



**DEPARTMENT of AGRICULTURE
and NATURAL RESOURCES**

JOE FOSS BUILDING
523 E CAPITOL AVE
PIERRE SD 57501-3182
danr.sd.gov

December 8, 2022

Ken Nelson
Mine Manager
Wharf Resources (USA), Inc
10928 Wharf Rd
Lead, SD 57754

Dear Mr. Nelson,

We have completed review of additional information submitted by Wharf Resources on November 28 and December 2, 2022. Please take time to review the following comments and make the necessary corrections to your mine permit application.

Procedural Completeness Comments

1. ARSD 74:29:02:11(9): Please submit a map showing proposed erosion and sediment controls and drainage flow paths along the southwest pit perimeter and downslope from the pit in the Flossie area during mining and pit backfill on the mine plan map. To prevent Exhibit 23 from becoming too cluttered with information, please submit a new map with this data. Also, please add a narrative addressing any additional sediment or erosion controls required on this slope during mining and reclamation. Since this is a steep slope, we are concerned that blow outs and erosion rills could form.

Technical Comments

1. In Table 1-4 on page 15 of the application, the "Total Surface Mine Expansion as Reclamation Credit" should be 666.61 acres instead of 666.71 acres. Also, the "Grand Total Expansion Acres Allowable Under SDCL 45-6B-96 and 45-6B-97" should be 768.62 acres instead of 768.72 acres.
2. The technical revision requirement for slash piles was removed from the list of proposed technical revision categories. DANR would like to see that technical revision reinstated, but with better definition to apply only to slash piles located on reclaimed land or within pit backfill.

3. In the December 2, 2022, response, Wharf proposes the addition of Technical Revision 36. We find this technical revision to be mostly acceptable; however, please remove the caveat limiting its applicability to areas of more than 1 acre of disturbance. Disturbance acres are tracked to the nearest 0.01 acres making the added caveat unacceptable.
4. Based on additional waste rock noted outside the pit in F-F', please clarify whether the current Flossie Waste Dump will be expanded to the south during the proposed mine operation. If so, please show the new extent of the Flossie Waste Dump on a map. How much additional tonnage is anticipated to be placed in this facility? Also, are there any plans to use the Ruby Dump as pit backfill?
5. In the last sentence in the paragraph above Table 6-1 on replacement page 104, Wharf states that all species that appear in the revised mix are cool-season plants. Since big bluestem, which was added to the seed mix is a warm season grass, this statement is incorrect and needs to be revised to reflect the changes in the seed mix recommended by the NRCS.
6. Please address the conflict in geology presented in some of the Exhibits. For A-A', Exhibit 6 shows this as Tertiary alkali rhyolite porphyry, but Exhibit 7 shows it as Tertiary phonolite porphyry.
7. On Exhibit 2, please show the Reliance Depository which would be to the west of the Flossie Waste Dump.
8. On Exhibit 3, please show the Reliance, Ross Valley, and Cleopatra Depositories.

If you have questions on the contents of this letter, please feel free to contact Eric Holm or myself at (605) 773-4201.

Sincerely,



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