

Data Submitted (UTC 11): 3/14/2023 5:31:58 PM

First name: THOMAS

Last name: O&#39;CONNOR

Organization:

Title:

Comments: This letter is in addition to my previous comments.

This proposed project should be prohibited. Have interested Native Americans been involved and consulted in this process? What about the Fort Laramie Treaty of 1868 with the Lakota?

If allowed, a full Environmental Impact Statement must be prepared. Here are some reasons:

The application is full of generalized statements and vague assurances .

The map prepared by F3 (map1) does not correctly identify the claim boundaries and private landholdings near the proposed project.

It seems unlikely this project can be completed in one year. Drilling, especially 24/7 will disturb the scenic and peaceful qualities of the forest.

The French Creek watershed provides recharge to the local aquifer which supplies drinking water to over 2,000 people, including the City of Custer. Dozens of drinking water wells are located adjacent or downstream of the proposed project. The proposed project will drill directly into this aquifer. No consideration has been given to how this proposed project may affect the aquifer and local drinking supplies.

It appears F3 is proposing over 5,000 feet of new access trails or roads within the national forest.

The F3 proposal says all drill pads and laydowns areas are to be located away from 'potentially sensitive areas". What are these sensitive areas and how were they identified? Where are they located? No map or study has been provided.

F3 states that all sites have been assessed for 'potential surface impact' to wetlands, streams, creeks and open water. How did they assess this? No map of these areas has been provided. Has a topographic survey been completed to identify these areas? What studies has F3 completed to identify these potential surface impacts?

F3 states that the drill sites have been selected to minimize the social and environmental impacts of the proposed project. What are these social and environmental impacts? It is impossible to evaluate this statement with out further information on the types of impacts that were assessed.

F3 states that as much as possible, the proposed project will avoid utilization of roads that are heavily travelled by the public to" minimize the overall impact to the public". What do they mean by 'heavily traveled'? There will be all sorts of new truck traffic on Hwy 16, including probably through the City of Custer. How much traffic will be on French Creek Road? Was any type of traffic study completed to determined the volume of traffic, the amount of traffic disturbance and the resulting impact to the public? Is there a traffic control plan?

F3 states their proposal will allow "flexibility to limit the removal of trees or other environmental or social impacts"... What are the environmental and social impacts they are trying to limit? These need to identified and quantified.

F3 states their proposal favors "areas of prior surface impacts"... There is no map of these areas of prior disturbance and no map that shows how the proposed disturbances overlie or match up with these areas if at all.

F3 states all proposed sites have a 100 foot buffer to known intermittent streams and water bodies where possible. Why is there no map or study that shows where these streams or water bodies are located? This proposed project if allowed will disturb over 2 acres. Has a storm water prevention plan been submitted?

F3 states that careful consideration of topography and slope has been assessed for all proposed drill locations. Was any topographic survey completed? No topographic map has been submitted. Topographic surveys are generally completed at 1 ft intervals.

F3 states the proposal takes precautions to limit disturbance to scenic value. What are the potential disturbances? What specific actions does F3 propose?

F3 states there are no known threatened or endangered species affected by their proposal. Has a biological study been completed? There are certainly threatened and endangered species in the Black Hills. How do they know that none are located along French Creek or in the area of the proposed project? What about noise and lights?

F3 states the proposed project will not interfere or impact with known historical or cultural sites. Has any study been completed to locate or identify these sites? Have interested Native Americans been contacted to help identify cultural sites?

F3 states that they will strive to minimize surface impacts. Has a separate plan been submitted that identifies how this will be achieved? For example what exactly are the "low-impact" methodologies to be employed. Has a separate written "plan of communication " been submitted?

F3 states they will plug the drill holes in accordance with ARSD 74:11:08. This regulations allows for a great deal of variance. Has F3 submitted a specific plan for drill hole abandonment? Will downhole geophysics be employed to identify the flow and quantity of the groundwater so that each groundwater production zone is adequately sealed? This is a drinking water aquifer and extra precautions must be taken.

F3 states that refueling and lubrication of the drill rig and its components will occur as needed. How exactly will this be completed? The drilling will go into a drinking water aquifer and extra precautions must be taken to protect water quality. Has a plan been submitted for the decontamination of all downhole drilling equipment before and during drilling at each site? Has a spill prevention plan been submitted for the refueling in the national forest over a drinking water aquifer?

Will there be on-site testing of the water before being used in or recycled through a drinking water aquifer?

The proposed plan fails to identify potential social, environmental and cultural impacts and fails to explain what activities will be used to minimize the impacts to each. The plan fails to identify the impacts of the proposed project have on neighbors, small businesses and the neighbors?

Overall this proposed plan contains vague assurance and generalizations that the social and environmental impacts will be minimal but offers very few specifics on how this will be accomplished.

