

To:
Sierra Vista Ranger District
District Ranger, c/o Rick Goshen
4070 S. Avenida Saracino
Hereford, AZ 85615

From:
Sheila Baron and Kenneth Clauson
Owners of lots #4 and #7 within the Duquesne Subdivision, Patagonia, AZ
211 Eagle Road
Jemez Springs, NM 87025

Date: October 14, 2020

Re: Project ID Number: 2810-030503-POO-2020-001

As nearby property owners, we appreciate the opportunity to outline our grave concerns about the Plan of Operations (PoO) for the “San Antonio Project”, the exploratory drilling operation being proposed by IC Exploration, LLC. The Forest Service, in inviting public comment, has rightfully acknowledged that citizen-owners, with a vested interest in their public lands, should have a voice in how those lands are utilized, even as the law does not strictly require a public comment period and even as IC Exploration, LLC has attempted to limit public input.

We understand that the Forest Service cannot respond to concerns beyond the proposed exploratory drilling project. However, we must not be naive about the the ultimate goal of this project and where it could lead. The mining claims currently owned by Barksdale encompass over 6,500 acres. An expanded drilling operation such as IC Exploration quite obviously has in mind would have grave and irreversible impacts on the environment, on wildlife and on the quality of our lives here.

Below are questions and concerns shared by us and fellow landowners:

- Who is ultimately responsible for the activities being proposed and who is funding these “exploratory” operations? The PoO submitted to the FS lists IC Exploration, LLC (with nothing more than a PO Box address), but IC Exploration, LLC is not registered with the Arizona Corporation Commission as an Arizona business entity. Many of the residents and users of the area have been contacted by Barksdale Resources (Barksdale) as the company behind these exploratory activities.
- Why is Barksdale not listed anywhere in the PoO?

- Why is it not clearly stated that Barksdale is a Canadian (not US-based) company? Are they trying to hide where the funding is coming from for this “exploratory” operation?
- What is Barksdale drilling for? The PoO does not mention what resource (other than “mineralization”) Barksdale is hoping to exploit. However, a web search on Barksdale indicates that they are looking for copper.
- Where will the manpower for these operations come from?
- Is Barksdale going to use local workers or bring in out-of-state workers with no inherent stake in the outcome of their exploration activities (other than a paycheck)?
- What is Barksdale’s ultimate goal for the drilling (open pit mine, underground mine, selling the mine claims to South 32)? All that is mentioned in the PoO is “future mining operations.”
- How will the proposed drilling impact other recreational uses of the land, specifically hunting, hiking, birding, camping and recreational vehicle use? The disruption from this project alone may not be significant, but in combination with South 32’s mining operation, the Sunnyside exploratory drilling project (also funded by Barksdale), and several other potential mining operations, the “Land of Many Uses” will become a land of one use – industrial mine development.
- The PoO (Page 4) clearly states that Barksdale will “avoid grading, blading, and clearing of surface vegetation...” and on Page 5 (under “Access Roads”) “No blading, grading, or road updates are being proposed.” However, Exhibit 2 of the PoO (Mining Claims Area Map) shows that approximately one mile of new road **IS** being proposed! Which statement is to be believed?
- Appendix D of the PoO (Stormwater Pollution Prevention Plan) talks about “Arizona Standard” as the responsible party (page D-5, D-6 and D-9). Who is Arizona Standard, what is their relationship to IC Exploration and Barksdale Resources, and why are they responsible? This is clearly a boiler-plate plan, included with no apparent regard to the conditions that actually exist at the site, and someone at Barksdale didn’t do a very good job of cutting and pasting.
- Who should we contact at FS if we have concerns that the permittee is not complying with conditions of the permit?

Water:

- The PoO does not adequately address water issues. Has any sort of hydrogeological assessment been conducted?
- There is a limited amount of data on the geology and hydrology of the southern Patagonia Mountains. The PoO states that if water is hit during drilling, the hole will be capped. What will occur if, while drilling, a

significant aquifer, submerged flooded mining shaft or the like is encountered? Could there be a significant drawdown (cone of depression) affecting existing wells and springs? Further hydrogeological studies must be conducted to ensure there is no impact to water supplies that are our lifeline.

- Who from FS will be monitoring the drilling? What assurance can residents/landowners be given that if and when water is struck during drilling, that appropriate, immediate action to cap the hole is taken? Without adequate geologic and hydrology data, how can Barksdale be so confident that, if water is struck during drilling, plugging the hole will be a simple action without any impact to aquifers, springs etc. that provide water to residents, livestock etc.

Wildlife:

- Barksdale has simply stated that impacts to wildlife (including threatened/endangered species) is “Low” or “Absent” even though Barksdale clearly states that “Surveys have not occurred.” Lacking any specific studies done to assess the wildlife in the area, how can Barksdale make this claim? Without some sort of site-specific study to document “baseline” conditions, how can the full impact of the drilling on wildlife be assessed?
- One of the residents of Duquesne, an experienced birder, has seen a Yellow-Billed Cuckoo within the area of proposed drilling. **A wildlife study and/or assessment must be conducted to determine if this endangered species is present in the area!**
- How will deer, quail, and other non-threatened/endangered species be impacted? The PoO only deals with threatened and/or endangered species, but the FS cannot ignore other species that will be impacted by these operations and the people who will no longer be able to enjoy the National Forest for their chosen recreational activities.
- One of the landowners is in possession of a wildlife/impact summary conducted by Honeywell Corporation for Homeland Security to assess the impact of placing cameras along the southern portion of their parcel. At the very least, this document should be reviewed to determine its relevance to the proposed drilling.

Traffic/Noise/Visual Impact:

- How much dust will be generated by the increased traffic on Duquesne Road?
- How will the increased traffic on Duquesne Road (which is only one lane wide in most locations) impact the ranchers, residents, and recreational users of the road? The two primary routes in and out of the area of

proposed drilling are Duquesne Road and Harshaw Road. The increased traffic from this proposed drilling coupled with the already increased use of Harshaw Road by South 32's mining operations will impact residential and recreational use of these roads.

- How will the increased traffic on local roads impact Border Patrol (BP) operations? The BP uses all the roads all the time and is frequently driving at high speed in pursuit of undocumented border crossers.
- How will the increased traffic impact the physical condition of the roads? The road listed in the PoO as Barksdale's primary ingress and egress route (Duquesne Road) is not designed for frequent or heavy vehicle use.
- What measures will FS require of the permittee to inform BP, residents, the County (Public Works/Road Supervisor) at a minimum regarding use of roads, closures, dust control, etc.
- We recommend that IC Exploration, LLC be required to take an inventory/audit of existing conditions of County Roads and work with the County to ensure any damage is repaired and roads are maintained to current standard during the duration of the project.
- How will the FS address the noise associated with this operation? Many residents in the area will see and hear the equipment using Duquesne Road, and will see and hear the drill rig.
- The section of the PoO dealing with scenic values (Section V(D)) is seriously flawed. No mention is made of the residents in the area that will clearly see the drilling operation. IC Exploration, Barksdale, American Standard (pick one) has obviously not even considered the visual impact to the people who live in the area.

Monitoring/Compliance:

- How will the FS monitor and enforce what Barksdale says they're going to do? What are the penalties for non-compliance?
- Monitoring of drilling mentioned above.
- The FS roads that would access drilling pads are narrow, rocky and steep in places, and cross a seasonal creek. How will FS ensure that the contractor will only undertake minimal cutting, road leveling etc. so as not to damage the environment and potential wildlife habitat.
- Drilling outside daytime hours. How will FS ensure no lights are used?
- Noise carries miles in this area. What monitoring will occur to ensure residents in the immediate vicinity are not impacted?

In conclusion, IC Exploration most surely hopes to get the green light to expand, and we have all seen the devastating, largely irreversible impacts of large mining operations. Nothing leads us to believe that this operation would be any different. Nothing leads us to believe that IC Exploration is serious about

minimizing the impacts on our public lands, our environment, our wildlife or nearby landowners. We must be not be complacent, misled or deceived.

We speak not only as nearby landowners but for the people of this country who want public lands to be preserved for their original purpose, available to all citizens for their enjoyment and appreciation, now and for the generations to come. We support the Forest Service, as stewards of our public lands and as our representatives, in their mission to conserve and protect.

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