



STATE OF  
COLORADO

Girardi - DNR, Chris <chris.girardi@state.co.us>

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## Responses to question regarding P-2024-011

1 message

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**HARALD HOEGBERG** <geohoeg@comcast.net>

Tue, Nov 5, 2024 at 3:45 PM

To: Chris Girardi <chris.girardi@state.co.us>

Cc: "Pike, James D" <jpike@blm.gov>, Jim Mackenzie <jimmackenzie@shaw.ca>, "andrewgertler@gmail.com" <andrewgertler@gmail.com>, Mark Abrams <onstrikeexploration@yahoo.com>

Hi Chris,

Attached are Viscount's responses to your questions in the letter dated October 15, 2024.

Please call me if you need additional clarification..

Best regards,  
Harald Hoegberg



**DRMS RESPONSE GIRARDI.docx**

17K

**HARALD HOEGBERG**  
**1805 TUNBRIDGE DRIVE**  
**HENRICO, VA 23238**  
[geohogeg@comcast.net](mailto:geohogeg@comcast.net)

**Mr. Chris Girardi**

**CO DRMS**

**1313 Sherman Street, Room 215**

**Denver, CO 80203**

November 5, 2024

Dear Mr. Chris Girardi.

Here are the answers to the questions you raised in your letter dated 110-15-2024 regarding the NOI for the Passiflora Project DRMS File No. P-2024-011.

1. The NOI application asks for 4/4 section definition if the area has been surveyed, which is the case here. This information was provided with the NOI application. UTM coordinates are attached. The readings are to the closes meter, which is about as accurate as my hand-held GPS is capable of measuring. Any decimal figures would be insignificant.
2. The disturbance is from accessing bore hole location with daily traffic such as sample collection, crew access, water trucks etc. The access areas will be flagged to minimize vehicular disturbance.
3. Concave mud pits will be excavated to a maximum depth of 8' to surface on both ends, and an 8'x8' surface footprint. The pits will be lined with heavy duty vinyl or other suitable material.
4. To date our drilling has not encountered significant water. In case an aquifer is encountered, a packer will be installed. To contain the water. casing and cement will be used to insulate the drill hole.
5. Please see attachment 1.
6. The drill pad calculation was prepared to show the general gradient combined with the "before" photographs, to see if the drillers though we needed to construct pad. None of the drillers thought the pads were necessary, and that the drill could be levelled using the drills hydraulics system. The "before" photographs and gradient calculations was attached to the NOI to conduct exploration for the DRMS reviewer to add support to item 5, in the application.  
It seems that the disturbance of 0.5 acres was calculated and includes the 5 drill pads, since drill pads will not be needed the 0.25 seems more accurate.

7. If topsoil is encountered it will be stock piled and replaced as part of the hole completion. No topsoil has been encountered during Viscount's drilling programs beginning in 2016. If stockpiles are left in place for more than 180 days, they will be seeded with the seed mix recommended by CSU's Extension Program to the BLM for the 2017 drill program.
8. No sandy loams have been encountered to date during the drill programs, and no topsoil has been stockpiled. The only agricultural activity is a small amount livestock grazing. A test pit dug during the gradient survey only revealed residual clay soils. The drill sites are located on a ridge that is underlaid by eroded phyllic altered rhyolites, consisting mostly of sericite and argillic material. The area may have been mapped as containing the sandy loams, but it is not clear what scale those maps were drawn at. The area under consideration only spans about 750m and follows the ridge line.
9. The broadcast method and seed mix proposed by the CSU Extension survey used in all drill campaigns is the one listed in the NOI and the reclamation of previously drill sites have been deemed successful by the DRMS.
10. Please see answer 6. Above.
11. A topographic map of the drill hole locations is enclosed.
12. We have reviewed your reclamation cost estimate and we do not concur. It is over 420% higher than the cost estimate calculated by BLM.s Daniel Pike, with which we agree. Our calculations, based on our experience since 2016, were around \$12,000.

Sincerely ,

Harald Hoegberg

Consulting Geologist for Viscount Mining.

DRILL HOLE COORDINATES  
PASSIFLORA PROJECT

NAD 83

HOLE ID	LONG	LAT
PF 1	460477	4224139
PF 2	460792	4224193
PF 3	460209	4224199
PF 4	460055	4224028
PF 5	460701	4224221

**ENVIRONMENTAL MANAGEMENT**  
**SPILL CONTROL PLAN**

## **ENVIRONMENTAL MANAGEMENT SPILL CONTROL PLAN**

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# ENVIRONMENTAL MANAGEMENT

## SPILL CONTROL PLAN

### 1.0 Scope

This program has been developed in accordance with 40 CFR 112 with the intent of developing a heightened level of awareness regarding safe work practices when working with or transporting chemicals which pose a spill release hazard with a potential to damage persons, property or the environment. These procedures establish an approved course of action to be implemented in the event of a spill. These procedures have been made as specific as possible, however, since the source of all spills cannot be predicted, specific remedies should be determined based on field conditions.

Clients may have their own policies, procedures and forms. Where it is a requirement that client procedures and forms are used, it will be in addition to those required by this section.

### 2.0 Definitions

- **"Navigable Waterway"** any course of water (flowing or dry) that is able to or leads to a body of water capable of carrying boat traffic.
- **"Reportable Quantity"** amount of a spilled material that requires a report to a government agency after a spill or release.
- **"Sorbent"** any kitty litter, pads, booms or material designed to absorb a petroleum or chemical product.

### 3.0 Legislative Requirement

Under the environmental legislation of 40 CFR 112 procedures must be established to protect the environment from chemical hazards. At a minimum, policies will meet the applicable spill prevention and reporting requirements. By implementing the procedures stated personnel will ensure safe operations, no damage occurs to the environment and compliance with EPA regulations.

### 4.0 Policy

All employees will receive spill prevention and clean-up training required by and adhere to all requirements outlined under this policy.

All contractors and subcontractors engaged will be required (at a minimum) to comply with the requirements of this plan.

### 5.0 Responsibility

*All employees* have the responsibility to follow this policy. They will also utilize all environmental protection methods at their disposal. Any spills will be reported immediately. Failure to follow this policy will result in disciplinary action up to and including dismissal.

*Field Supervisors* have the responsibility to ensure good environmental management, spill prevention and countermeasures are implemented. They must also ensure control supplies are available as required by this policy. Field Supervisors will also have the responsibility for knowing and following all client-required procedures and reporting all spills immediately.

# ENVIRONMENTAL MANAGEMENT

## SPILL CONTROL PLAN

PMC . IG Drilling Safety evaluates the legislative reporting requirements of spills and will schedule auditing of the program to ensure compliance by Operations and identify needs for revision.

*Management* and the *PMC / IG Drilling President* will review all reports. It is the responsibility of management to administer disciplinary action to any employee not adhering to the requirements of this program.

### 6.0 Procedures

#### 6.1 Containerized Materials in Transport

Containerized materials with spill potential which may be transported to and from sites are expected to be petroleum products including gasoline or diesel fuel. These materials will be transported only in DOT approved containers.

When transporting hazardous materials a spill response kit is required to be on the transporting vehicle. A spill response kit needs to contain the following:

- ✓ Fire extinguisher
- ✓ First aid kit (with Blood borne pathogen kit)
- ✓ Sorbant material (in sufficient quantities to contain the anticipated spill)
- ✓ Containers for disposal of spilled material

The sorbant material (i.e. sorbant booms and/or towels, kitty litter or vermiculite) must be in sufficient quantity to handle the liquids present.

The driver of the vehicle needs to ensure that a bill of lading has been properly filled out for all hazardous materials that are being transported. The bill of lading needs to be kept in a door pocket in the vehicle cab. In addition, employees need to ensure that all individual containers are properly labeled and SDS are available for all hazardous materials being transported.

#### 6.2 Emergency Response Procedures for Hazardous Materials Transportation Incidents

In the event of a large spill or one that can not be adequately contained and remediated, notification must be made immediately to PMC / IG Drilling Safety. The person reporting will need to give the proper shipping name of the hazardous material(s) involved and the nature of the problem, including the UN or NA number, to the appropriate authorities or responders. Be aware of the following conditions when gathering information for reporting:

- ✓ Name of caller and call back number
- ✓ Location of spill
- ✓ Substance released
- ✓ Estimated quantity of release
- ✓ Response action under way
- ✓ Shipper and manufacturer of product
- ✓ Local conditions



## ENVIRONMENTAL MANAGEMENT

### SPILL CONTROL PLAN

- **IMMEDIATE** notification of hazardous material incidents which involve any of the following conditions is required. Be aware of these conditions when gathering information for reporting to PMC / IG Drilling Safety.

DOT Hazardous Material Incident - when the material is directly responsible for:

- Death of a person(s).
- Injury of any person(s) requiring hospitalization.
- Estimated property damage exceeding \$50,000.
- An evacuation of the general public lasting one or more hours.
- Shut down of one or more major traffic arteries or facilities lasting one or more hours.
- Alteration of routine flight pattern of aircraft.
- Fire, breakage, spillage or suspected contamination involving a shipment of radioactive materials.
- Fire, breakage, spillage or suspected contamination involving a shipment of etiologic materials.
- Discharge of hazardous materials into a navigable waterway.

#### **Emergency Response Information:**

**VISCOUNT MINING**

**750 W Pender St #250**

**Vancouver, BC V6C 2T7**

#### **6.3 Containerized Material Present on Site**

Containerized materials with spill potential which may be used or stored on site are expected to be gasoline, diesel fuel, well treatment chemicals, decontamination liquids and/or groundwater. These materials will be stored only in approved containers. Investigation generated liquids such as decontamination water and/or groundwater will be placed in DOT approved drums and stored in appropriate holding areas onsite.

If bulk fuel storage tanks are present on site, a secondary means of containment, such as dikes or catchment basins, should be furnished for the largest single compartment or tank. The secondary containment must be capable of containing 110% of the largest tank within the containment area. At a minimum, one of the following preventative systems or its equivalent must be used:

- ✓ Dikes, berms or retaining walls sufficiently impervious to stored material
- ✓ Curbing
- ✓ Culverts, gutters or other drainage system
- ✓ Weirs, booms or other barriers
- ✓ Spill diversion ponds
- ✓ Retention ponds
- ✓ Sorbent materials

## ENVIRONMENTAL MANAGEMENT

### SPILL CONTROL PLAN

#### 6.4 Advance Planning

Prior to the start of site investigation, an assessment of the site will be made with regard to containerized material handling and storage. Particular attention will be given to:

- All PMC / IG Drilling job sites will be equipped with a spill response kit. This kit will be easily accessible and include the following in quantities for type and amount of material on site:
  - Fire extinguisher
  - First aid kit
  - Sorbent material (booms, towels, kitty litter or vermiculite)
  - Container for disposed materials and sorbent
  - Container must meet applicable Federal, state and local regulations
- All PMC / IG Drilling equipment which carry or uses gasoline, diesel fuel, motor oil, hydraulic fluid, or antifreeze will be checked and verified to be free of leaks prior to arriving on the job site. During this inspection, any fluid lines that are leaking or appear worn should be replaced.
- If a piece of equipment is to remain on site for an extended period of time, it will be placed on a sheet of at least 6mm vis-queen. The viz-queen shall be slightly larger than the equipment and be bermed around the edges to contain any spills released during the project.
- All flammable liquids stored on site will be stored in containers that meet National Fire Protection Association (NFPA) and Occupational Safety and Health Association (OSHA) requirements. Secondary containment will be used as necessary.
- Chemical substances should be stored in proper containers and labeled to minimize the potential for a spill. Whenever possible, chemicals should be kept in closed containers and stored so they are not exposed to stormwater.
- Any transfer of flammable materials will be done with grounding and bonding of containers in place.
- Any material that has leaked from a piece of equipment will be cleaned up immediately. Spills should be cleaned up in accordance with the "Spill and Leak Procedures" section of the Safety Data Sheet. Good housekeeping shall be maintained at all times.
- Exposure to a spill or volatile release may result in an injury or illness requiring medical attention. In planning for this contingency, the following should be addressed:
  - Name, address and phone number of the nearest medical facility will be conspicuously posted. Directions to the facility will be available.
  - Confirmation of the medical facility's ability to handle hazardous material emergencies should be obtained before the incident.
  - If the site is classified as environmental, the emergency facility will be given a copy of the health and safety plan for use in the event of an emergency.
  - Ambulance, fire and police services will be provided through the 911 dispatcher. Telephone numbers and procedures for obtaining these services will be conspicuously posted.

## ENVIRONMENTAL MANAGEMENT

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- Medical personnel will be made aware of any hazardous materials the employee has been exposed to.

In addition, the following items will be included as part of advanced planning:

- Emergency equipment locations
- Decontamination station locations
- First aid kit locations
- Emergency shower and eye wash locations
- Hazard area boundaries
- Evacuation routes
- Site accessibility
- Work area locations

#### 6.5 *Training*

Employees must be instructed on the proper response procedures for spilled materials. The training should include materials available for use, proper waste disposal, and communication procedures. All personnel will be provided with training in the following subjects:

- ✓ Hazardous waste operations as specified in 29 CFR 1910.120
- ✓ Hazard recognition
- ✓ Standard operating procedures
- ✓ Emergency signals (i.e., how to summon help, information to give, etc.)
- ✓ Evacuation routes
- ✓ Where to report when an alarm sounds
- ✓ Communication methods and signals
- ✓ How to call for help
- ✓ Spill clean-up procedures
- ✓ Emergency equipment and its location

#### 6.6 *First Aid/Emergency Medical Treatment*

In the event of a spill which results in employee exposure, (skin, eyes or inhalation), first aid or emergency medical treatment may be necessary. At least one person on each field team should be trained in first aid and CPR, and will be capable of administering these services during an emergency. General guidelines for first aid procedures can be found in the DOT Emergency Response Guidebook. Specific first aid procedures for chemical exposures can be found in the Safety Data Sheets.

#### 6.7 *Emergency Procedures*

The following are minimum steps to be taken in the event of a spill. Additional steps or combinations of steps may be needed depending on the type of emergency (i.e., fire) and the amount of release.

- ✓ Sound emergency signal
- ✓ Keep unnecessary persons away, isolate the hazardous area and prevent entry
- ✓ Stay upwind, keep out of low areas

## ENVIRONMENTAL MANAGEMENT

### SPILL CONTROL PLAN

- ✓ Do not allow any flares, smoking or open flames in or near the hazard area
- ✓ Keep combustibles away from the spilled material
- ✓ Immediately take steps to contain the spill and prevent potential migration of contaminants
- ✓ Complete necessary documentation

#### 6.8 *Spill Control Measures*

In the event of a spill, immediate measures should be taken to contain the spill and prevent potential migration of contamination. General spill control actions which could be implemented include:

- Small Liquid Spills - Absorb with sorbent material, including sand or clean fill. Place contaminated material into a DOT approved drum, cover and label.
- Large Liquid Spills - Immediately dike the area surrounding the spill or create some type of obstruction to prevent the spill migration. Absorb the spill with an absorbent material, including sand or clean fill. After all free liquid is absorbed, remove the material and underlying contaminated soil. Place contaminated material into a DOT approved drum, cover and label.

#### 6.9 *General Environmental Management Practices*

The following best management practices will be implemented to ensure PMC / IG Drilling is an industry leader in environmental management.

- Trash and other refuse materials will be contained and disposed of on a daily basis. When possible, drill crews will separate recyclables and dispose of them for recycling.
- Hazardous materials will be disposed of per client, local, state or federal regulations. At a minimum, containers will be cleaned of residue prior to disposal and pressurized cans will be punctured and crushed.
- Off road travel and other environmental impact will be kept to a minimum.
- Water discharge issues will comply with all aspects of the Federal Clean Water Act.
- Equipment will be properly maintained to keep exhaust air discharge to a minimum.
- All applicable dust suppression measures will be taken. Where certain municipalities have local dust suppression requirements, these will be followed.
- When applicable, construction site erosion control will be implemented.
- The employer must estimate the waste that will be generated prior to work being performed so that the need for containers and waste removal, if necessary, can be determined.
- Waste materials should be properly stored and handled to minimize the potential for a spill or impact to the environment. During outdoor activities, receptacles must be covered to prevent dispersion of waste materials and to control the potential for run-off.
- Employees must be instructed on the proper disposal method for wastes. This may include general instruction on disposal of non-hazardous wastes, trash, or scrap materials. If wastes generated are classified as hazardous, employees must be trained to ensure proper disposal.

## **ENVIRONMENTAL MANAGEMENT SPILL CONTROL PLAN**

### **6.10 *Record keeping***

After a spill, the Field Supervisor should document the incident. At a minimum, the following should be included:

- ✓ Chronological history of the incident
- ✓ Facts about the incident and when they became available
- ✓ Titles and names of personnel; composition of teams
- ✓ All actions taken, reasoning and persons involved
- ✓ Photos

All records should be retained by Viscount Mining for 1 year.