

Cazier, Tim

From: Lee J Alter [alterconsult@starband.net]
Sent: Monday, April 16, 2012 8:06 AM
To: Kaldenbach, Tom
Cc: Cazier, Tim; sscarter@blm.gov; bill.giordano@fremontco.com
Subject: P-2009-025 Modification Request
Attachments: Ltr TAC -DRMS 04.16.12.pdf

Mr. Kaldenbach

Please see the attached letter from the Tallahassee Area Community regarding the NOI modification request submitted by Black Range Minerals.

Lee J Alter



Tallahassee Area Community, Inc.

Fremont County, Colorado

Board of Directors
P. O. Box 343
Cañon City, Colorado 81212
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April 16, 2012

Mr. Tom Kaldenbach
Environmental Protection Specialist
Division of Reclamation Mining and Safety
1313 Sherman Street , Room 215
Denver, CO 80203

Via Email Attachment (tom.kaldenbach@ state.co.us)

Re: P-2009-025, Request by Black Range Minerals for Modification of NOI, April 5, 2012

Dear Mr. Kaldenbach:

The Tallahassee Area Community , representing residents and property owners in the immediate vicinity of the Black Range Minerals prospecting project, has a number of inquiries and concerns regarding the requested modification of the NOI.

Although not identified in Mr. Siglin's letter, it seems apparent that the procedure requested is an experiment to evaluate the effectiveness of borehole mining (BHM). Black Range has publicly stated its interest in possibly utilizing this technique for a part of their Hansen/Taylor Ranch Uranium Project. (<http://www.blackrangeminerals.com/pdfs/CMANationalWesternMiningConference21Mar12.pdf>).

The EPA has described BHM as a combination of conventional and *in situ* mining techniques and we are concerned that it poses a similar threat of groundwater contamination as does *in-situ leach* uranium recovery. We respectfully request that you ask Black Range for considerably more information as to the specific nature of their experiment prior to your consideration to approve or deny the NOI modification.

Our questions and concerns are as follows:

1. Would a modification of this NOI make it subject to the recent hardrock mining rules change? NOI P-2009-025 was originally filed prior to the September 30, 2010 effective date of the new prospecting rules.
2. Mr. Siglin is not very specific when he refers to the use of an "air or fluid" drill rig. BHM utilizes the injection of high pressure water into the bore hole at the rate of many hundreds of gallons per minute.
3. Published BHM procedure includes the casing of the vertical bore hole down to the operating depth, however the space that the "underreamer" carves out of the target ore body, embedded in sandstone, is uncased which could result in the high pressure water being forced into the aquifer.

4. As reported in a study by USGS of the geology of the Tallahassee Uranium District published in the 1980s, which included the Hansen site, there is a significant concentration of iron pyrite in the ore body.
5. Depending on the resulting pH and other conditions in the "cave" during the course of the experiment, it is possible that a significant fraction of the insoluble uranium dioxide would be converted to the soluble uranium state by reaction with the iron sulfides and be carried by the migrating water into the aquifer and nearby domestic water wells.
6. Anecdotal reports about the past small scale open pit mining operations in the area as well as from the 1970s Cypress Mines extensive exploratory drilling program suggest that significant flooding of the bore hole is possible in the course of this experiment, leading to an increased potential for groundwater contamination.
7. Black Range has not constructed any monitoring wells and has not attempted to establish a pre-prospecting groundwater quality baseline. They have recently received a permit from DWR to reopen some of the 30+ year old Cypress monitoring wells. Since the Black Range consulting hydrologist has publicly cautioned about the unreliability of groundwater quality data from wells constructed with unknown techniques, and since DWR regulations require the use of current standards for monitoring wells, we are concerned about the ability to determine any potential adverse environmental impact from this experiment.
8. Currently, Black Range does not have the authority to use any local natural water source and has been purchasing bulk water from the Cañon City Water Department for their prospecting under this NOI. In view of the continuing drought conditions in Fremont County and the prospect of water usage restrictions by the Department later this year, there is a real possibility that the water required for this experiment may not be available.

Thank you for your attention and I look forward to your response.

Respectfully submitted,

Lee J Alter
Chairman, Government Affairs Committee
Tallahassee Area Community, Inc.

cc via email:

Tim Cazier (Colorado DRMS) (tim.cazier@state.co.us)
Stephanie Carter (BLM-Royal Gorge) (sscarter@blm.gov)
Bill Giordano (Fremont County) (bill.giordano@fremontco.com)