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Title:
Comments: I have property in Custer County that could potentially be affected by groundwater contamination based on the proposed construction activity. I respectfully request that an environmental impact statement (EIS) as set forth in the National Environmental Policy Act (NEPA) be completed in order to ensure that the public and the natural resources be protected.

I would like the following comments to be incorporated into the plan of operations report:

1.A realistic schedule as to how the drilling will take place within the 1-year time span should be submitted. The 1-year schedule should include mobilization and demobilization from the area. Based on their rigs they anticipate a 1.5-month duration per location, I think it's more like 3 months from mobilization to demobilization including restoration
2.The report should discuss the process for granting an extension, and it should be reviewed by the public once more.
3.A traffic impact study should be conducted to determine how many trips will be generated from this activity, along with their carbon footprint. (1 water truck, 1 excavator, 1 dozer, 1 skid steer for 4 rigs running simultaneously it is not logistically feasible, this count should double or triple at the minimum) I would estimate 8-10 drill operations going on simultaneously, in order to achieve their schedule.
4.Section D Equipment vehicles should be updated to show the true size of the outfit to meet the schedule.
5.Show how the drilling spoils will be staged and where they plan to dispose of the drilling mud, this should be added to the impact area. Cutting tanks will be provided, however what happens to the wastes from then. A clear path from insitu to reclamation should be shown. The report states that it will be spread throughout the site and covered with topsoil and reseeded. Will these millings be tested for contamination before the reclamation takes place and if so, how often?
6.How will the borings be abandoned; they will be a potential source for groundwater contamination in the future if not properly abandoned. A plan for abandonment should be provided and reviewed.
7.How will 1 water truck provide support for all the rigs, and maintain dust control, update table D accordingly. 1 water truck is 4,000 gallons unless a large 10,000 gallons water wagon is used which would not be traffic rated and would destroy the roads. The report states a rig needs 4k to 10k per day per rig.
8.The Air quality section needs to be looked at more closely, there is a definite impact based on all that diesel that will be expelled during construction activities. This section response is anecdotal with no backing to sustain their claim. A traffic impact report would show the true impact based on their anticipated trips in and out of the area.
9.Under water quality item 2 erosion control measures it states, "There are no waste or tailings dumps proposed as part of this Plan of Operations." yet is states earlier that they will be spread throughout the site and reclaimed, what are we really doing with the tailings
10.The report states that borings will be closed, yet from each set up multiple borings will be conducted, will each bore be closed and sealed before they move to the next boring. Need an abandonment plan besides a 1 sentence response.
11.Water quality Item 5, states no wastewater disposals. However, tailings will be dried in the cuttings tank and then reclaimed. If they are stockpiled and not properly protected during rain events runoff will be generated that could cause sediment issues.