



COLORADO
Division of Reclamation,
Mining and Safety
Department of Natural Resources

June 10, 2025

Chris Skerik
Thorin Resources, LLC
1900 Main St. Unit #1
Ouray, CO 8132

RE: Revenue Mine, File No. M-2012-032, 112d Designated Mining Operation Amendment Application (AM-02), EPF Construction – Certification Adequacy Review

Dear Mr. Skerik:

On May 19, 2025, the Division of Reclamation, Mining and Safety (Division) received the Environmental Protection Facility (EPF) construction documentation for GW-4A, GW-4B and stormwater retention pond #2. Construction of these facilities were approved under AM-2. Pursuant to Rule 7.3.2(1) and (2) the operator is required to submit certification information for acceptance from the Division. The Division has reviewed the certification documentation of GW-4A, GW-4B and stormwater retention pond and identified additional adequacy concerns to be addressed prior to certification.

Stormwater retention pond #2:

- 1) Section 2.5 of Exhibit U (pg. U-8) states that Pond #2 would have a zero-discharge for the 10-year 24-hour event. The certification presented by John T Lui states that for the 100-year, 24-hour event the pond would reach maximum capacity at 3.7 hours and would overflow. This certification does not support that this EPF is a zero-discharge facility.
 - a) Please either provide documentation from WQCD that this pond has the necessary discharge permits OR
 - b) Provide analysis for the 10-year 24-hour event that demonstrates the pond is adequate capacity and will not discharge.



GW-4A and GW-4B :

It is noted that these wells were numbered GW-5A/B in some AM-2 revision materials but have formally been designated as GW-4A, GW-4B by DWR. The drilled well locations correspond to the locations proposed in AM-2.

- 2) Section 9.2 of Exhibit U (pg. U-28) committed to providing an updated Map U-1 depicting the actual downgradient well locations. Please provide the updated map.
- 3) AM-2 Exhibit G (pg. G-4) states that "A fourth set of wells will be installed prior to mill certification....The installation of these paired wells will be done pursuant to a technical revision." All information regarding the down gradient monitoring wells construction shall be submitted under a new TR. Upon approval of the TR, the Division will certify the wells pursuant to Rule 7.3.2(3).
- 4) Two copies of DWR's GWS-46 form were provided for well GW-4A and two copies of DWR's form GWS-31 for GW-4B. Please provide the corresponding forms GWS-46 and GWS-31 for each well GW-4A and GW-4B which clearly documents what information was provided to DWR and what information they approved under well permit applications #336489 and 10039132.
- 5) Please ensure that diagrams for wells GW-4A and GW-4B match the information presented on form GWS-31.
- 6) Please include in the TR the proposed abandonment information.
- 7) Photo documentation provided shows open casing. Pursuant to Rule 5.4.4(c) caps the drill hole to prevent unauthorized entry. These monitoring wells should not be left unsecured.
 - a) Similarly, DWR 2 CCR 402-2, Rule 14.3 also requires locking covers or casing caps on wells.

If you require additional information, or have questions or concerns, please feel free to contact me.

Sincerely,



Amy Yeldell

Environmental Protection Specialist

Cc:

Travis Marshall, Senior EPS, DRMS

Lucas West, DRMS