Data Submitted (UTC 11): 2/21/2023 7:00:00 AM
First name: Daniel
Last name: Zackey
Organization:
Title:
Comments: Subject: Newark Exploration Drilling ProjectI live in the Custer area and spend a great deal of time in the Black Hills National Forest:, hiking, running, riding, UTVing, and camping, and I oppose the proposed Newark Exploration Drilling Project. The Forest Service decision to evaluate this project as a Categorical Exclusion under the National Environmental Policy Act is not appropriate for this project. At a minimum, an Environmental Assessment should be done. Furthermore, the Plan of Operations submitted by F3 Gold is incomplete and grossly underestimates the environmental and social impacts of the drilling operations. I also have many questions and concerns related to the project and I think the company owes it to the public to answer all of them in a satisfactory manner.If F3 Gold's proposed drilling project is just to "test F3 Gold's scientific theories" why are they boring holes into 39 drill sites in the most heavily populated area in the Southern Black Hills? It seems more likely that the company will be actively searching for gold and if any is found there will be further operations - either F3 Gold will subsequently begin the process for mining operations, or they will sell the claim to a mining company. So we are potentially looking at 39 gold mining operations within a few square miles and adjacent to the most heavily populated area in the Southern Hills. In addition, the proposed drilling and potential future mining operations are occurring in an area with a large elk population, a species that is very sensitive to human activity.The Plan of Operations is misleading and grossly underestimates the total anticipated surface impact. The estimated acreage only accounts for one drill pad. Total Program Impact from 39 drill pads, 3 staging areas, and new access roads will not be 4.49 acres. It will be some 200 acres. This is a very large area requiring substantial reclamation efforts at the end of the project since each drill pad area will require significant clearing in order to accommodate the substantial amount of equipment crowded around every boring site: the drilling rig, water tanks, fuel storage tanks, human shelters, lights, security fencing, upwards of 6-8 pick-up trucks, 4 UTVs, an excavator, dozer, skid steer and the trailers to transport them, the 10,000 gallon water truck, and all the associated equipment (pumps, water lines, drill rods, port-a-johns, etc). The company will have a huge reclamation requirement on their hands when the project is finished and it is not acceptable to allow the company to police itself. There should be some sort of external oversight to ensure the 200 destroyed acres are restored to something resembling their natural state.The Plan of Operations does not list all the equipment and structures that will be used for the project. It does not mention the large trailers needed to transport the excavator, dozer, skid steer, and snowmobiles. It does not mention human shelters, and since the company plans to conduct 24 hour operations, it is reasonable to assume that some sort of shelter at each drill pad will be erected to protect the employees from cold and weather. It does not mention lighting (for night operations), or security fencing (since some of the drill sites are next to forest service roads which are used by the public).The Plan of Operations states up to 10,000 gallons of water a day will have to be trucked to each drilling rig. The Plan also says up to four drilling rigs will be in operation at any time. Where will the company get upwards of 40,000 gallons of water every day? This water requirement indicates there will be daily, if not constant, water truck activity from the drilling sites. Water is a scarce resource in the Black Hills. Since the city of Custer institutes water restrictions every summer, I assume Custer cannot be the source of municipal water. The Plan also states that pick-up trucks will transport fuel to the drilling rigs. How much fuel will be used per day, and how many trips will the pick-ups make per day from gas stations to the drilling rigs? How large will the fuel storage tanks at the drilling sites be? My concern in this area is spillage from hazardous materials, and the wear and tear on Wabash Spring Road, Upper French Creek Road, and the forest service trails in the forest from this nearly continuous heavy truck traffic, 24 hours a day. Creation of dust from the heavy traffic is also a concern during our dry summer. Will the company be liable for damage to the roads or otherwise re-grade and re-gravel them after a year of heavy use?The drilling operations will have substantial impacts on the wildlife in the area, as well as substantial social impacts. The Plan of Operations indicates the company expects to operate through all four seasons. Have they been waived from the winter exclusion period, which I understand is for wildlife protection? The public is not allowed to travel the forest service roads in motorized vehicles from mid-December to mid-May, and the gates to the roads are closed. Does this rule not apply to F3 Gold? Will they be allowed to travel the

roads with their heavy equipment during the winter and spring? If so, it will be detrimental to the wildlife population. There are housing areas all around the proposed drilling sites. The noise, lights, and dust from the drilling will negatively impact everyone who lives there. Truck traffic from the drilling operations will also impede the residents who drive on Wabash Spring and Upper French Creek to access their properties, not to mention impede, and possibly pose a danger, to all recreational activity in the area. I know from personal experience that both Wabash Spring and Upper French Creek Road have hikers, runners, bicyclists, UTV s, and hunters on the roads and people camp along Wabash Spring Road. Many of the proposed drilling sites are right next to Wabash Spring Road; will the public be denied access to Wabash Spring Road during drilling operations? Finally, the Plan states the contractors will avoid heavily travelled roads to access drilling operations. However, it also says they will use Highway 16 to access Wabash Spring and Upper French Creek, so their plan is impossible. Highway 16 is the only paved road on the north and west sides of Custer, and so it is the only paved road available to the public, and is especially busy during the tourist season.The Plan of Operations states each drill site will have multiple holes bored in both the vertical and angled directions. There are known waterways, above and below ground, and aquifers in the area on which local residents depend for their well water, for both residences and domestic stock. How can the company guarantee they won't hit and damage or contaminate a water source? If contamination occurs, it will not limit itself to the immediate area of the drilling operations. Not only will local residences be negatively affected, but damage to French Creek will impact the city of Custer and Custer State Park, not to mention the fish, other aquatic life, waterfowl, and other bird species (such as bald eagles, osprey, and herons) who live in or are dependent on the creek, since the waterway flows eastward through Custer and the Park toward the Badlands. Contamination of aquifers and waterways would not only negatively impact local wildlife and residents, but also our tourism and outdoor recreation economy. It is not acceptable to allow the company to police itself. If there is no outside oversight, they will not do their due diligence, and cannot be held accountable after the project.Associated questions: how many contractors will be working each 12 hour shift? What kind of shelter will be erected for the workers? Will operations continue throughout the weekend and during holidays? What kind of lighting will be installed? How big is the drilling rig? (It seems boring holes up to 3,000 feet deep would require an enormous tracked vehicle.) How loud is the drilling rig? Will this gold mining lead to lithium mining and all of its MANY environment impacts?I would not be surprised if F3 Gold wants to keep exploring after the Newark Exploration Drilling Project is complete. This is likely only the beginning of a wide-scale effort to mine gold in the Black Hills. All potential future drilling should be described and assessed now, before this project is considered, and the potential for large-scale gold mining should also be openly acknowledged and more fully explained and described. I believe I share the concerns of my fellow Custer residents. We do not want to see this beautiful natural environment destroyed by commercial interests focused only on stripping the land, contaminating the water sources, and disturbing the wildlife to extract gold.Along with the above concerns, the Native American Tribes were not consulted and this exploration is a desecration to their sacred lands, burial sites, land blessing ceremonies and so much more. They are a sovereign nation and were not brought in on this at the start. It is my understanding that there is a lawsuit being brought out in this regards and should be respected.