



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

25 July 2024

Ms. Miranda Kawcak
Seneca Property, LLC
29515 Routt County Road #27
Oak Creek, CO 80467

**RE: Technical Revision TR54
Yoast Mine, Permit No. C1994082**

Dear Ms. Kawcak;

The Division has completed its preliminary review of Yoast Mine's permit revision Technical Revision No. 54, TR54 received by the Division on 21 April 2025 via electronic submission. DRMS found the proposed revision complete on 1 May 2025. The Division received a response to preliminary adequacy on 16 July 2025. Upon review of the response, additional questions came up. The proposed decision due date is 25 July 2025; therefore, an extension will be required. Please submit responses to the second adequacy at your earliest convenience and also request an extension to allow ample time for DRMS to review and respond. In order for DRMS to make a finding for discontinued monitoring Seneca Properties must provide information, **analysis, data** and abandonment methods to support the review of the technical revision.

Please see the Division's questions below regarding the applications compliance with the following Rules.

2.07.3.	2.05.6(3)	4.07.3
4.07.4		4.05.14

Adequacy questions answered in the response below are numbered and in bold.

DRMS 5 May 2025

Rule: 2.07.3

Seneca Properties has not yet provided proof of publication for the Yoast Mine TR 54

1. Please Provide Proof of Publication.

DRMS 24 July 2025

Received



DRMS 8 May 2025

Rule 2.05.6

DRMS reviews annual hydrology reports individually on an annual basis. DRMS notes that in Permit Tab 15 *Hydrologic Monitoring Program* the Technical Revision 47 section states that Seneca Properties committed to restart monitoring one year prior to final bond release, the discontinued parameters (aluminum, arsenic, boron, cadmium, chloride, chromium, copper, lead, mercury nickel and zinc) and returning the sampling frequency from annual to biannual. Several wells as per Table 15-8 of the current monitoring plan in the permit were suspended with monitoring discontinued until one year prior to final bond release. Seneca Properties provided Table 15-8 with the TR54 application summarizing monitoring sites at the Yoast Mine.

DRMS finds in the 2024 water year Annual Hydrology Report the annual monitoring results for wells not suspended, however DRMS does not find the semiannual and annual results for the wells designated suspended in Table 15-8 Ground Water Monitoring Frequencies (Pgs.31 and 32) of Tab 15 *Hydrologic Monitoring Program*.

- 2. Please indicate to DRMS that monitoring occurred for the suspended wells for the 2023-2024 water year as per Tab 15 of the permit and cite the reference document for this data.**

DRMS 24 July 2025

DRMS received a data table indicating that monitoring occurred on 29 and 30 May 2025 for seven ground water wells. DRMS does not find the water quality data sheets for these wells in the 2014 and 2015 AHR's. No summary or analysis of the data was provided to explain excursion if any or the impact to the hydrologic balance and hydrologic consequences.

- 2A. Please provide a data analysis discussing excursions if any and the impact if any to the hydrologic balance and hydrologic consequences when compared to the 2014 and 2015 data.**
- 2B. Please provide the data sheets in the 2014 and 2015 AHR's for the 7 Yoast wells referenced in the summary table provided in the response to adequacy.**

DRMS 8 May 2025

Rule: 4.05.14, 4.07.3 and 4.07.4

- 3. Will any wells including any proposed for reduced monitoring remain post-bond release? If so, please identify them and provide proof these wells are approved to remain for other purposes by the Colorado Division of Water Resources (State Engineer); and/or please provide proof these wells have been legally transferred in accordance with Rule 4.05.14?**
- 4. Pursuant to Rule 4.07.3(2)(c) please provide abandonment reports for any wells abandoned as per Table 1.**

5. Also, Pursuant to Rule 4.07.3(2)(c) please provide abandonment reports for any wells planned to be abandoned prior to final bond release.

DRMS 24 July 2025

Once wells are fully abandoned Seneca properties will provide the reports.

DRMS has no further questions regarding the above mentioned permitting action.

Sincerely,



Robin Reilley, M.S. GISP
Environmental Protection Specialist II
Robin.reilley@state.co.us