



March 22, 2019

RE: Notice of release and public comment period for the Draft Environmental Impact Statement for Montana Resources, LLC's amendment application for expansion of the existing Yankee Doodle Tailings Impoundment.

Dear Interested Party:

The Montana Department of Environmental Quality (DEQ) has released a Draft Environmental Impact Statement (EIS) for Montana Resources, LLC's (Montana Resources) amendment application. The amendment application affects multiple operating permits held by Montana Resources. Approval of the amendment application would allow Montana Resources to raise the western embankment of the existing Yankee Doodle Tailings Impoundment (YDTI) to an elevation of 6450 feet, extend the northern boundary of the impoundment, and add other facilities to support this impoundment project. The Montana Resources' Yankee Doodle Tailings Impoundment is located adjacent to and northeast of Butte, Montana.

Montana Resources applied to DEQ for an amendment on October 6, 2017, under the Metal Mine Reclamation Act, Section 82-4-301, *et seq.*, Montana Code Annotated (MCA). Pursuant to Section 82-4-337, MCA, DEQ determined that Montana Resources' amendment application was complete and compliant and, on August 31, 2018, issued Montana Resources a draft amendment approval. Electronic copies of the applications may be viewed by visiting the website (<http://deq.mt.gov/Land/hardrock>).

The Montana Environmental Policy Act (MEPA), Section 75-1-201, *et seq.*, MCA, requires the preparation of an environmental impact statement for state actions that may significantly affect the quality of the human environment. The EIS must include a detailed statement on the environmental impact of the proposed action, alternatives to the proposed action, and a no action alternative. DEQ analyzed several alternatives: a No Action Alternative, a Proposed Action Alternative based on Montana Resources' application submitted to DEQ, and three additional alternatives.

DEQ has identified the West Embankment Drain (WED) Pumpback Elimination at Closure Alternative as the agency's preferred alternative. This alternative incorporates all the features in the Proposed Action Alternative except for it would eliminate pumping the potentially poor-quality seepage water collected in the WED extraction pond back to the tailing pond for approximately 20 years post-closure. WED Pumpback Elimination at Closure Alternative seepage would be diverted to the Continental Pit for storage or to the Horseshoe Bend Treatment Plant for treatment and discharge under the Superfund remedy.

DEQ's Preferred Alternative presents a different scenario for YDTI water management at closure, which necessitates recognition of U.S. Environmental Protection Agency's authority over long-term water management and treatment at the site under the Butte Mine Flooding Operable Unit. Discussions and coordination with all parties in the 2002 Butte Mine Flooding Operable Unit Consent Decree would be needed to review the options and feasibility for handling and treating this water, the potential use of existing or upgraded facilities and infrastructure (e.g. Horseshoe Bend Treatment Plant), and to amend their agreement accordingly.

The Draft EIS is available for public comment from March 22, 2019 – April 22, 2019. All comments submitted to DEQ will become part of the public record for this project and are available for public review, along with the name(s) of the commenter(s). The Draft EIS has been posted on DEQ's website at (<http://deq.mt.gov/Public/eis>).

Digital copies of the Draft EIS may be requested by contacting Craig Jones at (406) 444-0514.

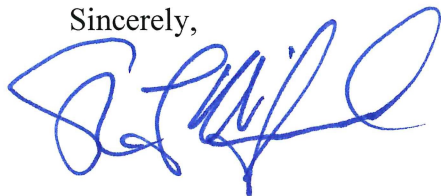
An open house and public meeting will be held to provide the public with information on the proposed project and to provide an opportunity for the public to submit written and/or oral comments. The meeting will be held on Wednesday, April 10 from 5:30-8:30 pm at the Clarion Inn Copper King, 4655 Harrison Avenue, in Butte. The open house portion of the meeting will be held from 5:30 – 6:30 pm. Then, from 6:30 – 8:30 pm, the public will have an opportunity to provide oral and/or written testimony on the Draft EIS.

Written comments may be submitted at the public meeting. In addition, comments may be submitted via electronic mail at DEQMTResourcesMEPA@mt.gov, or postal mail at:

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Comments on the Draft EIS must be received on or before Monday, April 22, 2019.

Sincerely,



Shaun McGrath
Director
Department of Environmental Quality