



**COLORADO**  
**Division of Reclamation,  
Mining and Safety**  
Department of Natural Resources  
1313 Sherman Street, Room 215  
Denver, CO 80203

March 8, 2021

Brian Briggs  
Ouray Silver Mines, Inc.  
PO Box 564  
Ouray, CO 81427

**RE: Revenue Mine, Permit No. M-2012-032, Technical Revision (TR-12), Adequacy Review-1**

Dear Mr. Briggs:

The Division of Reclamation, Mining and Safety (Division) is in the process of reviewing the above referenced Technical Revision 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 issue(s) of concern need to be adequately addressed before the Technical Revision can be considered for approval. Please provide the following:

1. Throughout the revision materials submitted, Table 2 is referenced however Table 2 was not included in the TR package. Please provide Table 2 - GW-4 and SW-22 Sample Results.
2. Section 3.1 states that the Oil and Grease sample results have not yet been received back from the lab. Please provide the Division with the results and a narrative once received.
3. Provide the rationale as to why the proposed location of GW-4R was selected. Provide evaluations regarding geology, historic use of the area, and groundwater flow rate and direction and how these compare to the original GW-4 location.
4. The goal for GW-4 required by TR-10 was to facilitate the monitoring of the passive water treatment system specifically for impacts to water quality. Given that pond 3 is lined and now a surface discharging facility, GW-4 would serve as a leak detection system, an Environmental Protection Facility (EPF). What would be the proposed replacement EPF to ensure that pond 3 is functioning correctly if GW-4 is to be abandoned?
5. The proposed location of GW-4R is distant and down gradient from pond 3 than GW-4 thus it would not isolate the water quality impacts from the passive treatment system alone. Therefore, it is inferred that GW-4R would be a generic groundwater monitoring well for the entire Revenue Mine site. Please provide the justification as to why GW-4R is being proposed to replace GW-4, despite being a well with a seemingly different purpose.
6. The proposed GW-4R is a replacement EPF. Pursuant to Rule 6.4.21(7) Prior to approval the Division will require the proposed well construction schematics, well location, drilling methods, cuttings handling and circulation water handling.
7. Contours on Map 1 suggest that the proposed GW-4R will be located at approximately the same



elevation as GW-4 but will be twice the depth. Please provide justification of the construction details of the proposed GW-4R. The justification should address but is not limited to the reasoning for the increased depth, purpose behind the use of a packer/bentonite plug and the estimated depth to groundwater contact.

8. In verbal discussions prior to the submission of TR-12, a faulty drill rig was initially suspected to be the source of the contamination of GW-4. What measures will be taken to minimize the chance of contamination when constructing the proposed GW-4R.
9. Commit to adding an initial complete hydrocarbon analytical suite to GW-4R once completed. And if results indicate hydrocarbons continue to sample for those constituents quarterly.
10. Section 4.1 Characterization and Monitoring Plan Implementation states that OSMI's voluntary effort may include three conditions to further characterize the pollutant. Also, verbal discussions indicated a third party consultant would be retained to complete the characterization of the contaminant. Please commit to and provide the Division with a detailed plan and estimated time of completion for a complete characterization of the contaminant sufficient enough to identify the source, extent, composition and potential impacts of the contaminant discovered in GW-4.
11. Given that DRO's were detected in SW-22 will additional upgradient and downgradient sampling for DRO's be conducted as part of the characterization to be completed by a third party consultant, if so please indicate which locations will be sampled?
12. SW-22 has been selected for a temporary surface water sampling point. Will this become a permanent surface sampling point moving forward?
13. No commitment was made for monthly sampling, analysis and reporting as required by the Division's February 1, 2021 letter. Please commit to monthly sampling of at a minimum GW-4, SW-22 and GR-4R (once completed) until the problem can adequately be addressed.

Please submit your response(s) to the above listed issue(s) by Monday, March 29, 2021 in order to allow the Division sufficient time for review. If you cannot address the above issues including providing sampling results by March 29, 2021 please request an extension to the decision due date to ensure adequate time for the Division to review materials. A decision due date of **April 2, 2021** has been set. If any adequacy issues remain by the decision due date the Division may deny your request.

The Division will continue to review your Technical Revision and will contact you if additional information is needed. If you require additional information, or have questions or concerns, please feel free to contact me.

Sincerely,



**Lucas West**  
Environmental Protection Specialist

Ec: Travis Marshall, Senior EPS, DRMS  
Amy Yeldell, DRMS  
Briana Geer, OSMI  
Todd Jesse, OSMI