



**Date: February 16, 2021**

**From: Rob Zuber**

**To: Janet Binns**

**Re: New Horizon Mine, Permit C-1981-008, Review of TR-101**

Janet –

Here are my comments on TR-101. I wrote them in a format that should be easy to copy and paste into an adequacy letter (instead of “I” I wrote “the Division”).

The Division agrees with Tri-State that AHRs are generally sufficient for a demonstration of the need (or lack thereof) for particular monitoring locations.

The Division agrees that Wells GW-N16P1, GW-N17P1, and GW-N18P1 are no longer needed, since the upgradient area (other than a small reclaimed road) has been removed from the permit via the bond release process.

The Division agrees that Wells GW-N41, GW-N42, and GW-N43 are no longer needed, because they are upgradient wells, and historical data can generally be used for comparison to downgradient data for the purposes of AHRs and bond release applications. Also, Tri-State states that these are redundant given the fact that Wells GW-N36, GW-N37, and GW-N38 can be used for upgradient data. The Division agrees with this statement, and (as an example of the similarities) we note that total recoverable iron concentrations were steady in all of these wells for most of the period of record, but in recent years the data indicate large increases for GW-N36, GW-N38, GW-N41, and GW-N43.

The Division agrees that Well GW-N3 is not necessary to characterize the impacts of mining, and can be removed from the list of monitoring sites.

The Division agrees that surface monitoring site SW-N104 is not needed to characterize mining impacts on Tuttle Draw or other receiving waters.

The Division does have two formatting issues to address:

- 1. It appears that the first submitted page for Section 2.04.7 does not fit with the currently approved page.** At the top of page 2.04.7-27 in the approved PAP, the initial text (an extension of the sentence from the previous page) reads “standards from the San Miguel River.” However, the proposed page (also an extension from previous page) reads “two sample sets collected at each surface water site.” **Please address this apparent problem.**
- 2. Some wells on the proposed version of Map 2.04.7-1A are indicated with a mustard color, which (according to the map legend) is used for surface water sites. Please revise the map to fix this inconsistency.**

