

Petition to Intervene on Wharf Resource's Boston Mine Permit Expansion Project

CT Corporation
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MINERALS & MINING PROGRAM

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I am submitting this petition to intervene in the State Recommendation to approve the Wharf Resource's Boston Mine Permit Expansion Project.

My interest in becoming an Intervener is because;

The area being mined is in unceded Treaty Territory under the 1868 Ft. Laramie Treaty. There must be meaningful Government-to-Government Tribal Consultation and Cultural Surveys must be completed. Cultural sites must be taken into account in this impact area - under the United Nations Declaration on the Rights of Indigenous Peoples - the free, prior, and informed consent of the area's indigenous peoples before any mining was approved.

Next, based on data collection using the DANR interactive "Tanks, Spills, and Environmental Events" interactive map focusing on the Northern Black Hills I found incomplete Cyanide and other toxic mining fluids "Spill" reports to the State that go back to 1983. Therefore, I believe that based on the numerous incomplete spill reports, rather large or small, this project should not move forward until those reports that are missing important information are updated in the State DATABASE. This will give County and State citizens truthful information and provide transparency.

From 1983-2023 Wharf/Coeur Mining, including the Golden Reward Mine, filed 216 "Accident" reports with the State. In general, that would be 5.4 "accidental" Toxic Spills per year. The total AMOUNT of these reports comes out to be 125,333, but that number is not an accurate account as nine or more of these "Spill" reports filed with the State are void of AMOUNT and/or UNIT. So it is hard

to say what it was; Gallons, Tons, Cubit Yards, etc. Also, since some of the AMOUNT fields are NULL, this also gives an inaccurate number.

I have looked at some of the PDFs (when available on the State Spills map) to find more information and saw a few of the **reporting forms** where the boxes; Gallons, Cubic Yards, Tons, etc and/or Amount of what, were not reported. Now, since some of this data is void of important information it is hard to say how much was spilt; whether it was gallons, cubic yards, tons, or barrels. There are numerous reports with the AMOUNT and UNIT data fields left blank or NULL. However, for those reports, in the MATERIALS field, it lists either Pond Water, Cyanide Solution, Solution 0.8 ppm CN, WAD Cyanide solution, Mine tailing, and so on.

Next, it is documented that water contamination has happened in Fantail Creek, Annie Creek, Strawberry, and other waterways. The Black Hills has unique and special ecosystems that are interconnected through caves, caverns, aquifers, watersheds, and waterways. Toxic contamination that gets into the natural water systems will travel to other areas and eventually end up in the Missouri River.

This expansion is also obliterating important wildlife habitats and preservation, the Black Hill's natural beauty, agricultural benefits, recreation, and the tourism industry will be NULL for that area for future generations. In 2022 tourism provided 56,000 jobs and a whopping \$7.6 BILLION.

In closing; HESAPA (Black Hills) is known my people as Wamaka Ognaka Icante - The Heart of Everything That Is. This "island" on the prairie provides us with our natural medicines, food, and healing waters, and is home to 1,000s of species of wildlife and plant nations. The HeSapa holds our creation story - our coming into being as human beings. They hold stories of our ancient traditional teachings and historical events. They hold eons of memory in our DNA and Water is our main entity – Mni Ki Wicozani; Water Gives Life. Water is Alive. Water is Sacred."

Thank You.

Carla Marshall 4/25/23

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