

Musick - DNR, Jason <jason.musick@state.co.us>

2015 AHR Adequacy Response

1 message

Tamme Bishop <tamme.jestover@bresnan.net>
To: "Musick - DNR, Jason" <jason.musick@state.co.us>
Cc: Basil Bear <BasilBear@bowieresources.com>

Wed, Aug 17, 2016 at 9:53 AM

Hi Jason, please see the attached response <<...>> and let me know if you have any questions. Thanks.

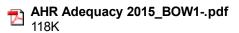
Tamme Bishop, P.E.

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MINE ENGINEERING CIVIL ENGINEERING
MINE RECLAMATION CONST. MANAGEMENT

August 17, 2016

Jason Musick
Division of Reclamation, Mining & Safety
1313 Sherman St., Room 215
Denver, CO 80203

Re: Bowie Resources, LLC, Bowie No. 1 Mine

2015 Annual Hydrology Report Review

Permit C-1981-038

Dear Mr. Musick:

DRMS' letter dated August 4, 2016 transmitted its 2015 annual hydrology report review. On behalf of Bowie Resources, LLC, (BRL), following are its responses to the DRMS' comments and concerns.

1. DRMS - Item No.9 in the table, numerous sampling sites did not include the TDS Ratio. Please provide information as to the justification for the omission of parameters not listed above.

BRL - For the TDS Ratio calculation, an email correspondence occurred with Accutest Laboratories. They do not know what the TDS Ratio is and have never heard of it. Upon inspection of Table 2 parameter requirements, TDS is not required, but the TDS ratio is. In our estimation, there should not be a TDS ratio required, only TDS. Therefore, in future AHR's, the TDS ratio will be removed only TDS will be provided.

Sampling site P1001 listed a deficiency for Temperature, Conductivity and pH. "No Inflow" has been added to the Field notes. **Please see revised Figure No. 39 for Pond 1001**.

Sampling site P1007 listed a deficiency for Total Iron and Total Manganese. These two parameters were erroneously left off of the table but have been added. **Please see revised Figure no. 47 for Pond 1007.**

2. DRMS - Item No.12 in the table, numerous sampling sites did not include the TDS Ratio. Please provide information as to the justification for the omission of parameters not listed above.

BRL - Please see discussion above in item no. 1 in regard to TDS Ratio.

Sampling site SM06 listed a deficiency for flow rate. As shown in Table 2 for wells, a flow rate is not required.

Sampling site SM07 listed a deficiency for conductivity. Conductivity was erroneously left off of the table but has been added. Please see revised Figure No.18 for SM-07.

Sincerely,

Tamme Bishop

Tamme Bishop P.E. Project Engineer

Cc: Basil Bear, Bowie Resources, LLC (electronically)

P1001 East Roatcap Creek - Pond 10-1 Depth - 5' Elevation -8520

| Initiated | 6/1/1992 | 6/1/1992 | 6/1/1992 | 6/1/1992 |
|-----------|------------|-----------|-----------|-----------|
| Activated | 2/1/1994 | 2/1/1994 | 2/1/1994 | 2/1/1994 |
| Date | 11/10/2015 | 9/11/2015 | 6/21/2015 | 4/10/2015 |

| | | | | | | 5 | | 1 17 1 07 = 0 1 0 | 07 : 17=0:0 | 0/2:/20:0 | 17 107=010 |
|--------------------------|---------------------|----------|-----|--------|--|--|--|-------------------|-------------|------------------------------|------------|
| | Summary Information | | | | | | | | | | |
| Field | | Baseline | е | | Operation | | | | | | |
| Parameters | UNITS | Min | Ave | Max | Min | Ave | Max | | | | |
| Flow | GPM | 0.2 | 0.5 | 0.8977 | 0.0 | 4.8 | 67.01 | 0 | 0 | 3.75 | 0 |
| Freeboard | Feet | 0.0 | 0.0 | 0 | 0.0 | 1.5 | 5 | 3.27 | 2.83 | 0.3125 | |
| Temperature | Celsius | | | | 0.8 | 14.3 | 28.4 | | | 16.2 | |
| Conductivity | umhos/cm | 102 | 133 | 163 | 70 | 282 | 760 | | | 180 | |
| рН | su | | | | 7.0 | 8.0 | 8.9 | | | 7.8 | |
| Field Comments | | | | | | | | No Inflow | No Inflow | No Inflow | No Inflow |
| Lab | | | | | | | | | | | |
| Parameters | UNITS | | | | | | | | | | |
| Bicarbonate | mg/L | | | | 36 | 86 | 163 | | | 82 | |
| Carbonate | mg/L | | | | <mdl< td=""><td><mdl< td=""><td><mdl< td=""><td></td><td></td><td><mdl< td=""><td></td></mdl<></td></mdl<></td></mdl<></td></mdl<> | <mdl< td=""><td><mdl< td=""><td></td><td></td><td><mdl< td=""><td></td></mdl<></td></mdl<></td></mdl<> | <mdl< td=""><td></td><td></td><td><mdl< td=""><td></td></mdl<></td></mdl<> | | | <mdl< td=""><td></td></mdl<> | |
| Chloride | mg/L | | | | <mdl< td=""><td>12</td><td>73</td><td></td><td></td><td><mdl< td=""><td></td></mdl<></td></mdl<> | 12 | 73 | | | <mdl< td=""><td></td></mdl<> | |
| Conductivity | umhos/cm | | | | 43 | 192 | 324 | | | 153 | |
| Hardness | mg/L | | | | 31 | 97 | 265.33 | | | 81.3 | |
| Acidity | mg/L | | | | -79 | -11 | 18.4 | | | -78.8 | |
| рН | su | | | | 6.6 | 7.5 | 8.2 | | | 7.59 | |
| ResidueFilterable-TDS | mg/L | | | | 70 | 130 | 218 | | | 132 | |
| ResidueNonFilterable-TSS | mg/L | | | | 7 | 40 | 96 | | | 52 | |
| SAR | | | | | 0.129 | 0.233 | 0.489 | | | 0.165 | |
| Sulfate | mg/L | | | | <mdl< td=""><td>16</td><td>76.97</td><td></td><td></td><td>0.52</td><td></td></mdl<> | 16 | 76.97 | | | 0.52 | |
| Calcium (Dissolved) | mg/L | | | | 5.9 | 21.1 | 42.6 | | | 21.2 | |
| Iron (Dissolved) | mg/L | | | | 0.01 | 0.22 | 0.57 | | | 0.245 | |
| Iron (Total) | mg/L | | | | 0.03 | 1.39 | 2.13 | _ | | 2.13 | |
| Magnesium (Dissolved) | mg/L | | | | 3.5 | 9.8 | 38.6 | | | 6.89 | |
| Manganese (Total) | mg/L | | | | <mdl< td=""><td>0.061</td><td>0.0807</td><td></td><td></td><td>0.0807</td><td></td></mdl<> | 0.061 | 0.0807 | | | 0.0807 | |
| Sodium (Dissolved) | mg/L | | | | 2.0 | 5.0 | 9.87 | _ | | 3.48 | |
| TDS Ratio (grav./calc.) | | | | | 0.77 | 1.00 | 1.13 | | | _ | |

Pond 10-1 is a man made pond (approximately 20' x 20') with an earthen berm located on the south side. The pond is located in the SW1/4SE1/4 of Section 10, T13S, R92W. Source of surface water is from the Overalnd Ditch via a man made drainage. (Simon Hydro Search, 92)

P1007 East Roatcap Creek - Pond 10-7 Depth - 4' Elevation -8350

| Initiated | 10/1/1991 | 10/1/1991 | 10/1/1991 | 10/1/1991 |
|-----------|------------|-----------|-----------|-----------|
| Activated | 2/1/1996 | 2/1/1996 | 2/1/1996 | 2/1/1996 |
| Date | 11/10/2015 | 9/11/2015 | 6/21/2015 | 4/10/2015 |

| | | | | | | Date | | 11/10/2013 | 9/11/2013 | 0/21/2013 | 4/10/2013 |
|--------------------------|---------------------|---|---|---|---|-------|--------|------------|-----------|------------------------------|-----------|
| | Summary Information | | | | | | | | | | |
| Field | | Baseline | е | | Operation | | | | | | |
| Parameters | UNITS | Min | Ave | Max | Min | Ave | Max | | | | |
| Flow | GPM | 0.0 | 12.8 | 200 | 0.0 | 4.9 | 52.2 | 0.65 | 3 | 15 | 5 |
| Freeboard | Feet | | | | 0.0 | 0.7 | 13.1 | | | 13.1 | 0 |
| Temperature | Celsius | 0.6 | 8.6 | 20.5 | 0.5 | 10.1 | 21.2 | 7.8 | 8 | 18.3 | 9.8 |
| Conductivity | umhos/cm | 130 | 375 | 540 | 160 | 357 | 570 | 390 | 360 | 330 | 350 |
| рН | su | 6.4 | 7.6 | 8.4 | 6.9 | 8.0 | 8.5 | 8.2 | 8.2 | 8.4 | 8.1 |
| Field Comments | | | | | | | | | | | |
| Lab | | | | | | | | | | | |
| Parameters | UNITS | | | | | | | | | | |
| Bicarbonate | mg/L | 66.0 | 74.0 | 82 | 74.3 | 192.4 | 288 | | | 157 | |
| Carbonate | mg/L | <mdl< td=""><td><mdl< td=""><td><mdl< td=""><td><mdl< td=""><td>3.7</td><td>20</td><td></td><td></td><td><mdl< td=""><td></td></mdl<></td></mdl<></td></mdl<></td></mdl<></td></mdl<> | <mdl< td=""><td><mdl< td=""><td><mdl< td=""><td>3.7</td><td>20</td><td></td><td></td><td><mdl< td=""><td></td></mdl<></td></mdl<></td></mdl<></td></mdl<> | <mdl< td=""><td><mdl< td=""><td>3.7</td><td>20</td><td></td><td></td><td><mdl< td=""><td></td></mdl<></td></mdl<></td></mdl<> | <mdl< td=""><td>3.7</td><td>20</td><td></td><td></td><td><mdl< td=""><td></td></mdl<></td></mdl<> | 3.7 | 20 | | | <mdl< td=""><td></td></mdl<> | |
| Chloride | mg/L | 1.0 | 1.0 | 1 | <mdl< td=""><td>28.5</td><td>173.71</td><td></td><td></td><td>1</td><td></td></mdl<> | 28.5 | 173.71 | | | 1 | |
| Conductivity | umhos/cm | 128.0 | 141.0 | 154 | 99 | 368 | 508 | | | 298 | |
| Hardness | mg/L | 63.0 | 67.5 | 72 | 91 | 180 | 260 | | | 158 | |
| Acidity | mg/L | | | | -163 | -22 | 37 | | | -163 | |
| рН | su | 7.6 | 7.8 | 7.9 | 7.3 | 7.9 | 8.5 | | | 8.22 | |
| ResidueFilterable-TDS | mg/L | 88.0 | 89.0 | 90 | 110 | 257 | 356 | | | 210 | |
| ResidueNonFilterable-TSS | mg/L | 6.0 | 6.0 | | <mdl< td=""><td>19.1</td><td>65</td><td></td><td></td><td>24</td><td></td></mdl<> | 19.1 | 65 | | | 24 | |
| SAR | | 0.2 | 0.2 | 0.26 | 0.15 | 0.46 | 0.767 | | | 0.291 | |
| Sulfate | mg/L | 12.0 | 12.0 | 12 | <mdl< td=""><td>7.4</td><td>20</td><td></td><td></td><td>2.3</td><td></td></mdl<> | 7.4 | 20 | | | 2.3 | |
| Calcium (Dissolved) | mg/L | 15.8 | 17.4 | 19 | 20.3 | 41.7 | 65.2 | | | 40 | |
| Iron (Dissolved) | mg/L | | | | 0.05 | 7.82 | 38.5 | | | 38.5 | |
| Iron (Total) | mg/L | | | | 0.22 | 1.00 | 2.25 | | | 0.88 | |
| Magnesium (Dissolved) | mg/L | 5.7 | 5.8 | 6 | 8.6 | 18.2 | 33.16 | | | 14.2 | |
| Manganese (Total) | mg/L | | | | 0.01 | 0.13 | 0.44 | | | 0.137 | |
| Sodium (Dissolved) | mg/L | 4.0 | | | 3.8 | 14.2 | 25 | | | 8.75 | |
| TDS Ratio (grav./calc.) | % | <mdl< td=""><td><mdl< td=""><td><mdl< td=""><td><mdl< td=""><td>0.94</td><td>1.15</td><td></td><td></td><td></td><td></td></mdl<></td></mdl<></td></mdl<></td></mdl<> | <mdl< td=""><td><mdl< td=""><td><mdl< td=""><td>0.94</td><td>1.15</td><td></td><td></td><td></td><td></td></mdl<></td></mdl<></td></mdl<> | <mdl< td=""><td><mdl< td=""><td>0.94</td><td>1.15</td><td></td><td></td><td></td><td></td></mdl<></td></mdl<> | <mdl< td=""><td>0.94</td><td>1.15</td><td></td><td></td><td></td><td></td></mdl<> | 0.94 | 1.15 | | | | |

Pond 10-7 is a man made pond (approximately 25' x 25') with an earthen dam on the south side. The pond is located in the NE1/4SE1/4 of Section 10, T13S, R92W. Source of surface water is from natural runoff and the Overland Ditch. (Simon Hydro Search, 92)

Magnesium (Dissolved)

Manganese (Total)

Sodium (Dissolved)

TDS Ratio (grav./calc.)

Ground Water

SM07 Monitoring Well SM-7 Depth - 55' Top of Pipe Elevation - 7800' Pipe 2.5' Above Ground

| | | | | | | Initiated | | 8/22/1985 | 8/22/1985 |
|--------------------------|----------|---|---|---|---|---|---|---|---------------------|
| | | | | | | Activate | d | 10/1/1997 | 10/1/1997 |
| | | | | | | Date | | 6/17/2015 | 10/24/2014 |
| | | Summa | ry Inform | nation | | | | | _ |
| Field | | Baseline | е | | Operation | on | | | |
| Parameters | UNITS | Min | Ave | Max | Min | Ave | Max | | |
| Static Water Level | Feet | 18.2 | 26.2 | 32.3 | 0.0 | 27.3 | 45.0 | 24.62 | 28.83 |
| Water Elevation | Feet | 7767.7 | 7773.8 | 7781.8 | 7755.0 | 7772.7 | 7800.0 | 7775.38 | 7771.17 |
| Temperature | Celsius | 6.0 | 9.2 | 15.8 | 6.4 | 8.1 | 10.3 | 9.2 | 8.7 |
| Conductivity | umhos/cm | 180 | 267 | 510 | 180 | 249 | 580 | 270 | 240 |
| pН | su | 6.8 | 7.6 | 8.5 | 6.8 | 7.4 | 7.8 | 7.1 | 7.2 |
| Field Comments | | | | | | | | | |
| Lab | | | | | | | | | _ |
| Parameters | UNITS | | | | | | | | |
| Bicarbonate | mg/L | 102 | 165 | 680 | 64 | 117 | 198 | 115 | 98.5 |
| Carbonate | mg/L | <mdl< td=""><td><mdl< td=""><td><mdl< td=""><td><mdl< td=""><td><mdl< td=""><td><mdl< td=""><td><mdl< td=""><td><mdl< td=""></mdl<></td></mdl<></td></mdl<></td></mdl<></td></mdl<></td></mdl<></td></mdl<></td></mdl<> | <mdl< td=""><td><mdl< td=""><td><mdl< td=""><td><mdl< td=""><td><mdl< td=""><td><mdl< td=""><td><mdl< td=""></mdl<></td></mdl<></td></mdl<></td></mdl<></td></mdl<></td></mdl<></td></mdl<> | <mdl< td=""><td><mdl< td=""><td><mdl< td=""><td><mdl< td=""><td><mdl< td=""><td><mdl< td=""></mdl<></td></mdl<></td></mdl<></td></mdl<></td></mdl<></td></mdl<> | <mdl< td=""><td><mdl< td=""><td><mdl< td=""><td><mdl< td=""><td><mdl< td=""></mdl<></td></mdl<></td></mdl<></td></mdl<></td></mdl<> | <mdl< td=""><td><mdl< td=""><td><mdl< td=""><td><mdl< td=""></mdl<></td></mdl<></td></mdl<></td></mdl<> | <mdl< td=""><td><mdl< td=""><td><mdl< td=""></mdl<></td></mdl<></td></mdl<> | <mdl< td=""><td><mdl< td=""></mdl<></td></mdl<> | <mdl< td=""></mdl<> |
| Chloride | mg/L | 2 | 5 | 13 | <mdl< td=""><td>33.8</td><td>199</td><td>2.5</td><td>32.51</td></mdl<> | 33.8 | 199 | 2.5 | 32.51 |
| Conductivity | umhos/cm | 229 | 280 | 362 | 218 | 296 | 506 | 234 | 247 |
| Hardness | mg/L | 103 | 139 | 193 | <mdl< td=""><td>143</td><td>478</td><td>113</td><td>125.81</td></mdl<> | 143 | 478 | 113 | 125.81 |
| Acidity | mg/L | | | | -118 | -3 | 18 | -118 | 2 |
| pН | su | 6.5 | 7.2 | 8.0 | 6.5 | 7.2 | 8.3 | 7.02 | 7.15 |
| ResidueFilterable-TDS | mg/L | 117 | 164 | 220 | 110 | 207 | 377 | 147 | 215 |
| ResidueNonFilterable-TSS | mg/L | 8 | 257 | 846 | <mdl< td=""><td>38</td><td>154</td><td>5.5</td><td>35</td></mdl<> | 38 | 154 | 5.5 | 35 |
| SAR | | 0.19 | 0.24 | 0.29 | 0.12 | 0.51 | 2.68 | 0.263 | 0.969 |
| Sulfate | mg/L | <mdl< td=""><td>19</td><td>78</td><td><mdl< td=""><td>11.3</td><td>30.0</td><td>5.7</td><td>12.76</td></mdl<></td></mdl<> | 19 | 78 | <mdl< td=""><td>11.3</td><td>30.0</td><td>5.7</td><td>12.76</td></mdl<> | 11.3 | 30.0 | 5.7 | 12.76 |
| Calcium (Dissolved) | mg/L | 1.9 | 40.4 | 59.0 | 19.8 | 38.5 | 120.3 | 34 | 36.2 |
| Iron (Dissolved) | mg/L | | | | <mdl< td=""><td>0.08</td><td>0.35</td><td><mdl< td=""><td>0.02</td></mdl<></td></mdl<> | 0.08 | 0.35 | <mdl< td=""><td>0.02</td></mdl<> | 0.02 |
| Iron (Total) | mg/L | | | | 0.02 | 0.23 | 0.77 | 0.0635 | 0.13 |
| | | | | | | | | | |

Shallow monitoring wells SM-1 through SM-11 were constructed in 1985 in order to gather additional information on alluvial/colluvial deposits within the permit boundary. They are depicted on Map 4-1.

6.0

6.0

0.95

mg/L

mg/L

mg/L

%

7.9

6.8

1.07

11.0

8.3

1.19

5.5

6.2

0.85

<MDL

11.2

0.019

15.1

78.8

0.060

105.8

1.58

6.75

6.56

0.0208

8.6

0.01

1.01

25