

FROM
Jerry & Margaret Nelson

EMAIL: [REDACTED]
EMAIL: [REDACTED]

March 6, 2023

USDA-Forest Service
BH National Forest
Hell Canyon Ranger District
1019 N 5th St
Custer SD 57730

SUBJECT: COMMENTS ON PROPOSED EXPLORATORY DRILLING PROJECT F3 GOLD
NEWARK EXPLORATION DRILLING PROJECT.

COMMENT:

We are Margaret & Jerry Nelson. We live at [REDACTED]
[REDACTED] D. We are 4th generation property owners of homesteaded
land that lies directly in the boundaries of the Newark Exploratory Drilling Project.
There are 10 of the 39 proposed multi-directional drill holes within a ¼ mile of our
property. All of this proposed exploration is very upsetting to us on many levels.

A first concern is the lack of any environmental studies prior to drilling. For
example, baseline water quality studies are imperative prior to the drilling. A
categorical exclusion is NOT appropriate for this project. We need an
Environmental Impact Statement (EIS) as has been done for other recent gold
exploration projects in the Black Hills.

Several drill sites are in the headwaters of the French Creek Drainage. These trickle-
down granite fractures collect water that end up in springs that feed into French
Creek, which in turn feeds into the Minnekahta, Minnelusa, Madison and other
formations that become major aquifers. Many towns on the perimeter of the Black
Hills depend on these aquifers for their water source. And most importantly, the
city Custer and many private wells depend on the French Creek Drainage.

Exploratory drilling and any future mining operation needs a source of water. (And
yes, you must plan for future mining because why even drill these holes unless you
want to have a gold mine?) You don't open Pandora's Box without planning for the
consequences. Where will this water be sourced from? Will they rob us of our
most precious resource? We live near the confluence of French Creek and Ruby
Creek. For the past 2 summers, Ruby Creek has been dry and French Creek nearly
dry. There is a limited amount of water in this watershed. Water is life and more
valuable than any amount of gold.

You must also consider the risks associated with plugging multi-directional drill holes that reach 500-3000 feet deep. Any contaminants entering the drill hole eventually can trickle down to the surrounding private wells, the Custer City wells and ultimately the aquifers. If the 'mysterious' source water that F3 Gold uses for drilling gets contaminated...the wells and aquifer will too. If the plugging process fails, the wells and aquifer can become contaminated too.

If you have no baseline study, no EIS...how do you determine who is responsible for polluting the water? Or drying up the watershed? What exactly is the process for plugging these multi-directional drilling holes? Who monitors the process? What recourse do we have if our wells go bad? Some of the problems might take years to show up...how will the water be monitored?

Mining reclamation is costly. It can bankrupt the mining company. And then it is up to us, the citizens, the State to pay the bills. Just look at the Gilt Edge Mine in the Northern Hills and the millions of dollars the Federal Government and the State of SD has spent there. And looking to a future with a possible gold mine operation, you must add cyanide leach pads to the risk equation. How deep are the pockets of F3 Gold or the foreign or US based company they sell too?

This project is literally in our backyard and we have other concerns that must be addressed prior to any drilling authorization. These include Air Pollution, Dust Control, Noise and Light Pollution (and its effects on wildlife and humans) and Forest Fire Risk.

1. AIR POLLUTION/DUST CONTROL regarding drilling traffic on Upper French Creek Road (County 286). It should be stipulated that F3 Gold pays for the application of mag water for dust mitigation. Require an air quality test in EIS prior to drilling.

2. NOISE & LIGHT POLLUTION. Absolutely do NOT allow 24 hour nonstop drilling. Mandate that drilling work is for 12 hours per day. Drill from 6am to 6pm. Shut down operation from 6pm to 6am. No drilling. No lights. Require EIS to assess harmful effects of 24 hour noise and light on wild life and humans prior to authorization. We love living in the country for its peace and quiet and the night sky. If drilling is 24 hours a day....7 days a week.....for 52 weeks. We will be sleep deprived and at risk of losing our sanity.

3. FOREST FIRE RISK. Our dry seasons make this area a tinderbox. It just takes one spark to have catastrophic results. Mandate fire fighting equipment and sprayers at all sites.

In conclusion, we are strongly against the outdated 1872 Mining Laws that allow this travesty. Is gold worth destroying the heart and soul of our beautiful Black

Hills? NO! With gold we gain a fleeting monetary gain for an elitist group....but we lose everything that really matters for eternity. 80% of gold production is for jewelry. It takes 20 tons of ore for one gold ring. So someone gets a piece of jewelry and we get 20 tons of mine waste including arsenic, uranium, vanadium and cyanide leach pads. It is foremost a vanity mineral. The other 20% of gold production goes to coins, bars, electronics and medicines. People argue that mining creates jobs and is good for the economy. We say the revenue from gold pales in comparison to the revenue gain from people seeking to live here, to travel here, to retire here. They come for the intrinsic beauty of the Black Hills.....not for an open pit. Let them go to Lead, SD to see that.

Our family has roots in Custer since 1887. Our children and grandchildren love to come to Custer and the 'ranch'. No one wants the destruction of this sacred beautiful place we call 'Home". DO NOT FAST TRACK THIS PROJECT!

ADDENUM FROM JERRY AND MARGARET NELSON

March 6, 2023

SUBJECT: ADDITIONAL COMMENTS ON NEWARK EXPLORATION DRILLING PROJECT

ADDITIONAL COMMENTS:

1. We are opposed to mining of ANY minerals in our Black Hills (gold, lithium, uranium)and any other ore sourced for these elements/minerals.
2. We do not see how you can use Section 8 as a Categorical Exclusion (CE) under NEPA per 36 CFR 220.6 (e) (8).

It clearly states "CONSTRUCTION OF LESS THAN 1 MILE OF LOW STANDARD ROAD"

Your scoping letter states "An estimated ~5,500 linear feet of temporary new access alignment for drill site access are proposed"

Also stated under Section 8 (vii) it states " Approving a plan for exploration which authorizes repair of an existing road and **THE CONSTRUCTION OF 1/3 MILE OF TEMPORARY ROAD**; clearing vegetation **FROM AN ACRE OF LAND** for trenches drill pads, or support facilities.

Your estimated acreage is 4.49 acres . This exceeds one acre requirement. (Drill pads 2.24 acres, Laydowns 0.75 acres, New temporary access alignments 1.5acres (roads)

Your new road exceeds both the 1 mile and the 1/3 mile requirement.

3. Categorical Exclusion List states the USFS can develop CE's for categories of agency actions that they have found DO NOT HAVE A SIGNIFICANT IMPACT ON THE ENVIRONMENT. How can you determine this ? We strongly feel the impact on the environment is very significant.

4. Categorical Exclusions (c) Scoping

This states " **if the responsible official** determines, based on scoping , that it is uncertain whether the proposed action may have a significant effect on the environment, prepare EA. If the **responsible official** determines, based on scoping that the **proposed action may have a significant environmental effect, prepare an EIS.**

Who is the 'responsible person?'

5. We feel F3 Gold is under estimating the size of the drill pads and the time frame for such a project. They are trying to meet the criteria for a categorical exclusion and once their foot is in the door, who stops them if the acreage is larger? The time frame expands?

The USFS needs to protect the environment . These F3 Gold figures are not feasible. Why rush this? Do an Environmental Impact Statement.