

From: [REDACTED]
To: [F3-comments-rocky-mountain-black-hills-hell-canyon](#)
Cc: [REDACTED]
Subject: [External Email]Newark Exploration Drilling Project;
Date: Friday, February 17, 2023 9:43:09 PM

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I have the following concerns, questions and comments.

- 1) I'm a mining engineer and I understand and appreciate the Mining Law of 1872. I own land in South Dakota and own mining claims in several states.
- 2) However, I have observed drillers and drilling companies in over 20 countries and quick frankly most of them messy slobes and safety rules.

They are drilling on the clock as time is money and they take short cuts, spill grease, oil, fuel etc and litter. I've worked in Wyoming, Illinois, Colorado, California, Nevada and Arizona and see the same issues as overseas.

- 3) Not have a porta-potty at the drill site, seriously! You actually think they are going to shut down the drill (or operate it unsafely) and drive back to the staging area to pee? Dream on. Time is money and they will just pee where they are but since drilling deep holes can take days each of them will be peeing on a regular basis many times.
- 4) I'm concerned about the lack of mention in the plan of operations for the intersection of water table(s), artesian flow, etc. How will cross contamination between various aquifers in the same hole be handled?
- 5) The PDF claim map appears to have some issues with the cyan/blue claim boundary not aligning properly with several of the private land areas which straight edges. There are claim polygons show on top of private land, is this because F3 owns the mineral rights?
- 6) The actual mining claim boundaries and AMC numbers are not shown on the maps. What evidence is there to support F3 Gold's claims. We need to see better detailed maps of the land ownership, the topography, contours, aerial photos, etc to have a better understanding of what the proposed land disturbances will be and how they interact with the terrain.
- 7) The boundaries on these PDF maps should be available as Google Earth KLM or KMZ objects so the average person can view the area, be able zoom in to see terrain, land ownership, etc.
- 8) No mention was made of noise abatement. It was stated that drilling would be 24/7 for as long as it took to drill the holes (up to 3,000 feet).
- 9) No mention was made of possible interaction with livestock (cows, horses) in the area (it's probably under grazing permits).

- 10) All refuse, solid waste, garbage, or trash associated with this Plan of Operations will be removed from site on a regular basis and disposed of in proper disposal containers or sites. This makes it sound like they are going to throw their trash in somebody's dumpster in when nobody is looking? Are they going to hire the local trash company to put a dumpster out at the laydown sites?
- 11) No mention was made of interaction with placer mining claims or their claim holders.
- 12) All drill holes will be capped, sealed and plugged per ARSD 74:11:08 regulations following the completion of each drill hole. The text for ARSD 74:11:08 should be included rather than forcing the read to go search for that regulation.
- 13) There are no known cultural resources within the project area. Which entity has made this determination. I've herded cattle on upper French Creek and have seen some historical objects. What is the definition of a "cultural resource" and why wasn't it included in the POO?
- 14) Will the drilling crews and other staff be staying in campers or motor homes on the claims or in the forest or will they be commuting from Custer, Hill City, Rapid City, etc? I'm more concerned if they are camping or living on the claims for the project and the associated potential impacts.

Sincerely,

Michael Lee Pagel
BS Mining Engineer SDSM&T 1984

