



April 20, 2015

Mr. Christopher J. Willger
Wisconsin Department of Natural Resources
1300 W. Clairemont
Eau Claire, WI 54701

Dear Mr. Willger:

The members of the Wisconsin Industrial Sand Association (WISA) – Badger Mining Corp., Fairmount Santrol, Smart Sand and U.S. Silica – appreciate and fully support the effort undertaken by the Wisconsin Department of Natural Resources (WDNR) to update the 2012 report on Silica Sand Mining in Wisconsin as part of a broader Strategic Analysis of the industrial sand industry in Wisconsin. WISA members are all participants in the WDNR Green Tier program, which demonstrates our commitment to environmental stewardship and responsible operations, and we welcome updated, science-based analysis of our industry.

Industrial sand mining has a rich history in the Badger State, and some WISA members are currently operating mines that date back to the early 1900s. The tremendous growth our industry has experienced in recent years has concerned some Wisconsin communities, and we understand that. We have found, however, that much of that concern is the result of misunderstanding and fear. We believe the Strategic Analysis can synthesize the available facts and science to help offset that misinformation and foster a more accurate understanding of a highly regulated, longtime Wisconsin industry.

We have given thoughtful review to the information the WDNR has supplied about its plans for the Strategic Analysis and compliment the Department on the thoroughness of the preliminary analysis reflected by the Draft Topics Outline dated March 12, 2015. We offer the following questions and comments in an attempt to better understand the breadth and focus of the final report:

- The Department's 2012 Strategic Analysis included a description of the purpose of that document. Will the scope and purpose of this document be identified in the introduction of the report?
- Under Section 1, "Industrial Sand Mining," it may be helpful to provide an overview of the characteristics (size, grain, etc.) of the sand produced in Wisconsin, especially as it relates to the different geologic formations in the state.
- Consider including section 1.3, "Explanation of Hydraulic Fracturing," as a subset of the discussion in section 1.2, "Current Market." Hydraulic fracturing is just one of the many processes that utilize Wisconsin sand, and the Strategic Analysis should describe all end uses if it describes any. Focusing only on hydraulic fracturing, an activity that does not occur in Wisconsin, encourages the perception that sand is only mined for use within the oil and natural gas markets.

- Section 2.1, “Air Quality” does not contain any subtopics. We understand that the WDNR plans on updating the 2012 study of air-related matters concerning sand mining with more current information. We encourage the WDNR to include the results of ambient air monitoring that has been performed by industrial sand operations pursuant to NR 415.075. It may be helpful to also provide an overview of current and recent air quality trends, as well as a broader discussion of the many source categories of that contribute particulate matter to ambient air, such as point sources, agricultural operations, fuel combustion, etc.
- Will section 2.3, “Land,” discuss land conditions during mining operations, or after reclamation activities have been completed? Forests and grasslands that may be affected by mining operations may ultimately be returned to those uses.
- The Strategic Analysis should include additional information about the interaction between mining activities and endangered species. It’s not clear if section 2.3.3. “Wildlife” under the “Land” section is intended to cover this issue. Will the “Fish and Aquatic Species” discussion in section 2.2.6 be included as a subset of the “Wildlife” discussion?
- Section 3.0, “Socioeconomic Topics” should include information about the relationship between the vitality of local economies and the health of the citizens living in those communities.
- Section 3.5, “Land Use and Zoning,” may be better addressed under the “Local Regulatory Framework” of section 4.2.
- The 2012 Strategic Analysis included a discussion of contaminated sites. This topic should be addressed to provide the public with information about the landfills, storage tanks and other properties managed and maintained by the industrial sand industry.

WISA is working hard to share facts about our industry and to continue a positive relationship with state agencies and the communities where member companies operate. Our Association is happy to participate in the dialogue the Strategic Analysis process will generate, and our members are available to provide further information and insight.

Thank you for taking the time to conduct this Strategic Analysis and for seeking the public input necessary to conduct a truly scientific, fact-based review. WISA looks forward to continuing this discussion about our industry. Please let us know if there are any questions.

Sincerely,

Rich Budinger

Rich Budinger
President