



March 28, 2019

Stephanie Carter, Geologist
BLM, Royal Gorge Field Office
3028 East Main Street
Cañon City, CO 81212

RE: Dawson Mountain COC077472
Response to request for information dated March 1, 2019

Dear Ms. Carter,

Please accept this response to the March 1, 2019 correspondence.

1. Total BLM surface disturbance since 2013 is approximately 1.46 acres. Approximately 1800 linear feet of new exploration road with an average width of 34 ft. for 1.40 acres has been constructed. Approximately 650 ft. of trench with an average width of four feet for 0.06 acres has been cut. Approximately 20 lbs. of bulk sample were removed from each trench for a total of 350 lbs.

2. Zephyr is sensitive to timber resource management procedures on public land. To date, timber management has been limited to Zephyr's patented claims.

3. Borings are proposed at the end of the Sentinel Roads denoted by the pink line on the map included with the NOI-Mod-04 application. It is anticipated that two borings will occur near the end of each road. Borings are anticipated to a depth of approximately 400 and 800 ft. with a diameter of 4 inches or 1360 ft³ (1700 lbs.). The current trenches are on Zephyr's patented claims. No additional trenching is anticipated in this area. Drilling and borehole abandonment processes will be consistent with previously proposed, approved and executed approaches.

4. The exploration proposed in Mod-04 will likely be conducted in two phases. First road construction is expected to occur during the summer or early fall of 2019. Drilling is expected to take place in the summer or fall of 2020. There is a possibility of additional drilling dependent on initial assay results. Reclamation will be dependent on additional drilling and performed after all exploration is complete.

5. Mud pit construction, management of drilling fluids and reclamation will be the same as was proposed in MD-03.

Environmental Alternatives Inc.

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6. The proposed Sentinel Road may cross an existing recreation trail during the summer and early fall of 2019. The exact timing will be determined after the Colorado State Land Board hearing on April 11, 2019 and the Colorado Division of Reclamation, Mining and Safety board meeting on April 24, 2019. Zephyr commits to providing the requested detail no less than 30 days prior to any disturbance.

In addition, depending on the outcome of the CO State Land Board hearing on April 11, 2019 and the DRMS NOI Mod-04 board meeting on April 24, 2019, Zephyr will either reclaim the Windy Point trenches and road or submit a Plan of Operations for borehole exploration.

Please feel free to contact me with any further questions.

Respectfully submitted,



Angela M. Bellantoni Ph.D.



CC: Loren Komperdo
Will Felderhof
David Felderhof