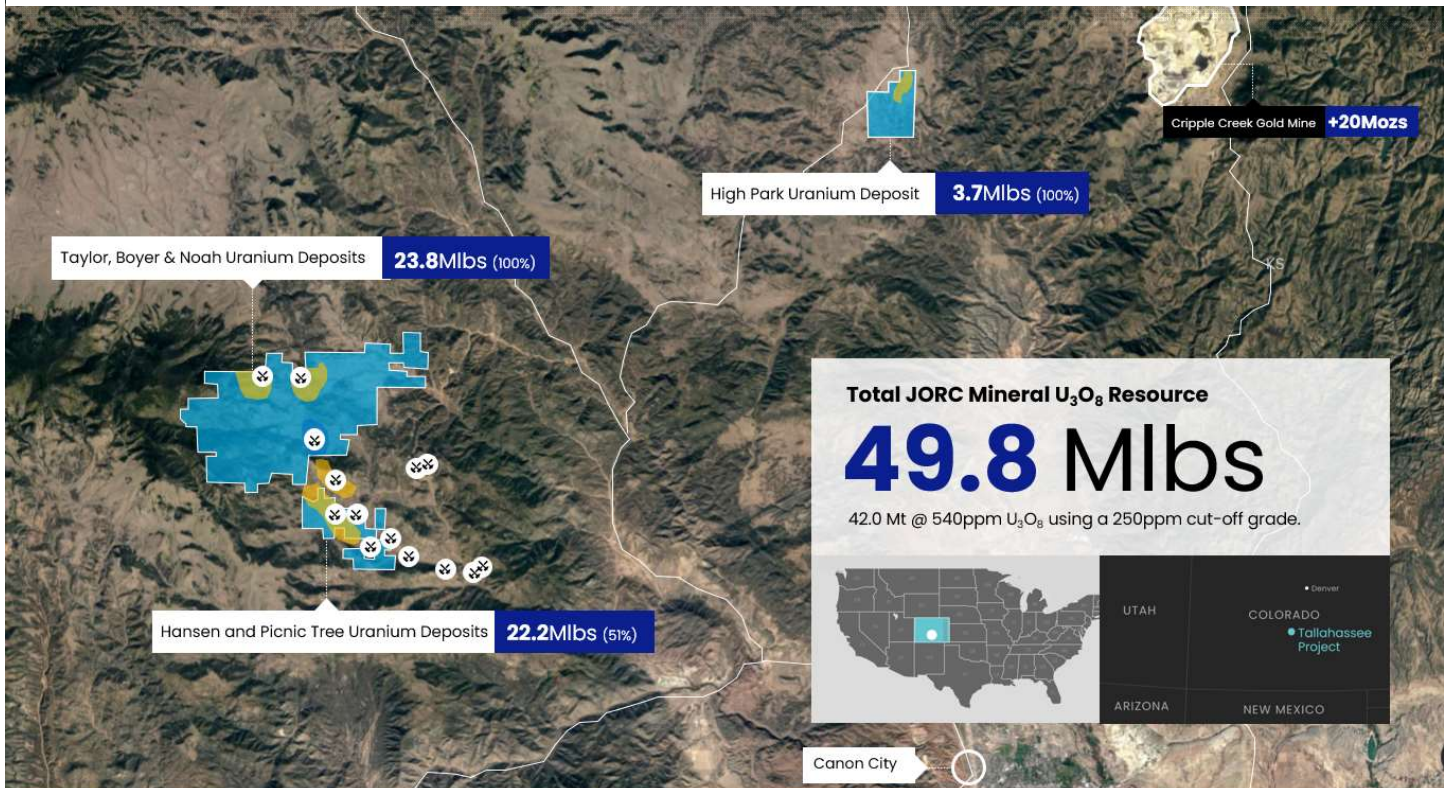


Corporate ▾



ASX: OKR 12.0c — 0.0%

OTC US: OKPRF 8.0c — 0.0%



JORC 2012 Resource by Property

■ Taylor, Boyer & Noah
 ■ Hansen & Picnic Tree
 ■ High Park





Corporate ▾



ASX: OKR 12.0c — 0.0%

OTC US: OKPRF 8.0c — 0.0%

Higher grade and laterally continuous within broader, lower grade envelopes.

- The Hansen Deposit is also hosted by the Echo Park Formation, whereas the Picnic Tree Deposit is hosted by overlying clay bearing conglomerates (Tallahassee Creek Formation).
- The High Park Uranium Deposit is hosted by an outlier of the Tallahassee Creek Formation.
- Recoveries of +95% with conventional acid leaching.

