



COLORADO

Division of Reclamation,
Mining and Safety

Department of Natural Resources

1313 Sherman Street, Room 215
Denver, CO 80203

Interoffice Memorandum

October 3, 2018

From: Leigh Simmons
To: Rob Zuber

**Subject: New Elk Mine (Permit No. C-1981-012)
TR-73
Review of proposed reduction to the water monitoring plan**

New Elk Company have proposed reduced monitoring of groundwater wells at the New Elk mine while the mine remains inactive. I have the following comments.

1. Minor changes should be made to the proposed language used in the footnote to Table 27, and in the text of pages 109 and 109a. Specifically:
Monitoring of the wells is suspended while the mine remains inactive, but the full monitoring program will be resumed prior to any resumption of mining.
2. NE-1-10 (which is completed in the Allen seam, approximately 1000' from existing mine workings, down the projected potentiometric gradient) should be excluded from the reduced monitoring requirements; historic data from the well should be included in the AHR together with data from the current monitoring period.
3. The currently approved groundwater monitoring program at the New Elk mine is limited in terms of its scope; for example there are no identified groundwater points of compliance within the permit area, nor are there any upgradient bedrock monitoring wells. I am not in a position to make any further recommendations at this time, since I have not thoroughly evaluated the monitoring program during the preparation of this memo.

