To: Jeryl Gardner[JGARDNER@ndep.nv.gov]
Cc: Rodriguez, Dante[Rodriguez.Dante@epa.gov]; Zimmerman, Chuck[CZimmerman@brwncald.com]; John Batchelder[jbatchelder@envirosolve.com]; Cohen, Adam[Adam.Cohen@dgslaw.com]; Johnson, Brian S[Brian.S.Johnson@bp.com]; Lucari, James L[James.Lucari@bp.com]; Mattucci, Rich (BROWN & CALDWELL)[RMattucci@brwncald.com]
From: Oman, Jack
Sent: Wed 2/10/2016 11:03:39 PM
Subject: RE: Draft Work Plan for Enhanced Evaporation
removed.txt
Comments on Draft Work Plan for Enhanced Evaporation Pilot Test 020116.docx

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,,,,,,,
Jeryl,

Thank you for giving ARC the opportunity to comment on this Draft Work Plan. Our only specific technical comments are summarized on the attached table regarding current pump assignments at the site. Due to the lack of specificity in various sections of the document, ARC is still a bit unclear as to how testing performance will be monitored and how the results will be evaluated, but we are relying on NDEP, EPA, and SPS to ensure that implementation of the pilot test does not in any way increase the amount of drain down fluids currently being managed by the FMS or otherwise adversely affect ARC's ability to continue to operate the system.

The plan states that SPS intends to use various FMS components to perform the pilot test. In response to the most recent system operation directives from EPA, going forward we anticipate a more active daily operation of the FMS including more frequent fluid transfers between ponds. With the priority of the FMS components being FMS O&M activities, conflicts could arise where certain equipment may not be available for pilot test activities. SPS may want to consider renting or purchasing dedicated equipment needed for the test to ensure availability. Additionally, it is ARCs expectation that SPS will be responsible for repairing any damage caused to FMS components, including liners, pumps, conveyance lines, etc., resulting from performance of the pilot test.

ARC and SPS have discussed each of our general approaches to implementing field activities. We believe with proper communication and coordination FMS O&M activities (performed by ARC contractors) and Enhanced Evaporation Pilot Test activities (performed by SPS and/or SPS contractors) can be simultaneously performed. In the unlikely event that SPS and/or their contractors need to enter work areas controlled by ARC we will expect the workers to adhere to ARC's HSSE requirements and be familiar with the site Health and Safety Plan.

Please let me know if you have any questions or would like to discuss further.

Thanks,

-jack

Jack Oman
Project Manager

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(714) 670-5195 fax
(714) 330-1706 mobile
jack.oman@bp.com

From: Jeryl Gardner [mailto:JGARDNER@ndep.nv.gov]
Sent: Wednesday, January 27, 2016 12:54 PM
To: Oman, Jack; Dante Rodriguez; Dietrick McGinnis
Subject: FW: Draft Work Plan for Enhanced Evaporation

Hi,

Dante and Jack, you recently received an email from Taurus and delivery of the Enhanced Evaporation Pilot Study Work Plan.

Dietrick, I thought you might like to take a look at it also, so I'm sending it to you as well.

I would like to provide some direction and guidance for your review and comments.

We have discussed this proposed plan and have debated its potential merits. I think we have generally agreed that enhanced evaporation is one possible solution contribution for extending the useful life of the FMS capacity.

So, our comments should be focused on the potential efficacy of the proposed work, how data will be collected and analyzed, generally how O&M will be performed, and health and safety aspects of the work. If there's something missing from the Plan that we would view as essential to the success of Plan implementation and completion, or utilization of data moving forward with potential OU-8 closure solutions, that's what I want to hear about.

It is my understanding that ARC and SPS are in on-going discussions on O&M management details, so I don't think there's much we can add to that right now.

If you would like to discuss the Plan or your comments on the Plan feel free to call or email me.

Please provide your comments back to me within two weeks, by 02/10/16, and I will provide our combined comments to SPS by 02/12/16.

The rapid turnaround request is essential to SPS implementing the Plan this year, and us receiving the results of the Study this fall, before another wet winter hits us.

Thanks,

Jeryl

Jeryl R. Gardner, P.E., C.E.M.

Abandoned Mine Lands Program Coordinator
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775-687-9484
jgardner@ndep.nv.gov

From: Taurus Massey [mailto:tmassey@singatsepeakservices.com]
Sent: Wednesday, January 27, 2016 11:07 AM
To: Jeryl Gardner
Cc: Rodriguez.Dante@epa.gov; Greg Lovato; Jeff R. Collins; Oman, Jack; Tom Patton; Steve Dischler; Carla Consoli
Subject: Draft Work Plan for Enhanced Evaporation

Dear Jeryl,

Please find the attached *Draft Work Plan for Enhanced Evaporation Pilot Test* for the Anaconda Mine Site. If anyone has trouble with the file size, let me know and I'll send via hightail.

Regards,
Taurus

Taurus Massey

Singatse Peak Services LLC.

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