

South Dakota Division



The Izaak Walton League of America

Defenders of Soil, Air, Woods, Waters, and Wildlife

April 7, 2023

Re: Newark Exploration Drilling Project

U.S. Forest Service
Rob Hoelscher, District Ranger
1019 North 5th Street
Custer, SD 57730

Dear Mr. Hoelscher,

The South Dakota Division of the Izaak Walton League of America (Division) appreciates this opportunity to provide scoping comments on the Newark Exploration Drilling Project. F3 Gold, LLC of Minneapolis, is proposing to conduct exploratory drilling west of Custer. The League has over 42,000 members in more than 200 chapters and the Division has over 1,500 members in 12 chapters. Our members hunt, fish, camp, and enjoy time in the Black Hills National Forest.

The Division understands the submitted proposed Plan of Operation has been amended and could be changed again following the environmental review. The project proposes to drill 3–4-inch holes 500 to 3,000 feet deep at up to 39 sites. The exploration would require an estimated 5,500 linear feet of 12-foot-wide access routes and clearing of the drill pad sites.

Three staging areas to store equipment and tools are included in the plan. The exploration would continue with no seasonal closure. In the event of a shutdown of operations, the sites and staging areas will be stabilized to try to minimize impacts to water quality.

The proposed project would disturb about five acres of National Forest System land. The Plan of Operation states 5,000 to 10,000 gallons of water used each day would be obtained from an approved municipal or industrial source. No water will come from local surface waters. The used water would be re-circulated and captured into holding tanks at the drill site for reuse.

Drill cuttings will be captured in tanks, no waste or tailings dumps are part of this plan. The plan states upon completion of each drill hole, the cuttings and fines would be dispersed in the disturbed area with topsoil placed on the cuttings for reclamation including reseeding and planting.

Erosion control measures will be done as directed by the USFS, and the State. All drill holes will be capped, grouted/cemented, and plugged (per ARSD 74:11:08 regulations) following the completion of each drill hole in accordance with State regulations.

Following completion of the exploration, the plan states all the drill pads and staging areas will be reclaimed and reseeded to pre-existing conditions as directed by the USFS and the District Conservationist. All signage will be removed and stockpiled materials will be either spread over

the pad clearing area, stacked in soil-free piles, or removed and disposed of offsite.

The South Dakota Division has serious concerns about the proposed plan. If it proceeds, we respectfully request the following be considered in the scoping process.

Water quality

The plan states the water used would be re-circulated and captured into holding tanks at the drill site for reuse.

- What happens to the used water when, and if, exploration is completed?
- How will that used water be properly disposed of?
- Where and how will that occur?

Runoff

The plan claims the pads will not significantly impact surface water runoff from average rainfall or other normal weather events.

- What are the plans for above average rainfall events that can occur in the Black Hills?

Recreation

The Division is genuinely concerned that the proposed exploration activities could drive wildlife from their habitat and impact recreational opportunities.

- Will hunting, fishing, and other recreation be allowed in the area during exploration?
- What impact will the exploration have on wildlife, especially ungulates and wild turkeys?
- How will the impacts of the exploration on wildlife and recreation be mitigated?

Cultural resources

F3 plans to coordinate with the USFS and the State to ensure proper buffers or avoidance of cultural resources areas.

- We did not see where any Tribal consultation on this proposed project has been done.
- We strongly urge Tribal consultation be conducted before the project can proceed.

Reclamation

All drill pads and staging areas will be reclaimed following completion to include spreading of stockpiled materials.

- Will those materials be evaluated for contaminants, including heavy metals, before they are spread on the drill sites?
- What is the criteria for materials to be removed and disposed of offsite?
- Who determines if removal of the material is needed?

Temporary overland routes

The plan states the temporary routes would be obliterated and returned to natural conditions after project completion.

- Is there a monitoring plan for the road sites, if so, how long will these sites be monitored?

- Is there an adaptive management plan that requires additional reclamation efforts if these sites are not meeting recovery expectations?
- What happens to the useable timber/trees removed for road and drill pad access?
- If harvested, who collects the money?
- Who is building the roads and drill pad sites?

Project timeline

The Plan of Operations states the exploration will be done in a year.

- What happens if the company doesn't complete the exploration in a year?
- There is nothing in the Plan of Operation related to a possible longer time limit.

Summary

The pristine nature and splendor of the Black Hills requires that if this proposed project proceeds, it's done with the utmost caution and diligence. The area's highly valued natural resources, fish and wildlife, scenic beauty, and the recreation and tourism economy, all depend on it.

With the factors listed in this letter, the Division requests a full Environmental Impact Statement be conducted on this proposed project before it can proceed.

The South Dakota Division of the Izaak Walton League of America thanks you for this opportunity to comment on Newark Exploration Drilling Project. We ask to be kept informed on all future developments including comment periods, meetings, and public hearings.

Thank you for your time and consideration.

Sincerely,



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