

Data Submitted (UTC 11): 10/18/2020 6:43:26 PM

First name: Jeff and Eleanor

Last name: Lockwood

Organization:

Title:

Comments: Re: San Antonio Exploration Drilling Project #58629

Dear Mr. Goshen

We are full-time residents of Duquesne in the Patagonia Mountains. We bought two of the old buildings associated with the Bonanza mine in 2009 and have renovated both buildings. Subsequently we have bought two adjoining parcels of land from which we can clearly see some of the proposed drill sites for the aforementioned project. Our property lies within one-mile of the proposed project. We are avid hikers and use both FR61 and FR58/49 regularly, not only for access to the numerous forest roads around us that provide outstanding hiking/wildlife viewing opportunities, but also for driving to both Nogales, Patagonia and beyond, for essential shopping, participating in community events, doctor's appointments etc.

Operations from the existing mining operations in the area have already directly impacted us. Increased traffic, movement of heavy equipment and in particular, road improvements with no advanced notice of construction schedules, have not only significantly delayed travel, but for a period of 5 weeks, forced us to use FR61 and SR 82 to ensure we arrived in Patagonia on time for scheduled events and appointments. Traffic impacts and other impacts to the human and natural environment from this proposed project warrant, at a minimum, current in depth studies to accurately assess the impact of this project. We are requesting that the Forest Service (FS) conduct an Environmental Assessment to consider not only the impacts of this proposed project but also the cumulative impacts of the multiple mining projects in the Patagonia Mountains.

Other specific concerns related to the San Antonio Exploration Drilling Project are:

Public safety:

1.Traffic: The San Antonio Plan of Operations paints a picture of a small, drilling operation being conducted in the middle of nowhere with an occasional traveler utilizing the roads. Use of access roads to the project site apparently are used by the occasional visitor or rancher; no mention is made of the numerous full-time and part-time residents in the immediate vicinity who use both the access roads and other roads every day. Also absent is reference to the numerous hunters, recreationists, campers, tourists whose numbers are significant on many holiday weekends, who also use FR61 and FR49. The Border Patrol (BP) is very present in this area on all roads and they frequently drive at high speed in pursuit of illegal migrants.

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.

\*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 duration of permit.

\*Consult with Arizona Game and Fish to ensure hunters with licenses have access to their hunting areas

2.Fire: the Plan of Operations (PoO) outlines an inadequate plan of preparedness in the event of a wildfire. The proposed site is surrounded by hundreds of acres of trees and shrubs that received less than half the normal rainfall in the monsoon of 2020. Currently FS has imposed maximum fires restrictions in this area.

We request that, at a minimum, the following should be required:

\*FS should pursue a Risk Management assessment to outline every precaution required to assure the safety of the local residents.

\*IC Exploration must provide to all residents a description of how they will notify all residents if a fire starts and coordinate with residents in the event of an evacuation.

\*IC Exploration must have a water truck equipped to fight a forest fire on site for the duration of the project.

\*A certified wildland firefighter must be present on site for the duration of the project

\*IC Exploration shall post a Bond or have insurance coverage to pay for any damages resulting from a fire that starts at the project site.

\*Prior to project start, IC Exploration must coordinate with the Patagonia Volunteer Fire Department re fire-fighting plan and protocol. (Note: when a fire starts in this area the Patagonia VFD is often first to arrive.)

Water:

1. 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.

2. 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 geology and hydrology data, how can Barksdale/Arizona Standard/ IC Exploration 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.

Endangered species/ wildlife:

Old data has been referenced in the PoO and yet reference is made to surveys conducted in Spring 2020? Why has the recent data been omitted? What coordination has occurred between the FS and/or IC

Exploration/Arizona Standard/Barksdale and Arizona Game and Fish Dept (AGF) to ensure the most current data, where available, has been reviewed and included in the PoO?

We request that FS coordinate with experts at AGF to ensure data from the most recent studies on all threatened and endangered species is included in the PoO and, where data is more than 10 years old (or less depending on AGF expert advice), recommendations from AGF regarding surveys that should be conducted prior to any drilling commencing, must be required.

The absence of recent, in depth surveys should require, at a minimum, an Environmental Assessment for the proposed exploratory drilling project.

General concerns:

1. The FS roads to access drilling pads are narrow, rocky and steep in places, and cross a seasonal creek. The PoO states that there will be minimal ground disturbance and minimal vegetation removed. Has the applicant or FS visited and travelled the proposed "legacy/two track roads"?

Having recently hiked and driven (using 4Wheel Drive) the proposed routes, it brings to question the accuracy of the PoO. How will FS ensure that the contractor will only undertake minimal cutting, road levelling etc so as not to damage the environment and potential wildlife habitat?

2. Drilling outside daytime hours. How will FS ensure no lights are used? We enjoy the dark skies in this area. Will FS conduct unannounced visits to the site to ensure the contractor abides by the conditions of the permit? The PoO inaccurately reflects the presence of residents in the vicinity of the project that will not only see some of the drilling rigs but will be impacted by lights used on the project site. Appropriate screening of drilling rigs to minimize visual impact to residents must be required.

3. Noise carries miles in this area. What monitoring will occur to ensure residents in the immediate vicinity are not impacted? Who is ultimately responsible for the activities being proposed? Several residents received a letter from Barksdale Resources but they are omitted from the PoO? If residents have concerns regarding the contractor who should we call?

As stated earlier, the applicant has gone to great lengths to paint a picture that the proposed drilling operations are minimal, with minimal disturbance to the environment, wildlife, landscape and "infrequent visitors". The PoO does not reflect the existing environment, landscape and the presence of numerous residents and users of this unique environment. We request that, at a minimum, an Environmental Assessment be conducted to ensure FS has current and accurate data upon which to base their decision for the proposed project.

We appreciate the opportunity to comment on this project.

Sincerely,

Jeff and Eleanor Lockwood