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Hell Canyon Ranger District

I've attached a pdf copy of our comments on the Newark Exploration Drilling Project, for your consideration.  
Thank you for the opportunity to share these.

Kathleen Homer and David Homer, PhD.

Comments on F3 Newark Exploration Project February 14, 2023 Submitted by David Homer, PhD., and Kathleen Homer

1. We realize this project is at the initial planning stage and has not moved to the next step in the NEPA process. However, as current property owners less than .5 mile of the project boundaries, we are concerned by the potential for cultural, social, ecological, historical, and environmental impacts due to this project and any resulting follow-on projects. We are also concerned that the Government has adequate resources to manage this project.
2. The Scoping Letter and Plan of Operations indicate County Road 286 (Upper French Creek Road) and National Forest System Road 781 (Wabash Spring Road) will be used for access, both via US Highway 16. Additional roads anticipated to be used for access include Roads 654, 654.1A, 654.1B, 504, and 781.1G. It also mentions temporary access roads will be constructed for some locations and that these temporary roads will be obliterated by F3 Gold following completion of the activities. How will the Government ensure 1) F3 Gold adequately identifies and addresses their damage to existing roads, and 2) F3 Gold adequately "obliterates" temporary roads, returning the areas to their natural state?
3. Similarly, the Plan of Operations states drill pad sites will be "reclaimed" upon completion of all drilling activities. How will F3 Gold be held accountable for these activities?
4. The Scoping Letter and Plan of Operations state the maximum footprint of each drill site is 0.06 acres. How will this be enforced to ensure it is not exceeded?
5. Noise from day-to-day operations, an increase in traffic on public roads, and drilling activities will all be immediate impacts to the area. In addition, the Plan of Operations states drilling will be around the clock, 24 hours a day, broken into two 12-hour shifts. There are dozens of homes on private property within walking distance to some drilling locations, and within a short hike to others. However, there is no mention of noise management in the Plan of Operations.
6. There are trails within the project area. The Scoping Letter and Plan of Operations make no mention of Health and Safety procedures relevant to the potential for hunters and/or hikers while exploratory actions are going on.
7. The Scoping Letter and Plan of Operations make mention of water tanks for storage; the Plan of Operations also states that petroleum products, oils, lubricants, and fuels including gasoline will be onsite for refueling the drill rig and lubricating mechanical parts. A Spill Prevention Control and Countermeasures Plan (SPCC) was not included. How will the Government ensure that an adequate SPCC plan is prepared and reviewed prior to use of

hazardous materials and substances?

8. The Plan of Operations states that in the event of a reportable quantity spill, the spill will be reported to the U.S. Forest Service and SD Department of Environment and Natural Resources. How will the Government ensure this requirement is enforced? This is particularly important in an area where there are 1) groundwater drinking water wells close by, and 2) potential risks for wildfires.

9. The Plan of Operations makes no mention of emergency management procedures in case of fire resulting from sparks generated by equipment. A wildfire could quickly spread to private property and destroy dozens of homes.

10. Private groundwater wells are present within a short distance of proposed drilling locations. The public should be provided with hydrogeologic modeling to demonstrate any potential for contamination to surface water, and locally used groundwater aquifers (alluvium and bedrock).

11. How will the State and Federal governments fulfill their responsibilities to monitor and address potential long-term impacts of the exploratory activities, and hold the exploration company accountable? How can we be reassured that F3 Gold has the financial resources to fulfill any potential long-term responsibilities?