



# United States Department of the Interior



BUREAU OF LAND MANAGEMENT  
Royal Gorge Field Office  
3028 East Main Street  
Cañon City, Colorado 81212

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COC 080006

DEC 23 2019

Zephyr Gold USA Ltd. :  
Attn: David Felderhof :  
1301-1959 Upper Water Street, : Surface Management  
Purdy's Wharf Tower 1 :  
Halifax, Nova Scotia B3J 3N2 :  
Canada :

## ADDITIONAL INFORMATION NEEDED

Dear Mr. Felderhof,

The Zephyr Gold USA Ltd. (Zephyr) Plan of Operations to conduct exploration activities in the Dawson Mountain area of Fremont County was originally received in this office on June 21, 2019. Additional information was received on November 25, 2019.

Consistent with the surface management regulations at 43 CFR 3809.311(c), the BLM has reviewed the Plan of Operations to determine if your operation prevents undue or unnecessary degradation (UUD), as well as prevention of the impairment of suitability of lands under wilderness review for inclusion in the wilderness system. Based on our review, the following information is still needed from Zephyr, in order for BLM to continue processing the Plan of Operations.

### Operations

1. Please provide information on how Zephyr plans to prevent impairment of the suitability of lands under wilderness review for inclusion in the wilderness system for the following locations located within the Lower Grape Creek Wilderness Study Area.
2. Provide a reclamation estimate for the proposed exploration activities.
3. Specific locations for drill holes and the additional staging pad will need to be identified, in order for BLM to conduct adequate resource assessments.
4. Provide hours and days of operation for exploration activities, as well as an update for the timeframe on when this work is anticipated to take place.
5. If operations will take place during evening/night hours, please provide details on equipment and site lighting.
6. A 500' setback was provided for Grape Creek. Please also provide information on other waterways that will be in close proximity to the potential new access road construction in the Green Mountain area, from County Road 3A and all drilling locations.

7. Provide the updated Stormwater Management Plan, as well as applicable permits with the Colorado Department of Public, Health and Safety. This information needs to apply to the potential new road construction in the Green Mountain area, road construction from County Road 3A, as well as the drilling and staging locations (as applicable).
8. Please clarify what type of safety controls will be utilized during times when the drilling rigs may not be manned. In addition, any other pertinent safety and security protocols (such as signage, guards, fencing, etc.).
9. Provide additional details on access road and berm construction that may be needed in the Green Mountain area, similar to Figure 3 previously provided for access from County Road 3A.
10. Provide a complete list of all equipment (pickup, drill, generator, helicopter, etc.) that will be utilized in this exploration operation. Be sure to include year, make, model and function.
11. As there is proposed road construction from County Road 3A and also in the Green Mountain area, please provide details on topsoil stripping, stockpiling and stabilizing, as applicable.
12. Clarify if plastic tubs will still be utilized for the management of drill mud and cuttings.
13. Prior exploration notices stated that equipment would be refueled by a diesel truck. For helicopter access only areas, provide the process for refueling, fuel storage (if applicable) and management of potential spills.
14. Provide information on how solid and sanitary waste will be managed and disposed of offsite.
15. A weed plan was referenced previously, but not submitted. Please provide this plan to BLM.
16. Provide information on the source of water that will be used for drilling. In addition, provide details on the management and discharge, as applicable.

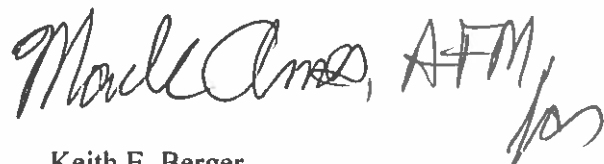
#### Reclamation

1. Provide additional details on area monitoring, to ensure adequate final reclamation has been established.
2. An estimated timeframe and sequence for the initiation and completion of final reclamation needs to be provided.
3. Provide specific details for timeframe of recontouring, seeding/planting and monitoring of the Windy Point trenches.

Until a complete Plan of Operations is filed with this office, the BLM is unable to determine that your proposed operations will not result in unnecessary or undue degradation or impairment of suitability of lands under wilderness review.

If you have any questions, please contact Stephanie Carter at 719-269-8551.

Sincerely,

A handwritten signature in black ink, appearing to read "Keith E. Berger" with "AFM" written to the right and a flourish below.

Keith E. Berger  
Field Manager  
Royal Gorge Field Office

cc: Tim Cazier, CDRMS