



January 30, 2018

Tintina Resources Inc.
Attn: John Shanahan
Chief Executive Officer
17 East Main Street
White Sulphur Springs, MT 59645

Re: Update to Proposed Treated Water Disposition for the Black Butte Copper Project

Dear John,

I am responding to your letter dated January 11, 2018 regarding the disposal of treated water at the proposed Black Butte Copper Project. In the operating permit application for the Black Butte Copper Project dated July 14, 2017, Tintina Resources Inc. (Tintina) proposed the use of three Underground Infiltration Galleries (UIGs) for disposal of treated water. Two UIGs were proposed in the upland areas adjacent to the proposed facilities and one UIG was proposed in the Sheep Creek alluvium. In your letter, you proposed to discharge treated water only to the alluvial UIG. This change in the proposed disposition of treated water is already reflected in Tintina's application for a Montana Pollutant Discharge Elimination System (MPDES) permit.

Under Section 82-4-337(2)(a), MCA, an applicant may propose modifications to its operating permit application after issuance of a draft permit but prior to receiving a final permit. If the proposed modifications substantially change the proposed plan of operation or reclamation, the Department of Environmental Quality (DEQ) may terminate the draft permit and begin anew DEQ's review of the application under Section 82-4-337(1), MCA.

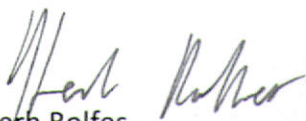
In its operating permit application, Tintina proposed use of the Upland UIGs to dispose the designed maximum discharge rate of 575 gpm of treated water; the alluvial UIG was proposed as a backup to dispose of treated water. Tintina is now proposing to use the alluvial UIG to dispose the 575 gpm of treated water.

Shifting the function of the alluvial UIG from serving as a contingent water disposal location to serving as the location where all treated water will be discharged is not a substantial change requiring DEQ to restart the permitting process under Section 82-4-337, MCA. The modification does not change the basic nature of Tintina's proposed method of disposing of treated mine water --- to underground infiltration galleries. Nor does it change the quality or quantity of the treated water to be discharged.

The use of the alluvial UIG as the sole discharge point for treated water resulted in a small conceptual change to the alluvial UIG providing additional capacity for the discharge. Moreover, the impacts associated with discharging treated water to the alluvial UIG would have to be analyzed to the same extent, whether the alluvial UIG was being proposed as a contingency or as the only location for disposal of treated water. While the analysis obviously will reflect the increased volume of treated water that is proposed to be disposed at the alluvial UIG, the increase will be reflected in the analysis and will not affect the nature of the analysis to be performed by DEQ. Finally, the overall concern regarding the proposed underground disposal of treated water --- potential impacts to surface or underground water resources --- remain the same.

As a result of Tintina's proposed change in regard to the disposal of treated water, the environmental review being conducted for the Black Butte Copper Project will include a Proposed Action proposing only the alluvial UIG as a discharge point. If you have any questions, please contact me at 444-3841 or hrolfes@mt.gov.

Sincerely,



Herb Rolfes
Operating Permit Section Supervisor
Hard Rock Mining Bureau
Department of Environmental Quality
(406)444-3841 or email at hrolfes@mt.gov