



Interoffice Memorandum

December 13, 2024

From: Leigh Simmons
To: Amy Yeldell

**Subject: Whirlwind Mine (Permit No. M-2007-044)
Groundwater Monitoring**

As we discussed, the changes proposed to the operation plan at the Whirlwind Mine with TR-2 have to do with improving the quality of water discharged from the treatment facility. Nothing that has been proposed with TR-2 has the potential to increase negative impacts to groundwater quality (or surface water quality) compared to the currently approved plan.

The operator's submission of TR-2 prompted a review of the currently approved permit by the Division, during which it became apparent that aspects of the hydrologic monitoring plan should be brought into line with current best practice before the mine returns to production. This will likely involve

- i. establishing one or more groundwater points of compliance
- ii. formalizing the standard(s) to apply at those points
- iii. agreeing Numeric Protection Limits for individual groundwater quality parameters reflective of the applicable standard(s)

I think we are in agreement that the Division should communicate these expectations to the operator well in advance of the anticipated resumption of mining to allow time for the development of a thorough plan that will be protective of the hydrologic balance and in accordance with the Division's current guidance.

I suggest that the Division requests the submission of a new Technical Revision to address these issues, rather than hold up the approval of TR-2. I will draft some text that you can use in a letter to the operator.

