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Durango Field Office
Division of Reclamation,
Mining and Safety

July 3, 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

Dear Mr. Erickson,

Thank you for the opportunity to submit comments on the proposed Notice of Intent for the Wanakah Mine in Ouray County, Permit No. P-2013-010, a revision of an earlier NOI that was withdrawn. 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 Notice of Intent proposes the reopening of three portals but does not adequately discuss the potential for acid mine drainage or provide a detailed plan for how water quality will be monitored if it is produced during prospecting activities. An adequate plan should be in place. The current Notice of Intent is a scaled-back version of a previous exploration plan, which the Division determined was a Designated Mining Operation. Clearly the prospector's intent is to advance toward fully reopening the mine and will be required to submit an Environmental Protection Plan in the future, which would require this detailed planning.

As mining development activities progress, the operator should be required to address the existing waste piles and their potential for generating acid mine drainage. The Division should require geochemical analysis of the waste rock piles to determine the potential for generating acid from surface water at the site. According to the recent inspection report, the site has an "abundance of waste rock materials from the historic operation" and the prospector describes the

INFORM

INFORMATION NETWORK FOR
RESPONSIBLE MINING

PO Box 27
NORWOOD, CO 81423

(970) 497-4482
JENNIFER@INFORMCOLORADO.ORG
WWW.INFORMCOLORADO.ORG



site as having “very limited surface access and extreme topography” in correspondence. As such, it is unlikely that disturbance to the historic waste piles can be entirely uncoupled from prospecting. There would be nothing wrong with addressing these issues and the overall site conditions early.

Thank you again for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script, reading "Jennifer Thurston". The signature is written in black ink and is positioned below the word "Sincerely,".

Jennifer Thurston
Director
INFORM



STATE OF
COLORADO

Comments on P-2013-010

Jennifer Thurston <jennifer@informcolorado.org>
To: Wally Erickson <wally.erickson@state.co.us>

Wed, Jul 3, 2013 at 4:06 PM

Dear Mr Erickson,

I have attached some comments on the Wanakah Notice of Intent, P-2013-010.

Thanks in advance,

Jennifer Thurston
Information Network for Responsible Mining
Cell: 212-473-7717
Email: jennifer@informcolorado.org
Web: www.informcolorado.org
Twitter: <https://twitter.com/INFORMining>



INFORM-P2013010-Wanakah-NOI-Comments.pdf
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