

INFORM

INFORMATION NETWORK FOR
RESPONSIBLE MINING

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June 4, 2013

Mr. Wally Erickson
Environmental Protection Specialist
Division of Reclamation, Mining and Safety
Durango Field Office
691 CR 233, Room A2
Durango, CO 81301

Via e-mail to wally.erickson@state.co.us

Re: Wanakah Mine Notice of Intent, Permit No. P-2013-009

RECEIVED
JUN 04 2013
Durango Field Office
Division of Reclamation,
Mining and Safety

Dear Mr. Erickson,

Thank you for the opportunity to submit comments and questions on the proposed Notice of Intent for the Wanakah Mine in Ouray County, Permit No. P-2013-009. The Notice of Intent was made available for public review on May 20, 2013. The Information Network for Responsible Mining (INFORM) is a Colorado-based citizens organization that advocates for responsible hardrock mining practices and protection of affected communities and the environment.

The Wanakah Mine is sited on private mining claims adjacent to National Forest public lands in the Uncompahgre River watershed. The Notice of Intent describes a large exploration project, including the reopening and rehabilitation of five existing mine portals, development of waste piles, underground exploration and mapping, and surface drilling. A general area map showing the existing site conditions and mining area was not posted with the nonconfidential form, but it would be an important addition to the public file in order to better understand how the mine's features and proposed exploration activities may affect the surrounding lands. Please make such a map available for public review.

We are concerned about the potential impacts to ground and surface waters. The Notice of Intent does not indicate whether there are any water bodies present at the mine or whether ephemeral or intermittent drainages may be affected by exploration. Although the Notice indicates that there is currently no drainage emerging from the portals, does that mean that discharge of water from the

portals is not a possibility? Adequate plans should be in place for how the operator will address water if it is produced during exploration. If that happens, how will acid mine drainage be prevented and/or controlled? If the proposed surface drilling or underground activities produces water during operations, what plans does the prospector have for managing water and controlling its discharge? The Notice does not indicate the inclusion of mud or water pits at the drilling locations.

The prospector proposes to excavate approximately 17,000 tons of waste rock material during exploration and stockpiling the waste on the surface. Will these waste rock piles become permanent features at the mine site? If so, how will they be managed to contain stormwater flows and prevent run-off? Although the Notice itself indicates that stormwater berms will be constructed around the waste piles, the details are in the accompanying maps, which are not available for public review.

The potential for acid-forming materials present in the waste rock or other excavated material has not been documented in the Notice. Because the prospecting period runs through 2015, it indicates that mined materials may be stored on site for lengthy periods, increasing the risk of producing acid drainage, yet this possibility is not addressed in the Notice.

Lastly, although the Wanakah waste pile is indicated not to have any topsoil and will not be revegetated following exploration. However, the Bright Diamond dump will be revegetated. This is unfortunate, as the opportunity should be taken to reclaim both piles in the same manner once activities are concluded, which would result in an improvement to the overall mine site.

We commend the operator for refraining from road upgrades and new road construction in order to access drill locations.

Thank you again for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jennifer Thurston".

Jennifer Thurston
Director
INFORM



STATE OF
COLORADO

Comments on Wanakah NOI

Jennifer Thurston <jennifer@informcolorado.org>

Tue, Jun 4, 2013 at 3:25 PM

To: Wally Erickson <wally.erickson@state.co.us>

Cc: Russ Means <Russ.Means@state.co.us>, Loretta Pineda <loretta.pineda@state.co.us>

Dear Mr Erickson,

I have attached comments on the Wanakah NOI for your consideration.

Thank you in advance,

Jennifer Thurston

Information Network for Responsible Mining

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