

January 30, 2019

Mr. Mark Rudolph
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Re: New Data from River Watch, Animas River Metals Loading Subject-KP

Dear Mr. Rudolph,

I am writing to follow up on my letter to you of November 30, 2018. River Watch, a water quality-monitoring network dedicated to preserving and restoring Colorado's water quality, has recently released Animas River data from the first half of 2018. The new River Watch data further vindicates Colorado Department of Public Health and Environment's plan and its 2002 determination, under the leadership of Doug Benevento, that SGC's bulkheading and remediation was successful and improved water quality in the Animas River.

I have incorporated the first half 2018 River Watch data into the existing data set and analyzed the combined data in accordance with the methodology employed by CDPHE when it concluded that SGC met the CDPHE target and successfully completed its obligations under the Consent Decree. Figure A (attached) depicts the standard residuals for zinc at A-72 over time. The figure shows that CDPHE's target is being met today, as a combined result of SGC's bulkheading and remediation and EPA running its treatment plant at a fraction of its capacity.

CDPHE's target for zinc concentrations has been being achieved since June 2017, shortly after EPA commenced running its water treatment plant. There were two independent elements to CDPHE's Plan to achieve the target: 1) SGC's post May 1996 bulkheading and remediation; and 2) the running of a water treatment plant at Gladstone to treat discharges from certain adits. Each separate element was designed to address a portion of the metals loading and improve water quality. CDPHE's target has only been met on a consistent basis when both elements are in place, which demonstrates the success of each element.

The new River Watch data once again conclusively demonstrates that SGC's bulkheading and remediation was successful and has substantially reduced acid rock drainage and metals loading in the Animas River.

Should you have questions regarding the results or methodology employed to produce the graph, please contact me at slange@knightpiesold.com.

Yours truly,



Steven L. Lange
Senior Geochemist

Cc: Doug Jamison (doug.jamison@state.co.us)

Figure A Animas River Zinc Levels

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Figure A: Animas Zinc Levels

Running Average Data
A-72 South of Silverton, CO

