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**INTEROFFICE MEMORANDUM**

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**TO:** JANET BINNS

**FROM:** ROBERT D. ZUBER *Rhot D. Z*

**SUBJECT:** BOWIE NO. 2 MINE, TR-117 ADEQUACY REVIEW

**DATE:** 1/2/2019

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Janet –

I reviewed Stover's submittal for TR-117. In general, I am ok with them reducing monitoring frequency, but I have the following comments:

1. Rather than sample in "second or fourth quarter," as they say, they should sample in second quarter, at least for surface water. It is more important to see what the concentrations are during higher periods of runoff when loading to the river could be significant. Also, there is the likelihood that during future fourth quarters there will be no flow at some sampling points, and we prefer to get data that is more than "no discharge."
2. At least one year before any Phase III bond release applications are submitted, the operator needs to resume sampling semi-annually, as per the current requirement in the PAP. This will provide enough hydrology information for DRMS to write the findings related to the bond release.
3. There appears to be an error in the PAP. In the first paragraph at the top of page 2.05-125, the Hubbard Creek locations are listed but not the Terror Creek locations. This is confusing to the reader.