



COLORADO
Division of Reclamation,
Mining and Safety
Department of Natural Resources

1313 Sherman Street, Room 215
Denver, CO 80203

August 28, 2017

Sara Glinatsis
Sunrise Mining LLC
P.O. Box 160
Arvada, CO 80001

RE: May Day Idaho Mine Complex, File No. M-1981-185, 112d-2 Updated Surface and Ground Water Characterization, Amendment (AM-2) Adequacy Review

Dear Ms. Glinatsis:

The Division of Reclamation, Mining and Safety (Division) is in the process of reviewing the above referenced document and supporting data in order to ensure that it adequately satisfies the requirements of the Colorado Mined Land Reclamation Act (Act) and the associated Mineral Rules and Regulations of the Colorado Mined Land Reclamation Board for Hard Rock, Metal, and Designated Mining Operations (Rules). During review of the material submitted, the Division determined that the following issues of concern need to be clarified or addressed.

While it is not required, the Division would appreciate the response to this review to be in one submittal and formatted in a way that the responses can be inserted in their respective exhibits in the previously submitted 3-Ring Binders or replace the Exhibit entirely with the changes bolded. The items that require attention are;

1. In section 7.2 Groundwater, the Ground water wells are discussed in detail. The permit number for the Idaho well is inconsistent with the list in Appendix C. Please clarify the Division of Water Resources permit number for each well, and also provide copies of the approved permits for each well located on site.
2. Also in the same section, table 3C is referenced which depicts the Groundwater Standards of CDPHE's Regulation 41. While this table is appropriate for the Groundwater section of the characterization, it is not appropriate for the surface water. Please submit an additional table showing the applicable surface water quality standards.
3. In Section 7.3 Surface Water Quality, it is stated that the CDPHE Stream Classification for the La Plata River is listed with a "temporary Use" water quality designation. However in Exhibit U, section 6.4.21(11) the Operator stated that the classifications that apply to the La Plata River area Aquatic Cold 1, Recreation P, Water Supply and Agriculture. Please clarify which water quality designation applies and provide a table of the applicable receiving stream water quality standards.
4. In Section 7.3.1 Surface Water Quality as well as in Section 7.3.2 Groundwater quality, an email correspondence is referred to in which the Division stated that "After 5 quarters of sampling events, analytes that repeatedly register undetectable concentrations in the



analysis, may be eliminated subject to DRMS Approval.” No such approval has been given, therefore all analytes, including the ones the Operator suggests removing from the sampling / analytes list must continue to be analyzed for. The proposal of removal of analytes or modification of sampling protocol, including sampling intervals, must be made addressed through the Technical Revision process to allow to the Division to review the proposal.

5. In Sections 8.0, 8.1, 8.2 as well as in Figure 10 it is claimed that the underground workings of both the May Day and the Idaho Mine contain water. More specifically Figure 10 identifies that the 545 level is flooded and potentially expressing itself through the Idaho seep through faults and fractures. This demonstrates a direct hydrologic connection between the May Day and Idaho Mine workings. This information was not contained in Exhibits D, G or Exhibit U. In the mining plan the flooded workings must be addressed. Please submit a narrative, as well as update any applicable Exhibits in the Amendment Application that addresses the following questions; Are the mining activities expected to take place on those levels? Will the activities impact the mine pool in any way? Is there a plan to drain the mine pool, and if so, what is the quality of that water? Will that water require treatment, and or a discharge permit?

If the activities are not expected to impact the mine pool, that information needs to be clearly stated in Exhibit D as well as this document. Any future change in the mining plan that would result in an impact to the quantity and or quality of that water will need to be addressed through the Technical Revision or Amendment processes.

6. The findings of the characterization data should be summarized in the narratives of each of their respective classifications. For example in Section 7.3.1 a narrative should exist discussing the average concentrations of all constituents that were analyzed for including those that register as undetectable. Included in this narrative should be a table showing the average concentration of each constituent over time from the beginning of the 5 quarter sampling period to the most current data collected. The same should exist for Section 7.3.2 Groundwater Quality. Furthermore this data should be included in the applicable sections of Exhibit D, Exhibit G and Exhibit U. Stating that the “water quality can be considered excellent” is not sufficient. Please submit and clarify this information.
7. The current data presented in tables 4-13 as well as the data submitted on both May 19, 2017 and July 27, 2017 is excessive and difficult to follow. However at the end of each section is a summary table that includes the sample date, analyte, abbreviation, analysis method, units, results as well as the applicable water quality standards. This table is the preferred method of presenting water quality data. Please collate all of the data into a series of table in this format, separated by sample location, with each column properly labeled, and sample date for each of the applicable 5 quarters of data. Historical and raw



data may be submitted as appendices, but the table should show the summarized results and the raw data may be referred too for verification purposes.

Although it is not required, the Division asks that the Operator please submit a digital copy of the water quality tables in a Microsoft Excel Workbook. Submitting this will assist the Division in record keeping, analysis and future decision making. This can be completed by saving the Excel Workbook to a thumb drive, and including it with the response to this adequacy review.

8. The table of contents for the tables of data found on page 29 does not match the order in which the data is included. The Division recognizes that this may change with the response to this adequacy review so please include a correct table of contents with the updated data and information.

Please submit your responses to the above listed issues by **Friday, September 29, 2017** in order to allow the Division sufficient time for review. Note that this review is not considered final, and any other material submitted must be reviewed which may generate additional clarifications and / or corrections. If the requested information, nor an extension requested is received by the above listed date, your amendment application may be denied. The Division will continue to review your application and will contact you if additional information is needed.

If you require additional information, or have questions or concerns, please contact me at the Division's Grand Junction Field Office, by phone at (970)-243-6368 or by email at lucas.west@state.co.us.

Sincerely,



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Cc: Russ Means, Senior Environmental Protection Specialist
Jeff Fugate, DRMS Minerals AGO

Ec: George Robinson, R² Inc.

