



25 July 2024

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

**RE: Technical Revision TR83
Seneca IIW Mine, Permit No. C1982057**

Dear Ms. Kawcak;

The Division has completed its preliminary review of **Seneca IIW Mine's** permit revision Technical Revision No. 83, TR83 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)	4.07.4
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Adequacy questions below are numbered and in **italics**.

DRMS 5 May 2025

Rule: 2.07.3

Seneca IIW has not yet provided proof of publication for TR83.

1. Please Provide Proof of Publication.

DRMS 24 July 2025

Received

Seneca Properties requests removal of all ground water monitoring in preparation for abandonment procedures to take place prior to final release of the site through the SL8 termination of jurisdiction bond release scheduled for June of 2025.



DRMS 7 May 2025

Rule 2.05.6

DRMS reviews annual hydrology reports individually on an annual basis. DRMS notes that in Permit Section Appendix 15-3A *Current Hydrologic Monitoring Program* the most recent 2016 revision Seneca Properties committed to abandoning certain wells DRMS notes as per page 15-3a-6 wells with a double strikethrough will be abandoned. Wells with a single strikethrough will be suspended (ie, monitoring will be discontinued until one year prior to final bond release for the entire suite of parameters). 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, triannual and annual results for the wells designated suspended in Table I (Pg. 15 – 3a-6) of Appendix 15-3A).

- 2. Please indicate to DRMS that monitoring occurred for the suspended wells for the 2023-2024 water year as per Appendix 15-3A 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 (Well WHAL10), and any others and the impact of these excursions 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 Seneca II W wells referenced in the summary table provided in the response to adequacy.**

DRMS 7 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,

A handwritten signature in blue ink that reads "Robin Reilley". The signature is written in a cursive, flowing style.

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