2004 Consent Decree Update Water-Level Monitoring and Water-Quality Sampling Butte Underground Mines and Berkeley Pit Butte, Montana



MBMG 527

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Executive Summary

The Record of Decision and Consent Decree for the Butte Mine Flooding Operable Unit stipulates that a yearly update of data collected from the Post Remedial Investigation/Feasibility Study and Consent Decree monitoring program be prepared. The report is to incorporate the most recent year's data with the existing data. This report presents data collected during the year 2004, combined with data collected since 1982, when ARCO suspended underground mine dewatering and mining in the Berkeley Pit.

Major new observations and developments discussed in this report are:

- 1. Montana Resources resumption of mining and its impact on water levels from re-activation of selected leach pads.
- 2. Water from the Horseshoe Bend Drainage was diverted to the newly constructed water treatment plant and was not allowed to flow into the Berkeley Pit.
- 3. West Camp pumping activities continue to maintain the ground-water level below the 5,435-foot elevation, stipulated in the 1994 Record of Decision. The volume of water pumped in 2004 was up about 10 percent from 2003 (254 vs. 231 acre-feet). With more water pumped during 2004, the water levels declined between 0.75 ft and 1 ft throughout the system.
- 4. The annual Berkeley Pit model was updated this year, taking into account the diversion of Horseshoe Bend drainage water away from the pit, discharge of sludge from the treatment plant into the pit, and the addition of storm water flow from the Butte Hill. The date projected in the 2002–03 report of mid-2018 was modified to late-2020, <u>a change of 2.5 years</u>, when the 5,410-foot water-level elevation would be reached at the Anselmo Mine.
- Water-quality changes seen in East Camp alluvial wells LP-9 and LP-17 continued. Well LP-9 was sampled during both 2004 sample events and metal concentrations remain very elevated. Well LP-17 continues to show an increase in cadmium, copper and zinc. However, water-quality samples collected from bedrock well E, adjacent to well LP-9, failed to show any increase in metals.

Water-level and water-quality data are presented in the same order and manner as the previous reports for the reader's convenience:

MBMG 376	Duaime	1998
MBMG 410	Duaime, Metesh	2000
MBMG 435	Duaime	2001
MBMG 456	Duaime, Metesh	2002
MBMG 473	Duaime, Metesh	2003
MBMG 489	Duaime, Metesh	2004
MBMG 518	Duaime, Metesh	2005

(MBMG Open-File Reports No. 376, No. 410, No. 435, No. 456, No. 473, No. 489 and No. 518). Hydrographs for <u>selected</u> sites and total and yearly water-level changes for all sites are presented. Water-quality data follow the presentation of water-level data in each section where water-quality data are available, as not all sites were sampled.

The 2004 monitoring program reflected the monitoring and sampling activities outlined in the 2002 Consent Decree. Therefore, some monitoring sites that were part of the early monitoring program have been deleted, while others have been added.

List of Acronyms

AMC	Anaconda Mining Company
EPA	U.S. Environmental Protection Agency
DEQ	Montana Department of Environmental Quality
ROD	Record of Decision
CD	Consent Decree
MBMG	Montana Bureau of Mines and Geology
BMFOU	Butte Mine Flooding Operable Unit
RI/FS	Remedial Investigation/Feasibility Study
BP/ARCO	British Petroleum/Atlantic Richfield Company
MR	Montana Resources
HSB	Horseshoe Bend
HSB Falls	Horseshoe Bend Falls
MCL	Maximum Contaminant Level
SMCL	Secondary Maximum Contaminant Level
SMCL	Secondary Maximum Contaminant Level
CWL	Critical Water Level

2004 Consent Decree Update Water-Level Monitoring and Water-Quality Sampling Butte Underground Mines and Berkeley Pit Butte, Montana

1982-2004

SECTION 1.0 SITE BACKGROUND

Butte, Montana has been the center of underground mining since the 1870s. The handling of ground water became a standard operation as underground mining expanded. Eighty-five mines were developed on the Butte Hill that had depths that reached 1000 feet (ft) below ground surface while 27 of these mines reached depths of 3000 ft or more. The Anaconda Copper Mining Company began interconnecting selected mine levels in an effort to establish a common mine level for draining water to a central pump station as early as 1901. Water was drained to these common levels through a combination of stopes, drifts, or diamond-drill drainage holes. The Anaconda Company continued to operate its mining operations in this manner with the Kelley Mine being the final central pump station. Prior to the 1966-1967 construction of a new pump station at the Kelley Mine, water was drained to the High Ore Mine where water was collected and pumped to the surface (Miller, 1973). The water, which was acidic and contained substantial concentrations of copper and other trace metals, was used in the leach pad and precipitation plant operations (fig. 1-1). When the Anaconda Company announced on April 23, 1982, that they were no longer going to operate their underground mine pump system the Kelley pump station was removing up to 5,000 gallons per minute (gpm) of water. This cessation of pumping allowed the Butte underground mines and ultimately the Berkeley Pit to begin filling with water. Allowing water in the underground mines to rise resulted in a corresponding rise in water levels in the bedrock adjacent to the mines. Other contaminated surface water was diverted into the Berkeley Pit, which also started to fill with metal-laden water. Water levels rose over 1300 ft in the remainder of 1982 and over 800 ft in 1983 in the underground mines.

The full nature of the influence that historic mine dewatering had on the local ground-water system was not well documented, thus a comprehensive water-level and water-quality monitoring network was established. Concerns about the site's long-term environmental impact on ground water and surface water led to the site being listed on the Federal EPA Superfund list. Current monitoring is the result of this listing and settlement agreements.

The Butte Mine Flooding Operable Unit (BMFOU) Remedial Investigation/Feasibility Study (RI/FS) began in 1990 and resulted in the 1994 Record of Decision (ROD) (EPA, 1994). The ROD included provisions for: 1) continued monitoring and sampling of both ground water and surface water, 2) diversion of the Horseshoe Bend Drainage (HSB) water away from the Berkeley Pit (to slow the pit filling rate), 3) incorporation of the HSB water in the Montana Resources (MR) mining operations for treatment, 4) construction of a water treatment plant if changes in mining operations prevent treatment of HSB

water (e.g. mine shutdown), and 5) establishment of a maximum level to which water in the underground mines and Berkeley Pit can rise, before a water treatment plant must be built and in operation.



Figure 1-1. Flume used to carry underground mine water pumped from the High Ore mine pump station to the precipitation plant for leaching of copper from the water.

The U.S. Environmental Protection Agency (EPA) and Montana Department of Environmental Quality (DEQ) began Consent Decree (CD) negotiations with British Petroleum/Atlantic Richfield Company (BP/ARCO) and the Montana Resources Group in the fall of 2001 with an agreement approved by the U.S. District Court in August 2002. The CD addressed all current and future activities relating to the BMFOU and reimbursed EPA and DEQ for past costs associated with the site. Funding for the continuation of the long-term ground-water, surface-water, and Berkeley Pit/Continental Pit monitoring were included in the CD. The monitoring performed by the Montana Resources Group agreed in the CD to be responsible for all costs associated with the design, construction, operation, and maintenance of a water-treatment plant for treating HSB, Berkeley Pit, and other contaminated waters associated with the site. (Refer to the CD and the Explanation of Significant Differences to see the entire scope of activities addressed in the CD and an explanation of differences from items contained in the 1994 ROD.)

Section 1.1 Introduction

The BMFOU 1994 ROD and subsequent 2002 CD specify that an annual review of water levels and water quality shall be performed. The first water-level review was completed in 1998 as a 15-year

evaluation, from the beginning of flooding of the Butte underground mines and Berkeley Pit in 1982 through 1997 (Duaime, 1998); the present study is the eighth such report. Notable changes and a comparison of trends for water levels and water quality are discussed.

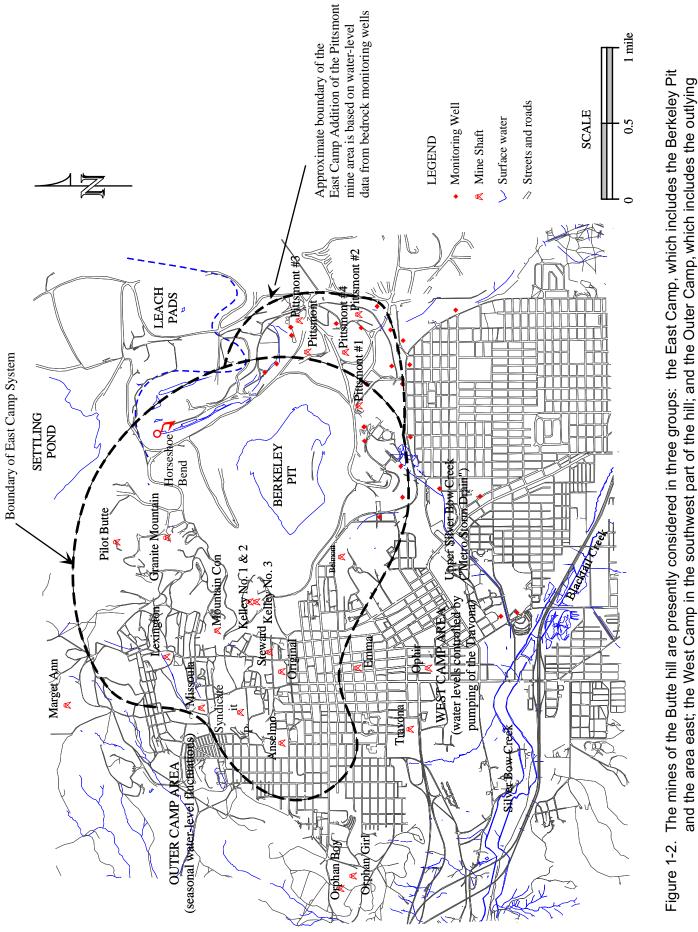
This report does not present an overview of the history of mining on the Butte Hill, nor the Superfund processes that have followed since the EPA designated the flooding underground Butte Mines and Berkeley Pit a Superfund site in 1987. The reader is referred to the Butte Mine Flooding RI/FS, Butte Mine Flooding ROD, Butte Mine Flooding CD, and MBMG Open-File Report No. 376 for greater detail and information about the site.

Monitoring activities continued in 2004 in the East Camp, West Camp and Outer Camp systems (fig. 1-2). The East Camp System includes mines and mine workings draining to the Kelley Mine pump station when mining and dewatering were suspended in 1982. The West Camp System includes mines and underground workings that historically drained to the East Camp from the southwest portion of the Butte mining district, but were hydraulically isolated by the placement of bulkheads within the interconnected mine workings to separate the West Camp from the East Camp. The Outer Camp System consists of the western and northern extent of mine workings that were connected to the East Camp at some time, but were isolated many decades ago, with water levels returning to, or near, premining conditions. By the time water levels in the underground mines reached the elevation of the bottom of the Berkeley Pit in late November 1983, more than 66 percent of the underground workings had already been flooded. More than 90 percent of the underground mine workings have been inundated with water through 2004.

Section 1.2 Notable 2004 Activities and Water-Level and Water-Quality Observations

The six main activities and observations for 2004 are listed below:

- (1) MR's continued mining and milling operations throughout 2004 following their November 2003 resumption of mining.
- (2) MR's reactivation of selected leach pads led to an increase in ground-water levels in the alluvial aquifer near these leach pads.
- (3) The Horseshoe Bend (HSB) water treatment plant was completed and brought on-line during November 2003. Water that was flowing into the Berkeley Pit from the HSB drainage was diverted to the treatment plant. Treated water was then sent to the concentrator for use in the milling process. Sludge from the treatment plant was discharged to the Berkeley Pit for disposal. The reduction in water discharging to the Berkeley Pit slowed the pit water-level rise resulting in a 35-40% reduction in the pit water-level rise.
- (4) East Camp alluvial wells LP-9 and LP-17 continuea to show increases in metal concentrations from previous levels.
- (5) West Camp pumping rates were greater than previous years, which resulted in a moderate water-level decline throughout the West Camp system.



mines.2

Section 1.3 Precipitation Trends

Precipitation during 2004 continued to be less than average; however, it was over an inch more than in 2003. Total precipitation was 10.87 inches compared to the long-term average of 12.76 inches. This is a deficiency of 15 percent and is the sixth consecutive year of below average moisture. Table 1.3.1 contains monthly precipitation statistics from 1982 through 2004, while figure 1-3 shows this information graphically in comparison to the long-term yearly average. Overall precipitation totals, since flooding of the mines began, are very similar to the long-term average (12.62 inches vs. 12.76 inches). Figure 1-4 shows departure from normal precipitation from 1895 through 2004.

	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	ост	NOV	DEC	ANNUAL
	-								-		-	-	AVERAGE
Mean	0.51	0.47	0.80	1.06	1.95	2.16	1.49	1.37	0.98	0.70	0.62	0.54	12.62
Std. Dev.	0.36	0.29	0.40	0.63	0.76	1.26	1.16	0.87	0.67	0.52	0.40	0.40	3.24
Maximum	1.40	1.26	1.84	2.57	3.88	4.62	4.18	3.10	2.50	1.73	1.50	1.99	19.96
Minimum	0.10	0.11	0.18	0.00	0.89	0.50	0.00	0.15	0.07	0.00	0.07	0.11	8.32
Number of y	ears pre	ecipitat	ion gre	ater tha	an mea	n							6.00
Number of y	ears pre	ecipitat	ion les	s than	mean								17.00

Table 1.3.1	Butte NOAA	nrecinitation	etatistics	1982-2004
	Dulle NOAA	precipitation	statistics,	1902-2004.



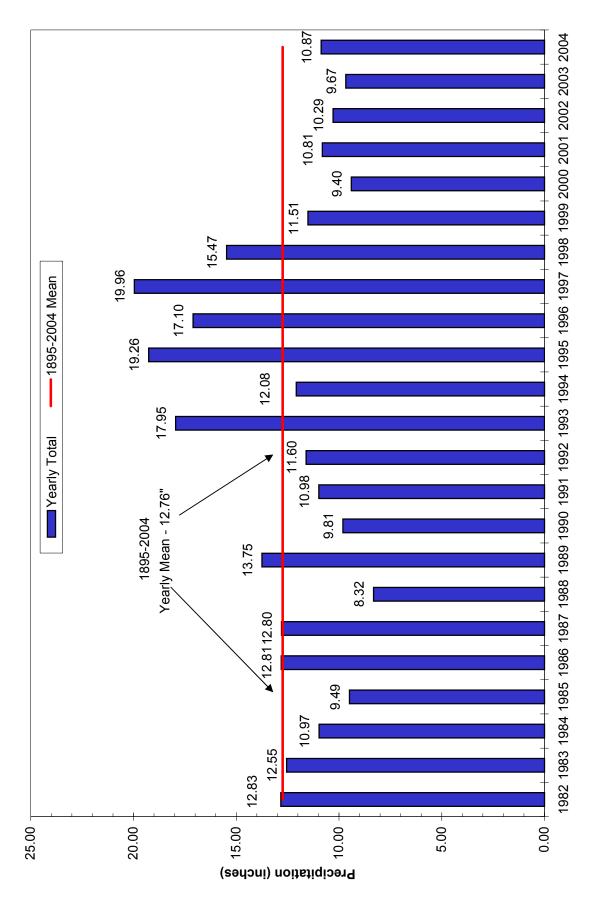
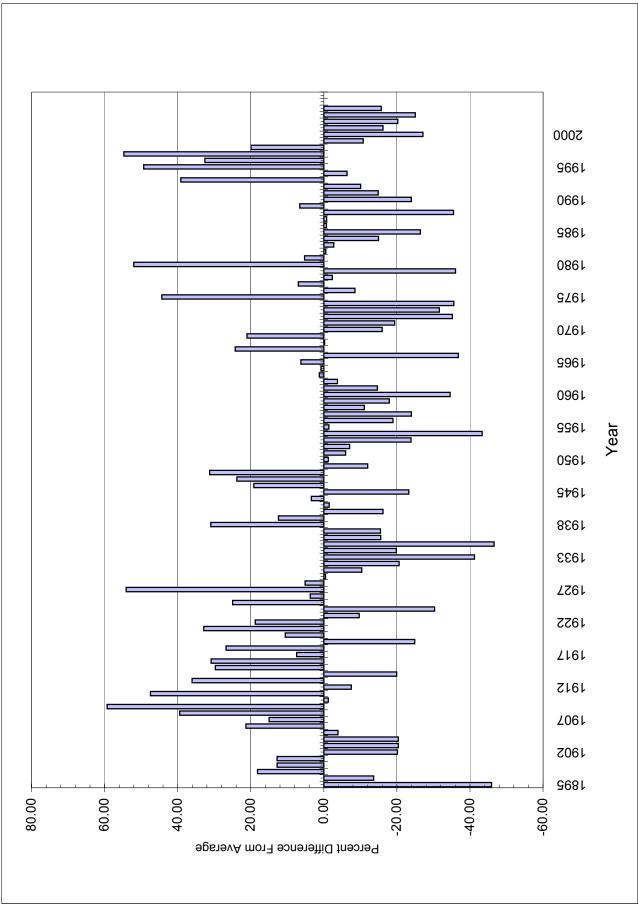


Figure 1-3. Yearly precipitation totals, 1982-2004, showing 1895-2004 yearly mean.





SECTION 2.0 EAST CAMP SYSTEM

The East Camp is comprised of that portion of the bedrock aquifer affected by underground mine dewatering in 1982 and the overlying shallow alluvial aquifer (fig. 2-1). The East Camp Monitoring System consists of the Anselmo, Belmont, Granite Mountain, Kelley, Steward, Lexington and Pilot Butte Mines, and the Berkeley Pit. It also includes the bedrock system adjacent to the East Camp mines and the shallow East Camp alluvial system. The East Camp alluvial system is discussed first, followed by the East Camp bedrock system.

Section 2.1 East Camp Alluvial System

The East Camp alluvial monitoring system consists of a series of different groups of wells. Each group of wells represents sites installed or monitored during different studies that have been incorporated in the BMFOU-CD monitoring program. Water-level changes and monthly precipitation amounts are shown on hydrographs for selected wells. Water-quality results are shown and discussed for the wells sampled. Unlike the water-level monitoring program, water-quality sampling does not occur at every East Camp monitoring well and takes place only once or twice per year.

Water-level conditions and water-quality characteristics vary throughout the alluvial system. Wells within or adjacent to historic mining activities show trends relating to the influence of those activities. Sites outside historic mining areas reflect conditions more typical of the regional hydrogeology.

Section 2.1.1 AMC-Series Wells

The locations of the Anaconda Mining Company (AMC) wells are shown on figure 2-2; table 2.1.1.1 lists the annual water-level changes for these sites.

There was a noticeable change in 2004 water-level trends for a majority of these wells, with wells AMC-5 and AMC-8 exhibiting the greatest change. The water levels rose in three of these wells, with well AMC-10 remaining dry. In last year's report, it was noted that water levels rose in all the AMC wells, with the exception of well AMC-10, which has been dry since its installation in 1983. It was mentioned that the water-level rises were related to the start-up of MR's mining operation; however, the exact relationship between water-level increases and exact start-up activities was not well defined. It did not appear that any one or two activities were responsible for water-level changes, but most likely a combination of several factors. Several of the start-up activities that might have combined to influence water levels were: 1) pumping of water to the Yankee Doodle Tailings Dam to provide a reservoir of make-up water for the concentrator facility; 2) filling with water and pressure testing the concentrator clarifier tanks and pipelines; 3) filling the concentrator Ecology/Emergency Pond with water and 4) increased flow of water in the return water ditch due to dewatering of the Continental Pit.

Well AMC-5 exhibited the greatest water-level increase in 2003 and is located just north of the Emergency Pond. This well also saw the greatest water-level decline in 2004. The water-level trend for 2003–2004 shown on figure 2-3 for this well is very similar to the trend seen in 1986-1987, which coincides with the start-up of mining following ARCO's 1983 suspension of mining. It is apparent that filling the Emergency Pond with make-up water for milling operations has a considerable influence on alluvial water levels in the immediate area. The water level in well AMC-5 did not show any influence from precipitation events in 2004.

-0.89 -0.89 6.97 -1.13	-1.25 3.50 0.13	-1.77 0.97 1.42	DRY DRY DRY	-0.98 0.53 -0.37	-0.73 0.03 -0.42	-1.65 0.37 0.43
-0.89	-1.25	-1.77				
	-		DRY	-0.98	-0.73	-1.65
-1.09						
1 00	-1 92	-3.03	DRY	-0.55	-0.36	-2.3
-2.46	-2.56	-3.88	DRY	-1.77	-1.17	-3.7
-1.56	-2.03	-2.45	DRY	-1.56	-1.09	-1.5
-1.52	0.42	1.15	DRY	0.18	0.09	0.5
1.80	1.47	2.24	DRY	1.20	0.70	2.8
-0.05	0.62	2.14	DRY	0.74	0.69	2.6
0.64	1.01	0.51	DRY	1.23	1.13	0.9
0.64	0.53	0.91	DRY	-0.19	-0.50	0.9
0.40	0.70	0.80	DRY	1.10	1.00	-0.4
0.40	-0.40	0.50	DRY	-0.30	0.00	-0.1
0.00	0.30	0.80	DRY	-0.60	0.30	-0.3
0.20	0.10	0.30	DRY	1.10	0.00	-0.1
-2.30	-0.80	-0.90	DRY	-0.20	-0.10	0.1
0.20	-0.40	0.30	DRY	-0.10	-1.00	0.8
0.10	0.40	1.50	DRY	0.60	0.10	0.0
8.70	3.90	-0.90	DRY	1.90	1.00	-2.1
			DRY		-	-2.8
-4.50	-2.55	-3.75	DRY	-1.80	-1.10	-3.4
-23.75				-		AMC-1
	-4.50 -3.40 8.70 0.10 0.20 -2.30 0.20 0.00 0.40 0.40 0.64 0.64 -0.05 1.80 -1.52 -1.56 -2.46	$\begin{array}{cccccc} -23.75 & -2.30 \\ -4.50 & -2.55 \\ -3.40 & -3.90 \\ 8.70 & 3.90 \\ 0.10 & 0.40 \\ 0.20 & -0.40 \\ -2.30 & -0.80 \\ 0.20 & 0.10 \\ 0.00 & 0.30 \\ 0.40 & -0.40 \\ 0.40 & 0.70 \\ 0.64 & 0.53 \\ 0.64 & 1.01 \\ -0.05 & 0.62 \\ 1.80 & 1.47 \\ -1.52 & 0.42 \\ -1.56 & -2.03 \\ -2.46 & -2.56 \end{array}$	$\begin{array}{cccccccccccccccccccccccccccccccccccc$	-23.75 -2.30 -4.90 DRY -4.50 -2.55 -3.75 DRY -3.40 -3.90 -3.00 DRY 8.70 3.90 -0.90 DRY 0.10 0.40 1.50 DRY -2.30 -0.40 0.30 DRY 0.20 -0.40 0.30 DRY 0.20 0.10 0.30 DRY 0.20 0.10 0.30 DRY 0.20 0.10 0.30 DRY 0.20 0.10 0.30 DRY 0.40 0.50 DRY 0.40 0.70 0.80 DRY 0.40 0.70 0.80 DRY 0.64 0.53 0.91 DRY 0.64 1.01 0.51 DRY -0.05 0.62 2.14 DRY -1.80 1.47 2.24 DRY -1.52 0.42 1.15 DRY -1.56	$\begin{array}{cccccccccccccccccccccccccccccccccccc$	$\begin{array}{c ccccccccccccccccccccccccccccccccccc$

 Table 2.1.1.1
 AMC-series wells, annual water-level changes, in feet

While well AMC-5 is located in the storage yard associated with the Butte Concentrator, wells AMC-6 and AMC-8 are located south of the active mine area and the Butte Concentrator facility (fig. 2-2). Well AMC-12 is located southwest of these wells. Hydrographs for wells AMC-12 (fig. 2-3) and AMC-6 and AMC-8 (fig. 2-4) show the long-term trends in the shallow alluvial ground-water system south of the pit. Monthly precipitation amounts are shown as bars and are plotted on the right-hand y-axis.

Well AMC-6 had only minor water-level increases throughout 2004. These water-level trends are similar in nature to those seen in well AMC-5 and to trends seen in 1986–1987. Because this well is south of the Ecology/Emergency Pond located near the concentrator, it is logical that filling and maintaining a stable water-level in the pond would influence water levels near well AMC-6.

AMC-8 exhibited a continued water-level rise throughout most of 2004. This increase in water level is much different from trends seen for many years, and while being similar to changes seen once again during the 1986-1987 start-up of mining, the magnitude of the water-level changes is much greater. The water-level trend is very similar to that seen in wells AMC-5 and AMC-6, however there is a several month lag time (delay) between the initial rise in water levels. This delay in water-level changes is

related to the increased distance between well AMC-8 and the Concentrator Emergency Pond. There is no apparent relationship to precipitation trends and the increased water levels. However, it is possible that a certain amount of water in the return water ditch seeps into the shallow alluvial system and provides recharge water for this well.

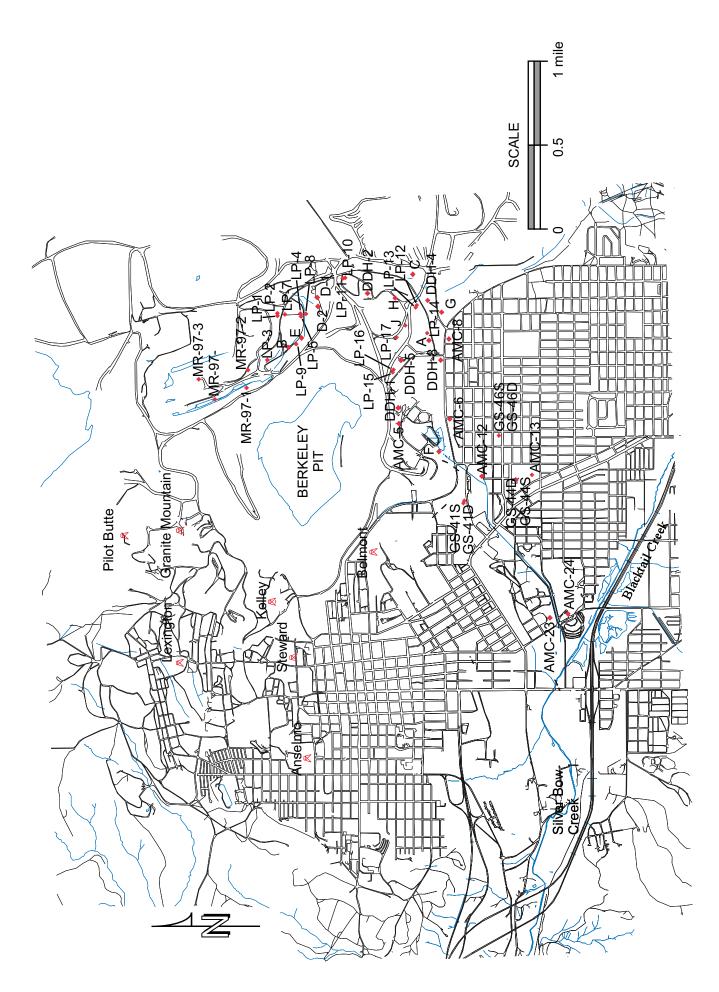


Figure 2-1. East Camp Monitoring Sites.

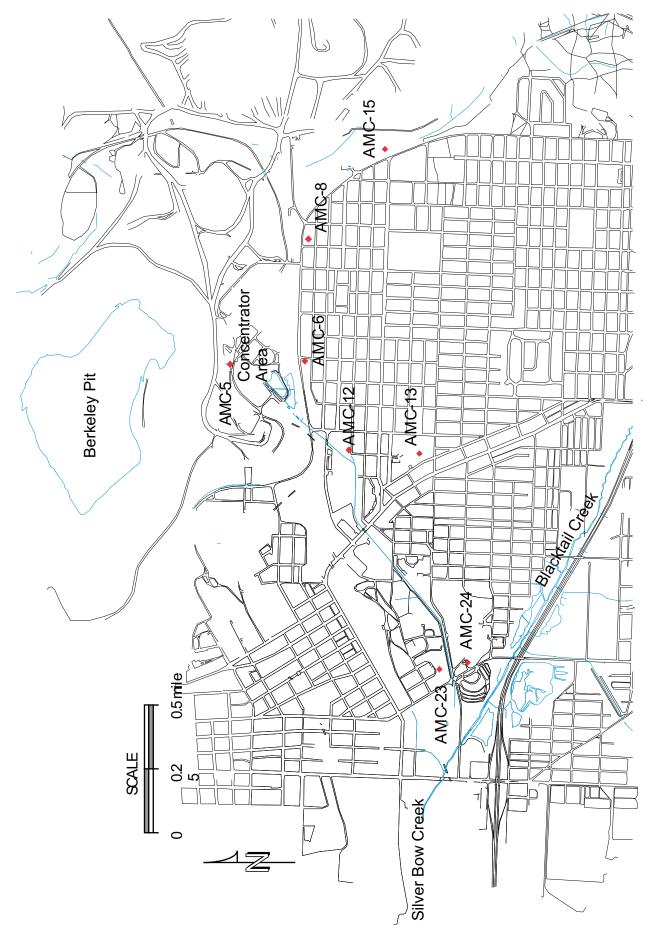


Figure 2-2. AMC well location map.



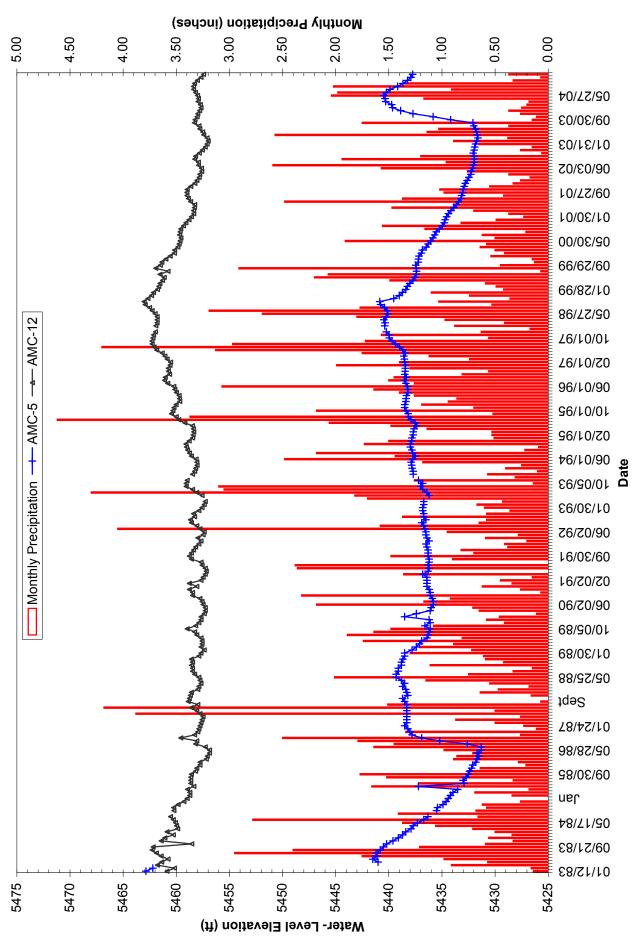


Figure 2-3. Water-level hydrographs for AMC-5 and AMC-12 wells.

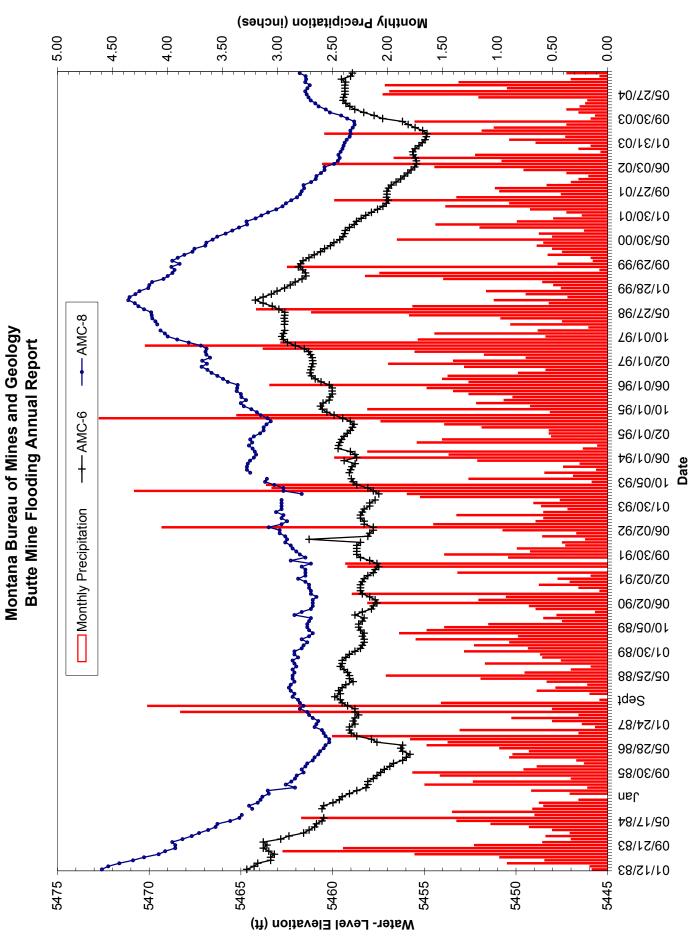


Figure 2-4. Water-level hydrographs for AMC-6 and AMC-8 wells.

Well AMC-12 water-level variations were similar to those of 2001 and 2002, with the overall trend returning downward. The 2004 changes may be related to equilibrium of water levels following MR's resumption of mining or related to construction activities in the nearby Metro Storm Drain (MSD) channel. Water levels increased in the spring with increased precipitation and then declined through the fall (fig. 2-3), a trend similar to the past years.

Well AMC-13 is located on the west side of Clark's Park, south of wells GS-44S and GS-44D. This well's hydrograph shows both a response to precipitation events and possibly lawn watering (fig. 2-5a). Water levels began to rise in the spring and continued throughout the summer, before starting to decline in the fall. This trend is similar to that of prior years.

Well AMC-15 is located on the west side of the Hillcrest waste dump (fig. 2-2) in an area where reclamation has taken place. Water in this well is much deeper (90 feet) compared to the other AMC wells, and the hydrograph reflects this. There were minor seasonal changes in water levels for a number of years. However, the influence of the recent below-normal precipitation is shown by the steep decline in water levels beginning in late 1999 (fig. 2-5b), when this well did not show any significant response to precipitation. The water-level decline began leveling off in mid-2003, then rose almost one-half foot from September through December 2003. The water level continued to rise (0.43 ft) throughout 2004. This recent trend does not show any response to precipitation patterns. However, the cause of the water-level increases is uncertain due to this well's location. It is a considerable distance away from any obvious activities relating to the resumption of mining that might be responsible for an increase in water levels. The continued water-level rise during the fall of 2004 is in contrast to a majority of the other AMC wells.

Montana Bureau of Mines and Geology **Butte Mine Flooding Annual Report**

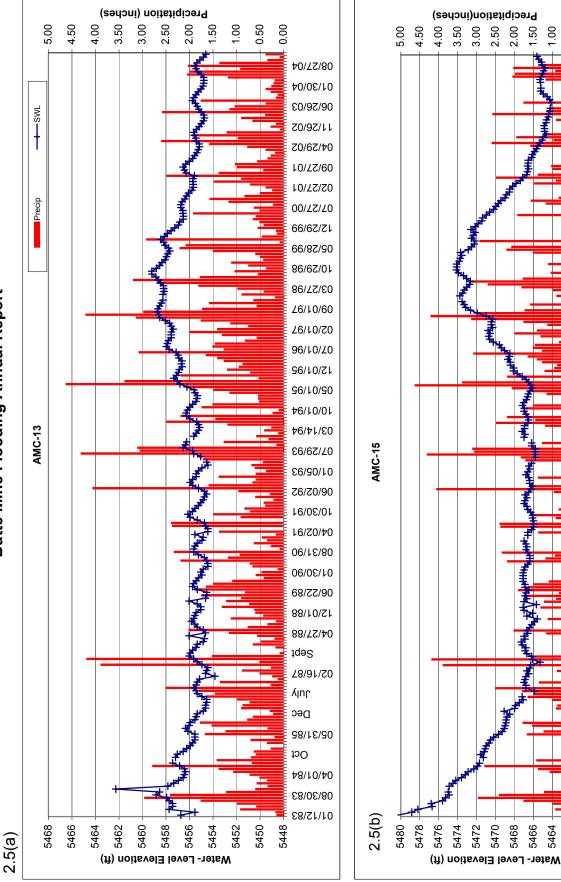


Figure 2-5. Water-level hydrographs for AMC-13 (a), and AMC-15 (b) wells.

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02/58/66

10/29/98

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26/10/20

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01/02/63

26/20/90

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16/20/40

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06/02/10

06/22/89

12/01/88

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78/31/20

02/31/82

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Section 2.1.1.1 AMC-Series Wells Water Quality

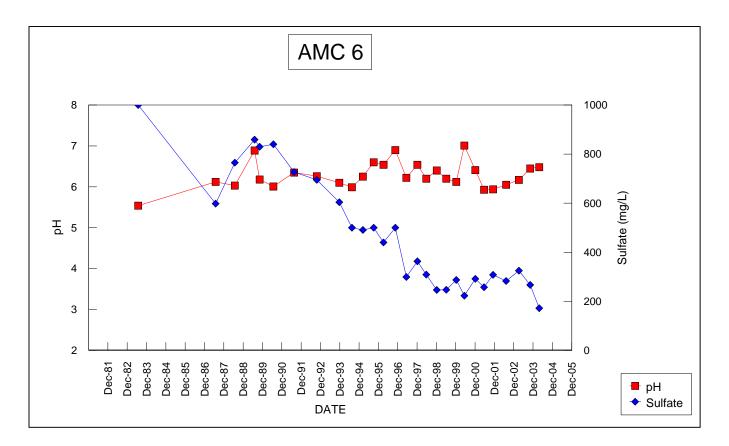
Concentration trends of the 2004 data collected from the AMC-series wells are summarized in Table 2.1.1.1.1. Well AMC-5, just south of the Berkeley Pit, has exceeded MCLs and SMCLs throughout the period of record. The concentrations of most of the dissolved metals have shown a slight downward trend; however, the concentrations of arsenic, cadmium, and sulfate have been increasing the last several years.

AMC 6 shows a continued, consistent trend of decreasing concentrations of nearly all dissolved constituents. At 18 μ g/L, cadmium is the only constituent whose concentration exceeds a drinking water standard. The concentration of sulfate decreased from about 270 to less than 175 mg/L in the 2003 - 2004 period (fig. 2-6). Data for AMC-8 is questionable with respect to the concentration of cadmium. The analysis of a sample collected on 11/7/03 indicates a concentration of 3.9 μ g/L, similar to concentrations in recent years. The analysis of a sample collected on 4/18/04 indicates a concentration of 21.3 μ g/L, roughly an order of magnitude greater than the previous years. The concentration of other dissolved constituents in the 2004 sample is consistent with previous samples. As in the past, the concentration of other constituents has increased, but not at such a high rate. With the exception of cadmium, there was little change in the trend of concentrations from 2003 to 2004. Sulfate, for example, increased from 466 to 472 mg/L, a similar rate as previous years (fig. 2-6).

Well Name	Exceedances	Concentration Trend	Remarks
AMC-5	Y	Variable	Sulfate exhibits upward trend
AMC-6	Y	Downward	Downward trend continues
AMC-8	Y	Variable	Increasing sulfate
AMC-12	Y	Variable	No significant trends
AMC-13	Y	Variable	Not sampled
AMC-15	Y	Variable	Not sampled

Table 2.1.1.1.1Exceedances and trends for AMC-series wells, 2004.

AMC-15 was not sampled in 2004. Zinc concentrations in the sampled AMC-series wells ranged from about 58,000 μ g/L in AMC-5, near the Berkeley Pit, to about 62 μ g/L in AMC-15 (as measured in 2003) on the east margin of the valley. As in the recent past, no strong trends are apparent in any wells; most show a slight downward trend over the period of record. Copper concentrations range from 13,360 μ g/L in AMC-5 to about 2.4 μ g/L in AMC-15.



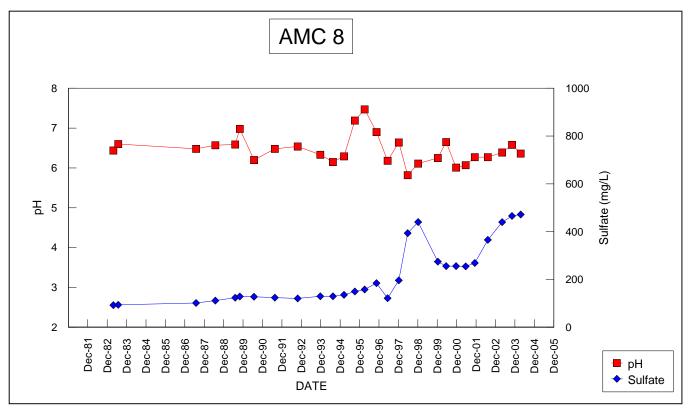


Figure 2-6. Sulfate concentrations for AMC-6 and AMC-8.

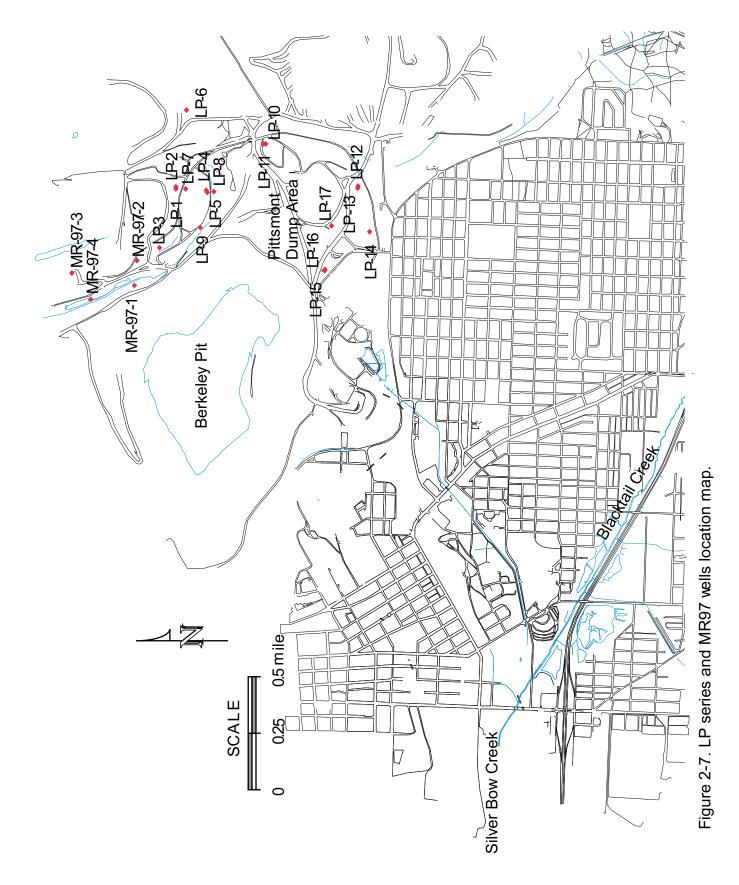
Section 2.1.2 LP-Series Wells

The locations of the LP-series monitoring wells are shown on figure 2-7. As discussed in Duaime and others (1998), these wells were installed in 1991 as part of the BMFOU RI/FS study. Water-level monitoring and sampling of the LP-series wells continued throughout 2004. Table 2.1.2.1 presents a summary of annual water-level changes for these 17 sites. Well LP-11 was plugged and abandoned in 2001; well LP-03 was plugged and abandoned in 2002 to make room for the HSB water-treatment plant. Well LP-06, which had been dry for over three years, had a water-level rise of more than 3 ft during 2004; therefore, only well LP-07 remains dry. Water levels declined in three wells during 2004, compared to eight wells during 2003. Water levels rose in the remaining 11 wells during 2004, which is a considerable change in trend. Wells north of the Pittsmont Waste Dump saw the greatest rise, with rises exceeding 13 ft and 18 ft in wells LP-04 and LP-08, respectively. However, since monitoring began, water levels have experienced a net decline in all 17 of these wells, ranging from 0.55 ft to 31.5 ft in wells LP-06 and LP-09, respectively.

The rise in water levels to the north of the Pittsmont Waste Dump is a substantial change from trends seen in previous years. Water levels had declined in a majority of the north wells since 1992. This had been especially true since the deactivation of the leach pads in 1999. However, as part of its resumption of mining, MR began leaching operations on a limited scale. The wells with the greatest water-level rise (LP-04 and LP-08) are located south and down gradient of the leach pads where the leaching took place. Figures 2-8 and 2-9 show water levels over time for five of the LP series wells, which are located south of the re-activated leach pad. Wells LP-01 and LP-02 are located near the base of several leach pads and are screened in two different intervals. Well LP-01, which had a water-level decline for 2004, is completed at a deeper depth, which might account for the overall water-level decline. However, as can been seen on figure 2-8, water levels increased slightly the last two months of 2004 in this well. The delay in waterlevel changes is most likely related to the lag-time, or the time necessary for the water applied as part of the leaching operation to move through the leach pads and underlying alluvial material to reach the screened interval for this well, which is at a depth of 177-197 ft below ground surface. This is 25 ft deeper than the screen interval of well LP-02. Water levels in wells LP-01 and LP-02 show a greater response to operational practices associated with the leach pads than to precipitation events. This is consistent with interpretations of water-level responses made following MR's 1999 deactivation of the leach pads.

Figure 2-9 shows water levels over time for wells LP-04, LP-07, and LP-08, which are located south of wells LP-01 and LP-02 and north of the Pittsmont Waste Dump (fig. 2-7). These wells are completed at different depths also. Well LP-04 is screened from 125-145 ft below ground surface, while well LP-07 is screened from 90-95 ft below ground surface, and well LP-08 is screened 81-96 ft below ground surface. Based upon these well-completion depths, wells LP-07 and LP-08 would be considered to be completed in the upper portion of the alluvial aquifer, while well LP-04 would be considered to be completed in the deeper portion of the alluvial aquifer.

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Year	LP-01	LP-02	LP-03	LP-04	LP-05	LP-06	LP-07	LP-08	LP-09
1991	1.23	-0.91	-2.02	1.38	4.35	-1.46	-	-	-0.70
1992	-1.14	-1.56	-0.66	-1.75	-1.08	0.80	-3.79	-3.78	-7.16
1993	-0.91	-1.69	1.84	-1.69	-2.42	-0.53	-3.06	-4.83	-2.24
1994	-0.53	-0.80	-1.61	-0.57	-1.42	-2.28	-1.03	-2.11	-2.90
1995	-0.08	-0.19	-1.74	2.94	0.34	0.47	4.91	4.30	3.35
1996	-2.05	-2.00	-0.73	-1.28	-3.40	2.01	-4.30	-1.14	-1.49
1997	-1.58	-1.86	-0.09	-1.73	-3.32	-1.37	-2.24	-2.63	-0.29
1998	0.12	0.23	-2.03	1.01	-0.03	-0.58	2.44	0.99	1.60
1999	-2.24	-1.76	-7.44	-2.64	-3.15	-1.65	-6.47	-3.52	-3.77
2000	-7.55	-7.16	-5.45	-10.83	-7.87	-0.20	-3.10	-14.03	-13.28
2001	-5.13	-4.73	-9.51	-8.88	-5.47	Dry	Dry	-12.10	-3.04
2002	-5.21	-3.91	-2.01*	-6.03	-4.86	Dry	Dry	-4.11	-3.46
2003	-2.29	1.60	P&A*	-1.75	-2.00	Dry	Dry	-0.04	-1.15
2004	-0.65	0.46	P&A*	13.06	3.85	3.24	Dry	18.13	2.96
Net									
Change	-28.01	-24.28	-31.45	-18.16	-26.48	-0.55	-16.64	-24.87	-31.57
Year	LP-10	LP-11	LP-12	LP-13	LP-14	LP-15	LP-16	LP-17	
Year 1991	LP-10 -	LP-11 -	LP-12 -	LP-13	LP-14 -	LP-15 -	LP-16 -	LP-17 -	
1991	-	-	-	-	-	-	-	LP-17 - -	
1991 1992	- -0.50	- -1.83	- 0.31	- -0.07	- 0.70	- 0.54	- 0.89	LP-17 - -	
1991	-	- -1.83 -2.78	- 0.31 1.42	-	- 0.70 1.18	- 0.54 1.62	- 0.89 1.83	LP-17 - - -	
1991 1992 1993 1994	-0.50 -0.83 -2.14	- -1.83 -2.78 1.65	- 0.31 1.42 -1.41	- -0.07 1.11 -1.47	- 0.70 1.18 -0.09	- 0.54 1.62 0.26	- 0.89 1.83 -1.16	- - -	
1991 1992 1993 1994 1995	- -0.50 -0.83 -2.14 -0.57	- -1.83 -2.78 1.65 -0.23	- 0.31 1.42 -1.41 -0.16	- -0.07 1.11 -1.47 0.43	- 0.70 1.18 -0.09 0.18	- 0.54 1.62 0.26 1.89	- 0.89 1.83 -1.16 3.57	- - - 3.10	
1991 1992 1993 1994	-0.50 -0.83 -2.14	- -1.83 -2.78 1.65	- 0.31 1.42 -1.41	- -0.07 1.11 -1.47	- 0.70 1.18 -0.09	- 0.54 1.62 0.26	- 0.89 1.83 -1.16	- - -	
1991 1992 1993 1994 1995 1996	- -0.50 -0.83 -2.14 -0.57 1.20	- -1.83 -2.78 1.65 -0.23 0.23	- 0.31 1.42 -1.41 -0.16 1.87	- -0.07 1.11 -1.47 0.43 1.74	- 0.70 1.18 -0.09 0.18 2.07	0.54 1.62 0.26 1.89 1.79	- 0.89 1.83 -1.16 3.57 1.77	- - 3.10 1.66	
1991 1992 1993 1994 1995 1996 1997	- -0.50 -0.83 -2.14 -0.57 1.20 0.23	-1.83 -2.78 1.65 -0.23 0.23 -0.09	- 0.31 1.42 -1.41 -0.16 1.87 2.42	-0.07 1.11 -1.47 0.43 1.74 2.24	0.70 1.18 -0.09 0.18 2.07 2.64	- 0.54 1.62 0.26 1.89 1.79 1.99	0.89 1.83 -1.16 3.57 1.77 1.77	- - 3.10 1.66 2.32	
1991 1992 1993 1994 1995 1996 1997 1998	-0.50 -0.83 -2.14 -0.57 1.20 0.23 0.92	-1.83 -2.78 1.65 -0.23 0.23 -0.09 0.07	- 0.31 1.42 -1.41 -0.16 1.87 2.42 1.00	-0.07 1.11 -1.47 0.43 1.74 2.24 -0.62	- 0.70 1.18 -0.09 0.18 2.07 2.64 0.39	- 0.54 1.62 0.26 1.89 1.79 1.99 -7.90	- 0.89 1.83 -1.16 3.57 1.77 1.77 -9.69	- - 3.10 1.66 2.32 -2.41	
1991 1992 1993 1994 1995 1996 1997 1998 1999	- -0.50 -0.83 -2.14 -0.57 1.20 0.23 0.92 -2.05	- -1.83 -2.78 1.65 -0.23 0.23 -0.09 0.07 -2.12	- 0.31 1.42 -1.41 -0.16 1.87 2.42 1.00 -2.94	- -0.07 1.11 -1.47 0.43 1.74 2.24 -0.62 -2.36	- 0.70 1.18 -0.09 0.18 2.07 2.64 0.39 -2.73	- 0.54 1.62 0.26 1.89 1.79 1.99 -7.90 -4.39	- 0.89 1.83 -1.16 3.57 1.77 1.77 -9.69 -4.60	- - - 3.10 1.66 2.32 -2.41 -3.95	
1991 1992 1993 1994 1995 1996 1997 1998 1999 2000	- -0.50 -0.83 -2.14 -0.57 1.20 0.23 0.92 -2.05 -1.37	-1.83 -2.78 1.65 -0.23 0.23 -0.09 0.07 -2.12 -0.28	- 0.31 1.42 -1.41 -0.16 1.87 2.42 1.00 -2.94 -3.60	- -0.07 1.11 -1.47 0.43 1.74 2.24 -0.62 -2.36 -2.93	- 0.70 1.18 -0.09 0.18 2.07 2.64 0.39 -2.73 -3.64	- 0.54 1.62 0.26 1.89 1.79 1.99 -7.90 -4.39 -1.73	- 0.89 1.83 -1.16 3.57 1.77 1.77 -9.69 -4.60 -2.18	- 3.10 1.66 2.32 -2.41 -3.95 -2.86	
1991 1992 1993 1994 1995 1996 1997 1998 1999 2000 2001	- -0.50 -0.83 -2.14 -0.57 1.20 0.23 0.92 -2.05 -1.37 0.51	-1.83 -2.78 1.65 -0.23 0.23 -0.09 0.07 -2.12 -0.28 P&A*	- 0.31 1.42 -1.41 -0.16 1.87 2.42 1.00 -2.94 -3.60 -1.16	-0.07 1.11 -1.47 0.43 1.74 2.24 -0.62 -2.36 -2.93 -1.30	- 0.70 1.18 -0.09 0.18 2.07 2.64 0.39 -2.73 -3.64 -2.31	- 0.54 1.62 0.26 1.89 1.79 1.99 -7.90 -4.39 -1.73 -0.72	- 0.89 1.83 -1.16 3.57 1.77 1.77 -9.69 -4.60 -2.18 -1.18	- 3.10 1.66 2.32 -2.41 -3.95 -2.86 -1.50	
1991 1992 1993 1994 1995 1996 1997 1998 1999 2000 2001 2001 2002	- -0.50 -0.83 -2.14 -0.57 1.20 0.23 0.92 -2.05 -1.37 0.51 -0.15	-1.83 -2.78 1.65 -0.23 0.23 -0.09 0.07 -2.12 -0.28 P&A* P&A*	- 0.31 1.42 -1.41 -0.16 1.87 2.42 1.00 -2.94 -3.60 -1.16 -1.83	-0.07 1.11 -1.47 0.43 1.74 2.24 -0.62 -2.36 -2.93 -1.30 -1.21	- 0.70 1.18 -0.09 0.18 2.07 2.64 0.39 -2.73 -3.64 -2.31 -1.65	- 0.54 1.62 0.26 1.89 1.79 1.99 -7.90 -4.39 -1.73 -0.72 -0.68	- 0.89 1.83 -1.16 3.57 1.77 1.77 -9.69 -4.60 -2.18 -1.18 -0.86	- 3.10 1.66 2.32 -2.41 -3.95 -2.86 -1.50 -0.67	
1991 1992 1993 1994 1995 1996 1997 1998 1999 2000 2001 2002 2003	-0.50 -0.83 -2.14 -0.57 1.20 0.23 0.92 -2.05 -1.37 0.51 -0.15 -2.75	- -1.83 -2.78 1.65 -0.23 0.23 -0.09 0.07 -2.12 -0.28 P&A* P&A* P&A*	- 0.31 1.42 -1.41 -0.16 1.87 2.42 1.00 -2.94 -3.60 -1.16 -1.83 -1.74	-0.07 1.11 -1.47 0.43 1.74 2.24 -0.62 -2.36 -2.93 -1.30 -1.21 -0.26	- 0.70 1.18 -0.09 0.18 2.07 2.64 0.39 -2.73 -3.64 -2.31 -1.65 0.46	- 0.54 1.62 0.26 1.89 1.79 1.99 -7.90 -4.39 -1.73 -0.72 -0.68 1.08	- 0.89 1.83 -1.16 3.57 1.77 1.77 -9.69 -4.60 -2.18 -1.18 -0.86 0.89	- 3.10 1.66 2.32 -2.41 -3.95 -2.86 -1.50 -0.67 0.09	

 Table 2.1.2.1
 Annual water-level change in LP-series wells

(*) Plugged and abandoned

The water-level trends are similar for wells LP-04, LP-07, and LP-08. It is interesting to note that while well LP-08 was dry for a period from mid-2003 through mid-2004, the water-level trend did not vary from that shown for well LP-04 once the water level rose back above the screen interval. It is apparent that the control on water levels is the same on both of these wells and the operation or lack of operation of the leach pads; whichever the case may be, has a much greater influence on water levels than precipitation. Well LP-07 has remained dry since the later part of 2000.

Wells LP-14, LP-15, and LP-16 are located southwest of the Pittsmont Dump (fig. 2-7). A consistent increase in water levels occurred in these wells following their installation in 1992, until the Berkeley Pit landslide of 1998 (fig. 2-10). Since that landslide, water levels had declined in a similar manner in all

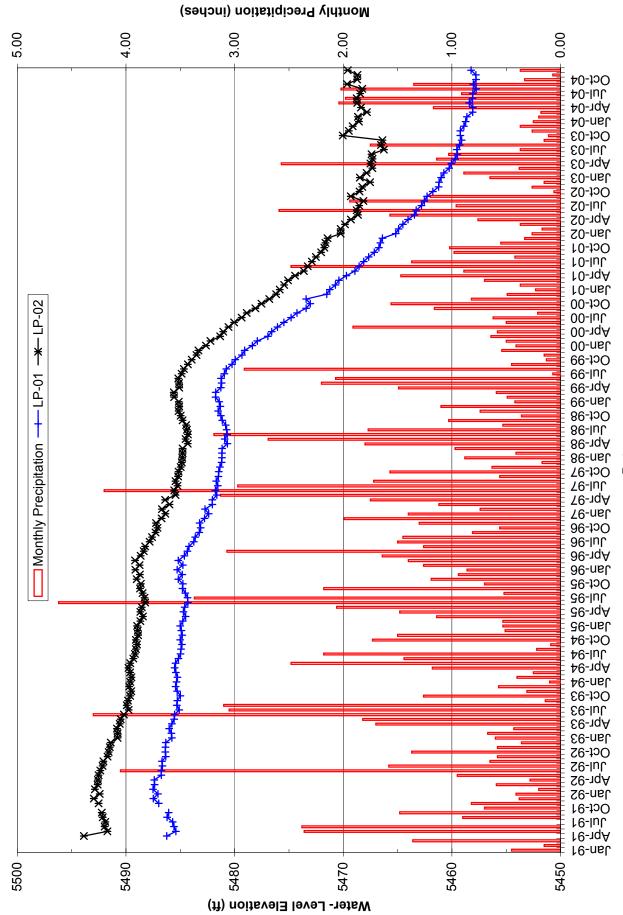
three of these wells until beginning to rise in September 2003 and continuing through May 2004. Wells LP-15 and LP-16 are located near one another and were completed as a nested pair, with well LP-15 screened from a depth of 215-235 ft below ground surface and well LP-16 screened from 100-120 ft below ground surface. Water-level trends are similar in these wells regardless of completion depth. However, water levels had a net increase in the shallow well, LP-16, for 2004, while well LP-15 had a slight water-level decline for the year. Neither of these wells shows any response to precipitation events.

Well LP-14 is located south of wells LP-15 and LP-16, but its overall water-level trend is similar to that seen in wells LP-15 and LP-16. There were a few more fluctuations in this well during 2004 which might be related to precipitation events.

The general observation made in the last several yearly reports, that wells between the leach pads and Pittsmont Waste Dump were affected by leach-pad operations, including the 1999 leach-pad dewatering and historic-mine dewatering, remains true. Water levels in these LP-series wells were controlled by the operation and subsequent dewatering of the leach pads, operation of the Yankee Doodle Tailings Dam, by the depressed water levels in the Berkeley Pit, or a combination of all three. The water-level response seen in wells adjacent and down gradient of limited leaching operations during 2004 clearly demonstrates the relationship of water-level changes and the leach pad operations. While water levels increased in a number of these LP-series wells in 2004, all these wells have a net decline in water level since their installation. The influence of precipitation is minimal, at most, on any of these wells.

An alluvial aquifer potentiometric map (fig. 2-11) constructed using December 2004 water levels shows how alluvial waters are flowing towards the Berkeley Pit from the north, east and south. Water contaminated by historic mining activities (Metesh, 2000) is flowing towards and into the Berkeley Pit, ensuring that there is no outward migration of contaminated water into the alluvial aquifer.

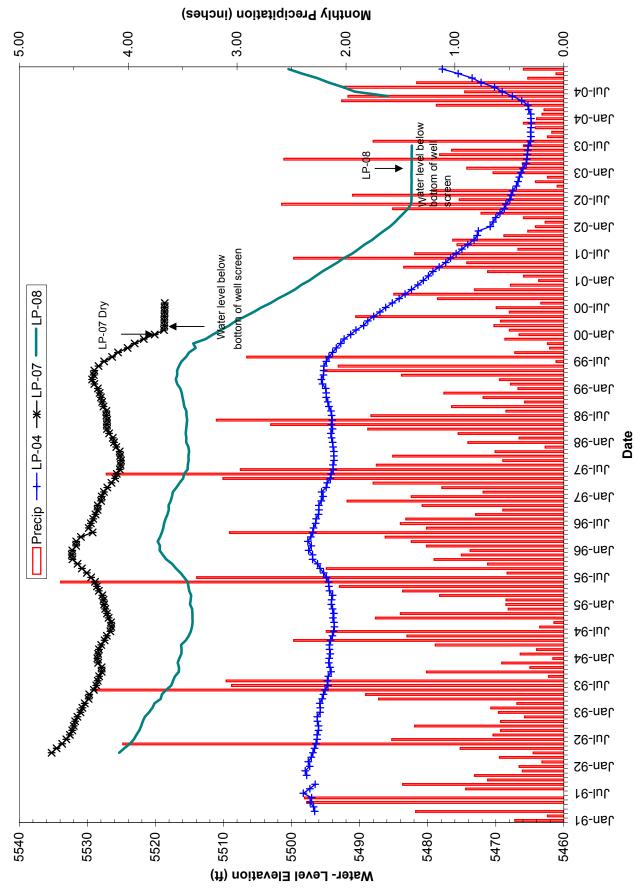




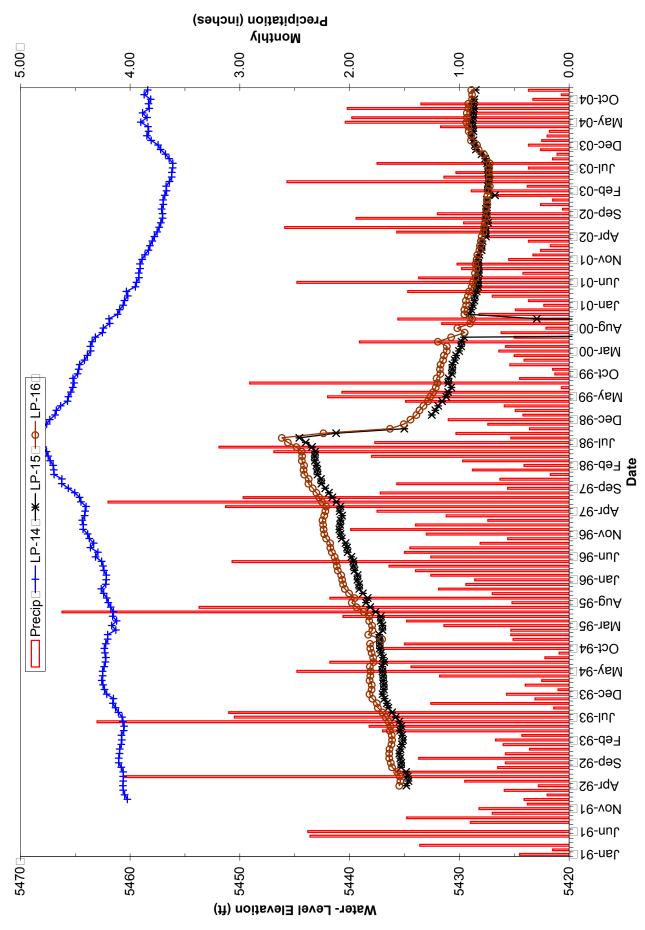
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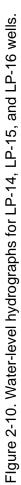
Figure 2-8. Water-level hydrographs for LP-01 and LP-02 wells.

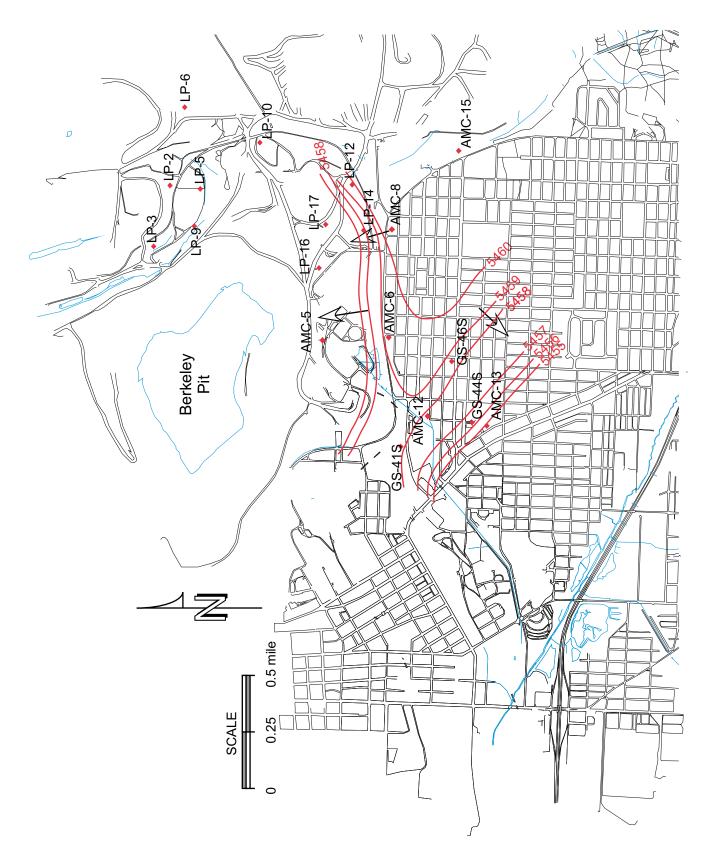














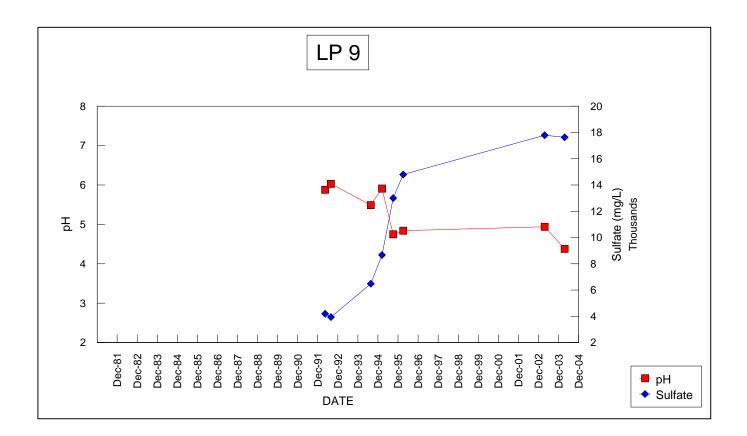
Section 2.1.2.1 LP-Series Wells Water Quality

Current water-quality monitoring of the LP-series wells is restricted to those wells east and south of the Pittsmont Dump (fig. 2-7) with one exception: well LP-09, which is just south of the leach pad area. Water-quality trends in 2004 showed some changes in several wells; these are summarized in Table 2.1.2.1.1. Well LP-9 was sampled in August of 1992 and then not sampled until April of 2003; a comparison of the data indicates large increases in the concentration of most dissolved constituents starting in 2003. Data collected in 2004 show that the increase is sustained, if not greater. The concentration of aluminum increased from <100 in 2002 to 50,000 μ g/L in 2003 and then to 102,000 in 2004; arsenic increased from 4.4 to 43 and then remained about 42 μ g/L; cadmium increased from 510 in 2002 to 14,600 in 2003 and to 19,367 μ g/L in 2004; and zinc increased from 165,000 in 2002 to 1,870,000 in 2003 and to 2,194,000 μ g/L in 2004. In general, the concentrations of dissolved metals increased by nearly an order of magnitude and approach those values seen in the pregnant solution of the up-gradient leach pads. The trend that first appeared in the 2003 data certainly continued in 2004.

The trend of water quality in other LP-series wells generally remained the same in 2004 as in recent years. A summary of exceedances and trends is presented in table 2.1.2.1.1.

Well Name	Exceedances	Concentration	Remarks
	(1 or more)	Trend	
LP-9	Y	Upward	Large increases since 1992
LP-10	Ν	None	No significant changes in 2004
LP-12	Y	None	No significant changes in 2004
LP-13	Y	None	No significant changes in 2004
LP-14	Y	Variable	Slight increase in sulfate continues
LP-15	Y	None	Net change is small for most analytes
LP-16	Y	Variable	Downward sulfate trend continues
LP-17	Y	upward	Slight upward trend continues

 Table 2.1.2.1.1
 Exceedances and trends for LP-series wells, 2004



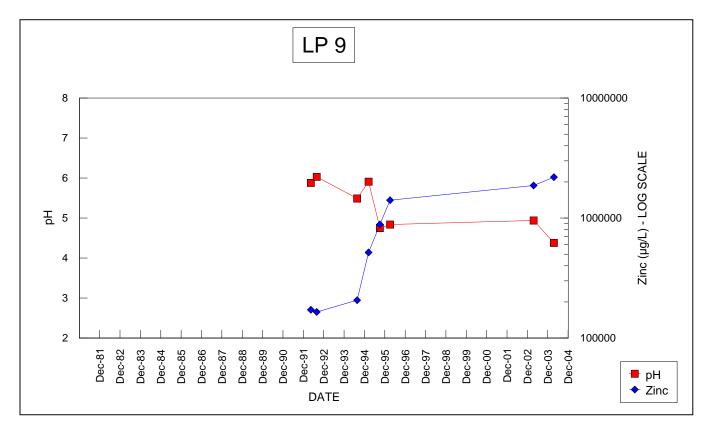


Figure 2-12. Sulfate and zinc concentrations for LP-9.

Section 2.1.3 Precipitation Plant Area Wells

Wells MR97-1, MR97-2, MR97-3, and MR97-4 (fig. 2-7) are adjacent to various structures (drainage ditches, holding ponds) associated with the leach pads and precipitation plant. Table 2.1.3.1 lists annual and net water-level changes for these wells. Water-level changes appear to correspond to flow in these ditches and water levels in ponds.

Year	MR97-1	MR97-2	MR97-3	MR97-4
1997	-0.25	-0.84	-0.40	0.34
1998	1.07	-1.04	-0.67	2.20
1999	-0.27	-4.40	-3.91	0.02
2000	-0.20	-0.89	-2.88	-0.03
2001	6.17	-1.32	-0.29	0.78
2002	-5.88	-1.02	-0.47	1.60
2003	7.43	-0.70	-1.29	-2.45
2004	-10.01	-0.08	-4.28	1.86
Net				
Change	-1.94	-10.29	-14.19	4.33

 Table 2.1.3.1
 Annual water-level changes in MR97-series wells.

Water levels in well MR97-1 have shown the greatest degree of variation (fig. 2-13) due to the various changes in mining operations. Water levels increased when MR began to discharge water from their Berkeley Pit copper recovery project (Spring 1999) into the pit. These variations are characterized by an initial <u>increase</u> in water levels followed by a gradual <u>decrease</u> before leveling off. The channel that carried water back to the pit after the removal of copper is adjacent to well MR97-1. This channel had been unused since April 1996, when HSB drainage water was captured and prevented from flowing into the pit. Water-level increases were seen again following MR's summer 2000 suspension of mining. Water from the HSB drainage that had been pumped to the Yankee Doodle Tailings Dam since April 1996 was allowed to flow into the pit following the June 2000 mine shut-down. What is somewhat surprising is the HSB discharge water used the same drainage channel the discharge water the pit copper recovery project had been using and the flow of water was only about one-third. If anything, with the decrease of flow in the channel, less water would be available for ground-water recharge and water levels would either stabilize or drop. Instead, they rose before gradually declining over the next year.

Similar variations were observed in well MR97-1 during July 2001 and again in 2002, when a weir was installed (2001) and then relocated (2002) in the channel. The weir that was installed in 2001 was relocated upstream to the outlet of what was historically referred to in MR's precipitation plant operations as Pond 4. The weir was relocated as part of infrastructure changes relating to the HSB water treatment plant construction. The area occupied by Pond 4 was excavated and enlarged, then lined with lime rock during construction activities. The weir's relocation resulted in a drop in water levels in well MR97-1, because the weir and the accompanying impounded water were moved upgradient of this well. Water

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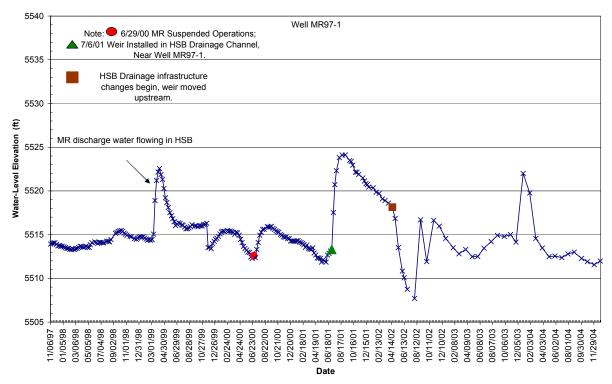


Figure 2-13. Water-level hydrographs for well MR97-1.

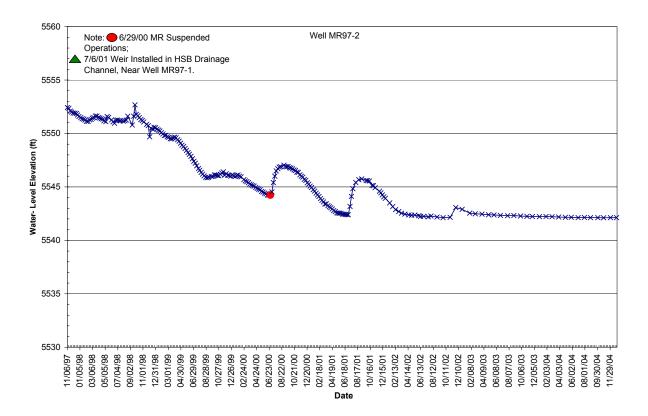


Figure 2-14 . Water-level hydrographs for well MR97-2.

levels showed some minor fluctuations during early 2003, before rising several feet and then leveling off, until a substantial rise during December 2003. The December rise coincides with the resumption of MR's copper recovery project and the corresponding flow of discharge water in a drainage ditch near well MR97-1. Water levels subsequently declined the first part of 2004 before leveling off for most of the remainder of 2004.

Wells MR97-2 and MR97-3 are adjacent to historic collection ditches associated with the leach pads. Water-level changes were apparent in these two wells during 1999-2000 when MR made operational changes in leaching operations. As a result, the amount and level of water in collection ditches became less and were reflected in a drop of water levels in wells MR97-2 and MR97-3 (fig. 2-14 and 2-15).

Water-level increases were also seen in wells MR97-2, MR97-3, and MR97-4 following MR's suspension of mining (fig. 2-14, 2-15, and 2-16). The response in water levels in well MR97-2, figure 2-14, was very similar to that seen in well MR97-1 (fig. 2-12). A similar increase was seen in well MR97-2 following the 2001 weir installation. Water levels were stable at this site during 2003-2004 and did not show the same fluctuations as noted in well MR97-1.

The water level in well MR97-3 showed only a minor response to the 2001 and 2002 construction activities. However, water levels rose the first part of 2003, before leveling off for the next 5 to 6 months and falling the last several months of the year (fig. 2-15). With the exception of a brief period early in 2004, water levels continued to drop in this well. This MR-series well is the farthest away from the HSB drainage channel and appears to be the least responsive to operational changes and flows in the discharge channel.

Water-level changes during 2003 in well MR97-4, figure 2-16, were similar to those seen in well MR97-3, except the decline in water levels began earlier in 2003 and were greater. Since this well is closer to the precipitation plant facilities and HSB ponds and drainage ditches, it is possible that changes in operational flows in this area are responsible for the water-level declines observed the later part of 2003. Changes would be more pronounced in this well than in well MR97-3. The water-level increase seen during early 2004 possibly relates to water flowing into holding ponds associated with the precipitation plant as these operations were brought back on-line with MR's fall 2003 start- up of mining. The fairly consistent water level the remainder of 2004 would indicate the water level in these ponds has remained consistent.

Water levels have declined more than 10 ft in the two wells (MR97-2 and MR97-3) nearest the leach pads and ancillary facilities since their installation in 1997 (table 2.1.3.1), while having a decline just less than 2 ft in well MR97-1. Only well MR97-4 has a net water-level increase; this well is nearest the precipitation plant and its ancillary facilities. It appears there is a direct influence on the shallow alluvial aquifer in this area by mining operations. Changes in mine operations (i.e., precipitation plant and leach pad) affect ground-water recharge in this area. Other changes, such as the weir installation and relocation, have affected ground-water levels in the area in the past.

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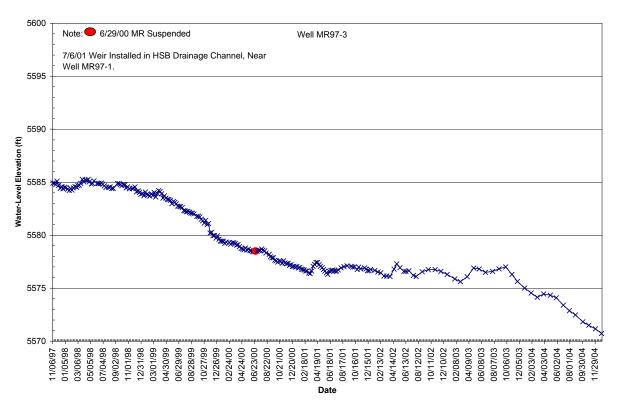


Figure 2-15. Water-level hydrographs for well MR97-3.

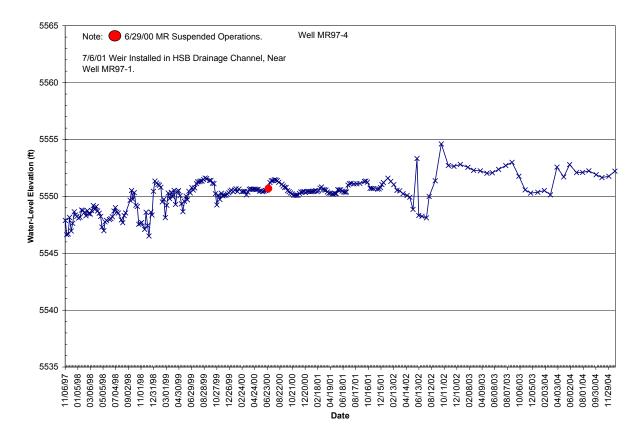


Figure 2-16 . Water-level hydrographs for well MR97-4.

No water-quality samples were collected from this group of wells in 2001, 2002, 2003, or 2004. Previous sampling documented the presence of elevated metals in the area. This contamination is most likely the result of the leach pad and precipitation plant operations.

Section 2.1.4 GS-Series Wells

Continuous and monthly water-level monitoring of the six GS wells continued throughout 2004. The locations of these wells are shown on figure 2-17. Table 2.1.4.1 contains annual water-level changes for these wells. Wells GS-41, GS-44, and GS-46 are nested pairs. That is, the wells are drilled adjacent to each other, but they are drilled and completed at different depths. The S and D identify the shallow and deep wells in each nested pair. Water levels had a net decline in all six wells during 2004, following last year's net increase. Water levels have declined during six of the past seven years.

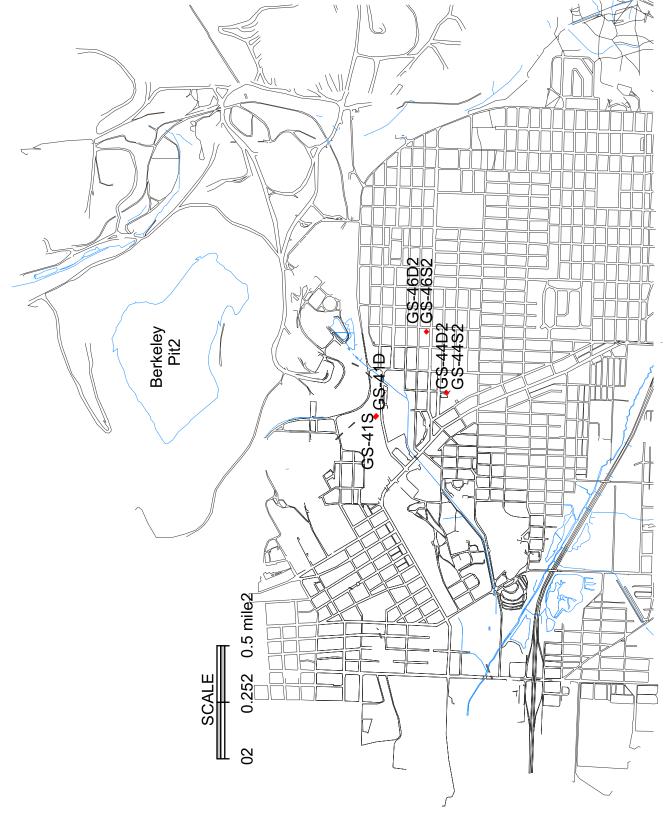
Year	GS-41S	GS-41D	GS-44S	GS-44D	GS-46S	GS-46D
1993	0.76	0.78	0.62	0.66	0.80	0.78
1994	0.20	0.23	0.00	0.00	0.18	0.24
1995	1.35	1.29	1.32	1.26	1.38	1.30
1996	0.59	1.65	1.12	0.89	0.98	1.20
1997	1.32	0.20	0.58	0.79	1.09	1.18
1998	-0.18	-0.06	0.09	0.07	0.17	0.24
1999	-1.41	-1.49	-1.28	-1.25	-2.41	-1.65
2000	-1.91	-1.78	-1.51	-1.39	-1.21	-20.7
2001	-0.28	-0.41	-0.22	-0.38	-1.78	-0.92
2002	-0.82	-0.81	-0.94	-0.82	-1.18	-1.18
2003	0.19	0.26	0.27	0.17	-081	0.77
2004	-0.31	-0.28	-0.76	-0.52	-0.08	-0.02
Net Change	-0.50	-0.42	-0.71	-0.52	-0.11	-0.13

Table 2.1.4.1Annual water-level changes in GS-series wells.

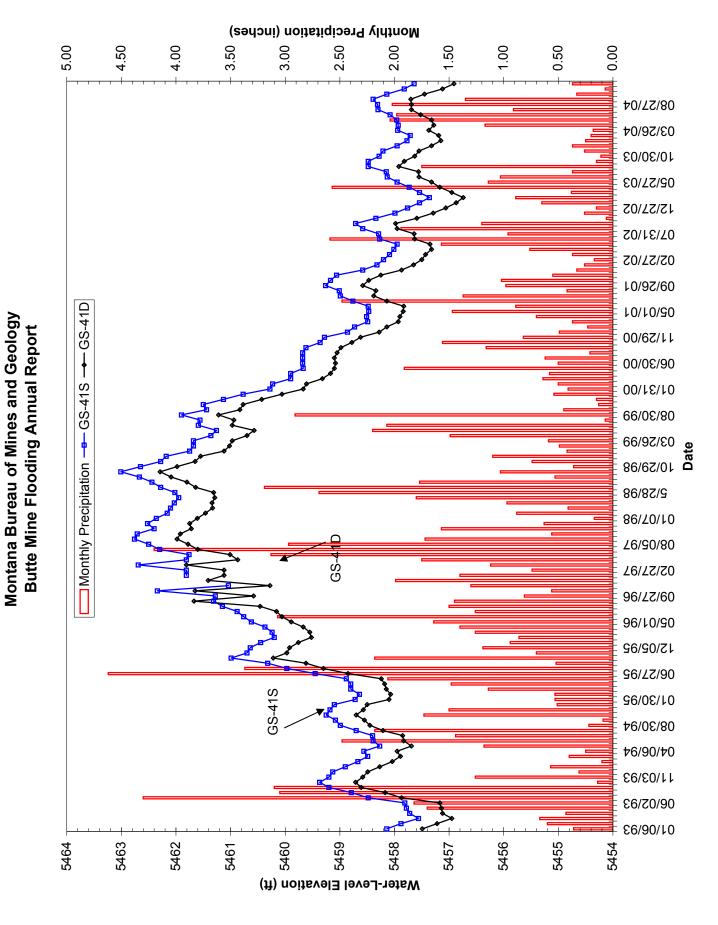
Figures 2-18 through 2-20 are water-level hydrographs with monthly precipitation totals shown for well pairs GS-41, GS-44, and GS-46. The seasonal variations in water levels closely follow monthly precipitation trends. Water levels begin a gradual increase in the spring as precipitation increases and then decline throughout the fall. In the past there has been a two- to three-month lag (delay) between peak rainfall and peak water levels; however, in 2004 water levels declined as rainfall decreased.

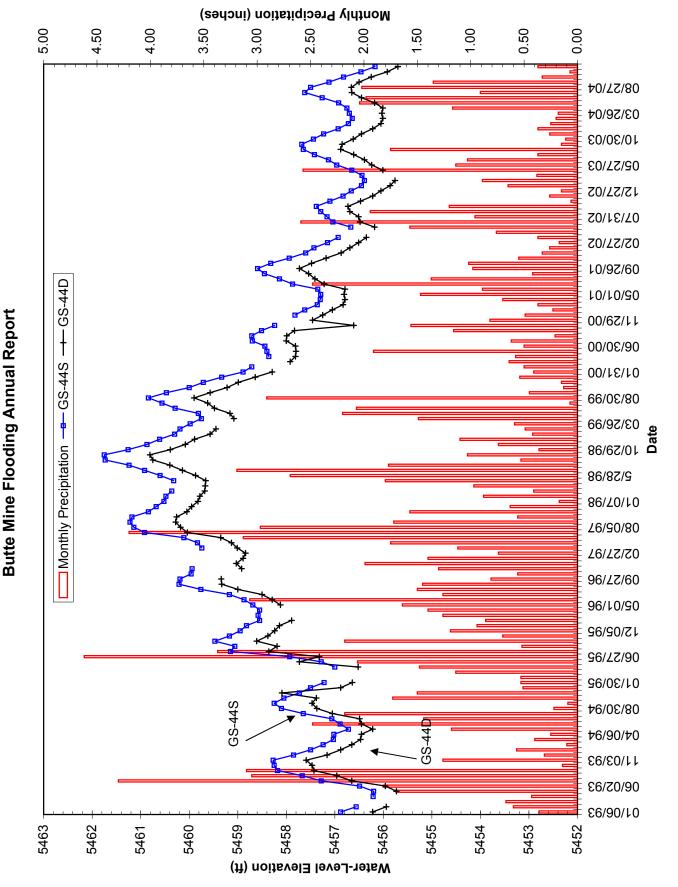
Water-level changes in wells GS-41S and GS-41D were similar once again during 2004 (fig. 2-18) and the influence of precipitation was very noticeable. Water levels decreased about 0.3 foot in these two wells during 2004.

Wells GS-44S and GS-44D had similar water-level changes throughout 2004 (fig. 2-19). The rise and fall of seasonal water levels are similar to those described for wells GS-41S and 41D. The water levels had a decline somewhat greater than the GS-41 wells, varying between 0.5 foot and 0.8 foot for 2004.



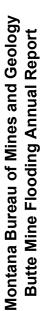


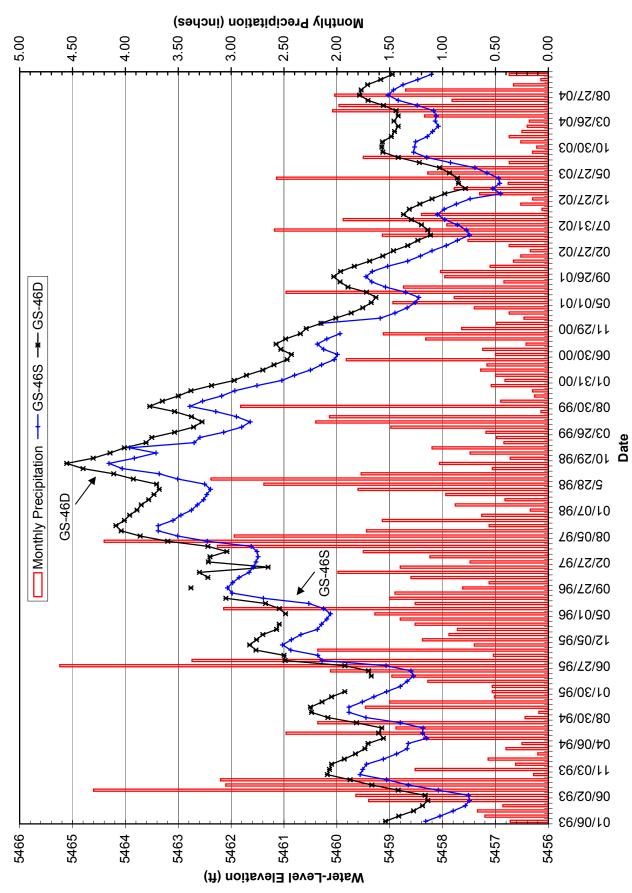




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Figure 2-19. Water-level hydrographs for GS-44S and GS-44D wells.





Overall, water-level trends were similar during 2004 in wells GS-46S and GS-46D (fig. 2-20), and followed the trends discussed previously for wells GS-41 and GS-44. Water levels declined less than 0.10 foot in both wells during 2004.

In both the GS-41 and GS-44 wells, the water levels in the shallow wells are higher than those of the deeper wells, implying that there is a downward vertical gradient. That is, water in the upper part of the alluvial aquifer is moving down, providing recharge to the lower portions of the aquifer. Water levels in wells GS-46S and GS-46D show the opposite. The water level in well GS-46D is higher than the water level in GS-46S. This implies that water has the potential to move upwards in the aquifer and possibly discharge into a surface-water body, such as Silver Bow Creek.

2.1.4.1 GS-Series Wells Water Quality

Water-quality samples were collected during both sample events from these wells as part of the 2004 BMFOU monitoring. These were the first water-quality data collected from these wells for several years. The poor water quality in GS-41S reflects its proximity to the Parrot tailings area; concentrations of dissolved constituents are extremely high. Data collected in 2004 confirms upward trends in nearly all dissolved constituents in GS-41S. The concentrations of several dissolved metals exceed maximum historic values. Well GS-41D, which has slightly better (but still extremely poor) water quality, exhibits a similar increase in the concentration of most dissolved constituents.

The concentration of several dissolved constituents continues to exceed MCLs in well GS-44S at the north end of Clark's Park. The concentrations of several dissolved metals, particularly cadmium and zinc, have decreased to below the MCL in recent samples. Well GS-44D continues to exhibit concentrations greater than MCLs, but overall concentrations have decreased by as much as 50 percent over the period of record and several were approaching the MCL. Data collected in 2004, however, suggest a reversal of the downward trend. Wells GS-46S and D, northeast of Clark's Park, continued to exhibit good water quality in 2004 and show little or no trend.

Section 2.2 East Camp Underground Mines

Monitoring of water levels in the seven East Camp underground mines continued. Their locations are shown on figure 2-21. During the year 2004, water levels rose between 7 and 8 feet in the mines, which is 5 to 6 feet less than last year. The Berkeley Pit water level rose 7.68 feet, which is about 6 feet less than last year (table 2.2.1). The lower rate of water-level rise is most likely directly related to the removal of HSB drainage water, which is no longer flowing into the Berkeley Pit. Figure 2-22 shows the annual water level changes graphically for these sites. The net 2004 water-level change between the mine shafts and Berkeley Pit was very comparable.

Figure 2-23 is a hydrograph based upon water levels for the Anselmo Mine and Kelley Mine. There are no obvious variations in water levels on this figure; however, when water levels are plotted from 1995 through 2004, several changes are noticeable (fig. 2-24). The cessation of HSB drainage

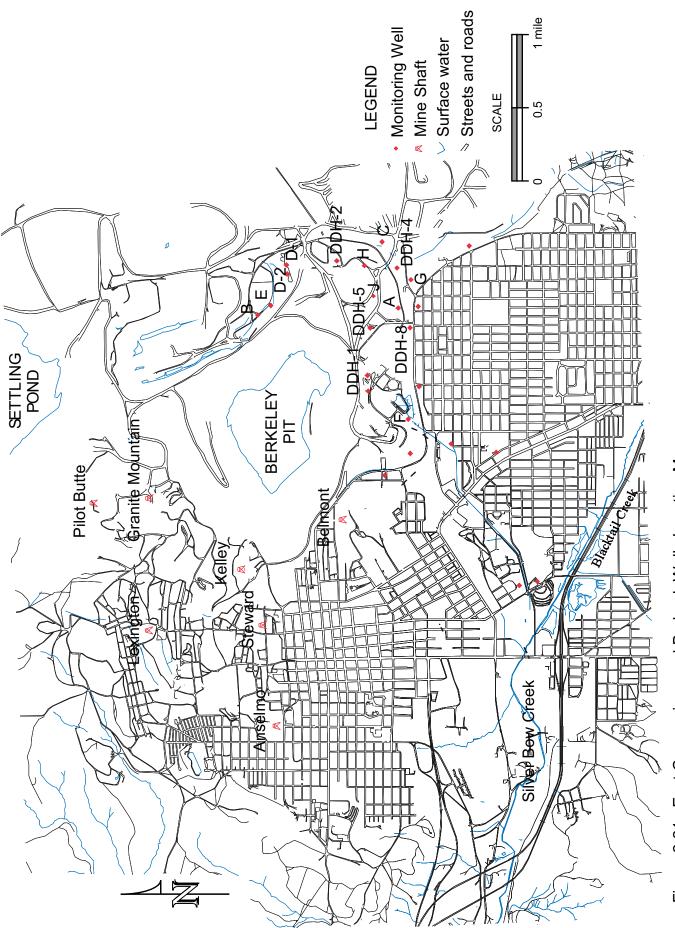
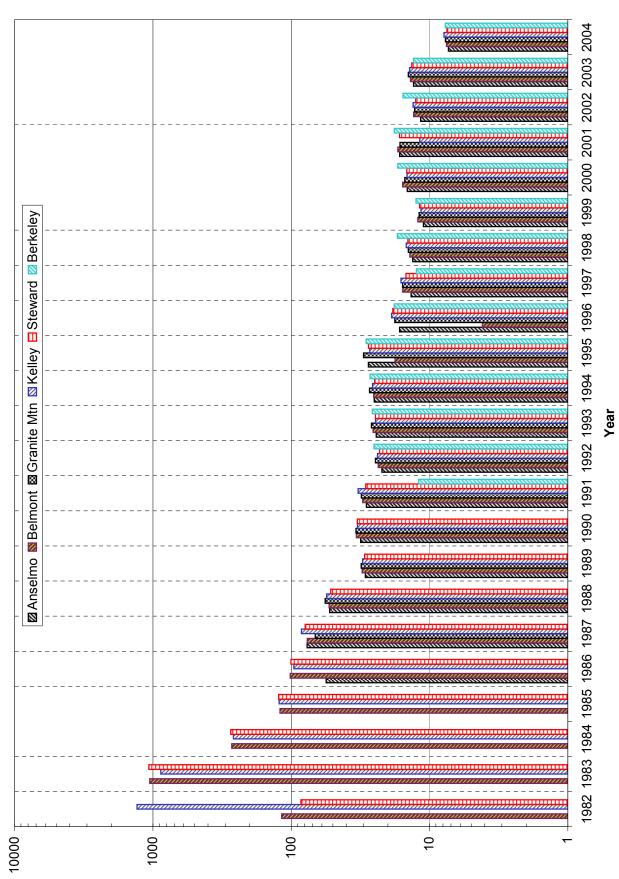
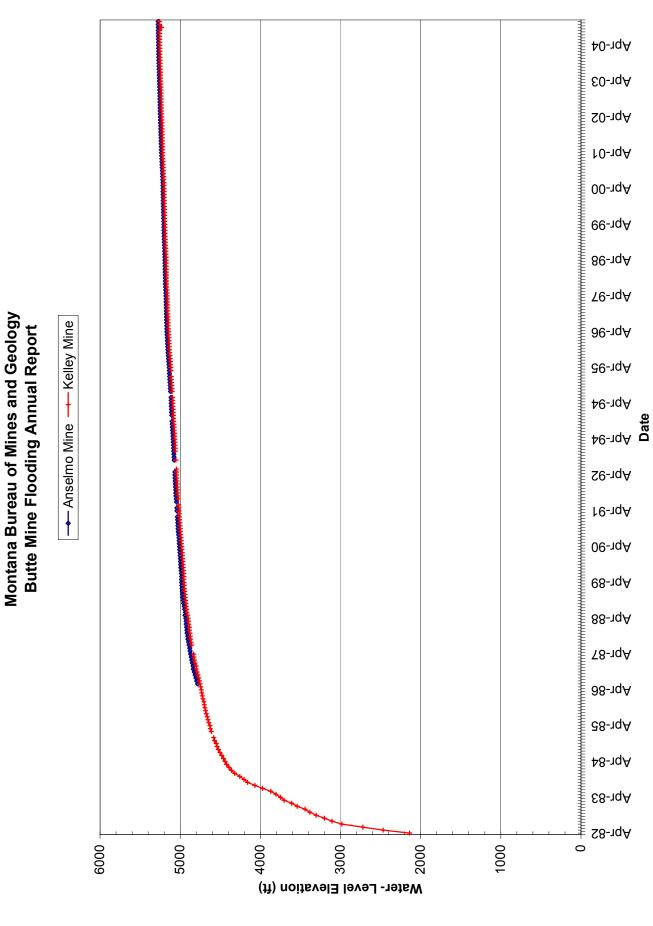


Figure 2-21. East Camp mines and Bedrock Wells Location Map.





(ft) egnada (ft) Water-Level Change



Year	Berkeley Pit	nselmo	Kelley	Belmont ⁽¹⁾	Steward	Granite Mountain	Lexington ⁽²⁾	Pilot Butte
1982			1,304.00	117.00	85.00			
1983			877.00	1,054.00	1,070.00			
1984			262.00	269.00	274.00			
1985			122.00	121.00	123.00			
1986		56.00	96.00	102.00	101.00			
1987		77.00	84.00	77.00	79.00	67.00		
1988		53.00	56.00	53.00	52.00	57.00	8.10	
1989		29.00	31.00	31.00	29.00	31.00		
1990		32.00	33.00	34.00	33.00	34.00		
1991	12.00	29.00	33.00	30.00	29.00	31.00		
10- Year								
Change	12.00	276.00	2,898.00	1,888.00	1,875.00	220.00	8.10	
1992	25.00	22.00	24.00	24.00	23.00	25.00		
1993	26.00	24.00	25.00	26.00	25.00	26.00		
1994	27.00	25.00	26.00	25.00	25.00	27.00		
1995	29.00	28.00	27.00	18.00	28.00	30.00		
1996	18.00	16.00	19.00	4.15	18.00	18.00	1.19	3.07
1997	12.00	13.58	16.09	15.62	14.80	15.68	12.79	18.12
1998	17.08	13.23	14.73	13.89	14.33	14.24	13.71	11.26
1999	12.53	11.07	11.52	12.15	11.82	11.89	10.65	11.61
2000	16.97	14.48	14.55	15.66	14.60	15.09	14.01	14.11
2001	17.97	16.43	11.77	16.96	16.48	16.35	15.95	16.59
2002	15.56	11.60	13.15	13.02	12.60	12.82	12.08	11.33
2003	13.08	13.05	13.94	13.74	13.44	14.23	2.75	14.05
2004	7.68	7.31	7.86	7.54	7.48	7.67		7.53
Grand Total Change*	250.06	491.01	3,121.06	2,092.44	2,099.69	453.94	91.23	107.67

Table 2.2.1 Annual water-level changes in East Camp mines, in feasible
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(1) Mine shaft collapsed in 1995; a replacement well was drilled adjacent to the mine, into mine workings, in 1997. Since the well was drilled into the Belmont Mine workings, it is assumed that this water level is reflective of the Belmont Mine.

(2) No water-level measurements since February 2003, due to obstruction in shaft at 366 ft below surface.

(*)Total change is the measured change in water level. Access or obstructions have prevented continuous water-level measurements at some sites.

water from entering the pit in 1996 resulted in a flattening of the line, while the 2000 addition of this same water resulted in an increased slope of the line. The slope of the line, or rate of rise, shown on figure 2-24 flattened out throughout 2004, which coincides with the removal of HSB water from entering the pit. The treatment of HSB drainage water in the HSB treatment plant, which came on-line during late November 2003, had a very significant influence on 2004 water levels.

Figure 2-25 shows monthly water-level changes in the Berkeley Pit through 2004. The addition of HSB drainage water continued through late November 2003, after which this water was diverted to the HSB water-treatment plant. Water-level changes seen over the last 6 months of 2000, following the addition of HSB drainage water, continued through 2003. However, water-level increases were much less throughout 2004 as a result of the decreased inflow of water into the pit. A similar trend was seen in all the East Camp underground mines. Water levels remain the highest in the sites farthest from the Berkeley Pit. This continues to confirm that water is flowing towards the pit, thus keeping the pit the low point in this system.

Figure 2-26 is a plot of selected mine-shaft water levels versus precipitation. There is no apparent influence on water levels in the underground mines from monthly precipitation. It is obvious that the rise in water levels is a function of historic mine-dewatering activities and the void areas in the underground mines and Berkeley Pit, and is not a function of precipitation. Based upon volume estimates of the underground mines and December 2003 water-level elevations, over 90 percent of the underground mine workings are flooded.



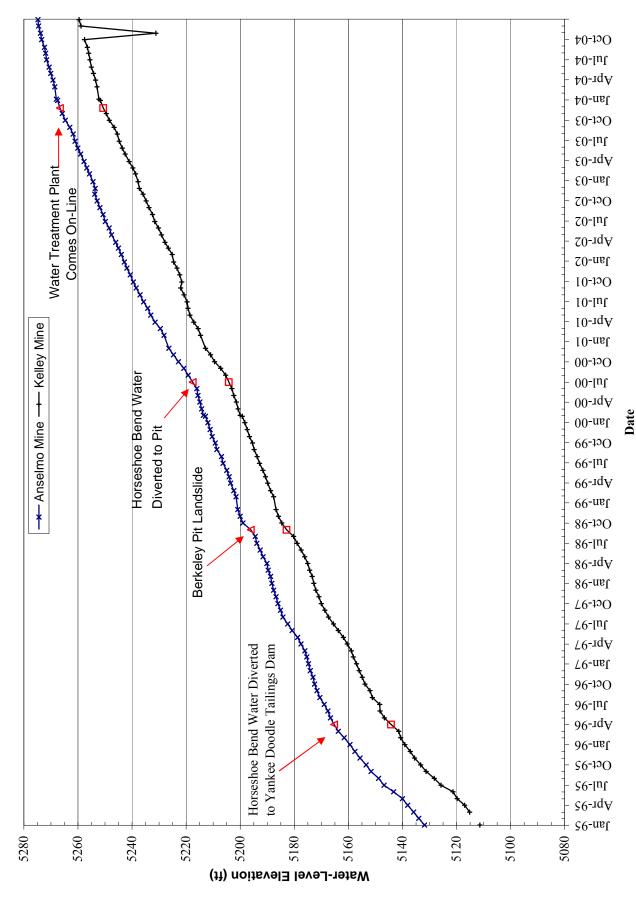


Figure 2-24. Water-level hydrograph, 1995-2004, Anselmo Mine and Kelley Mine.



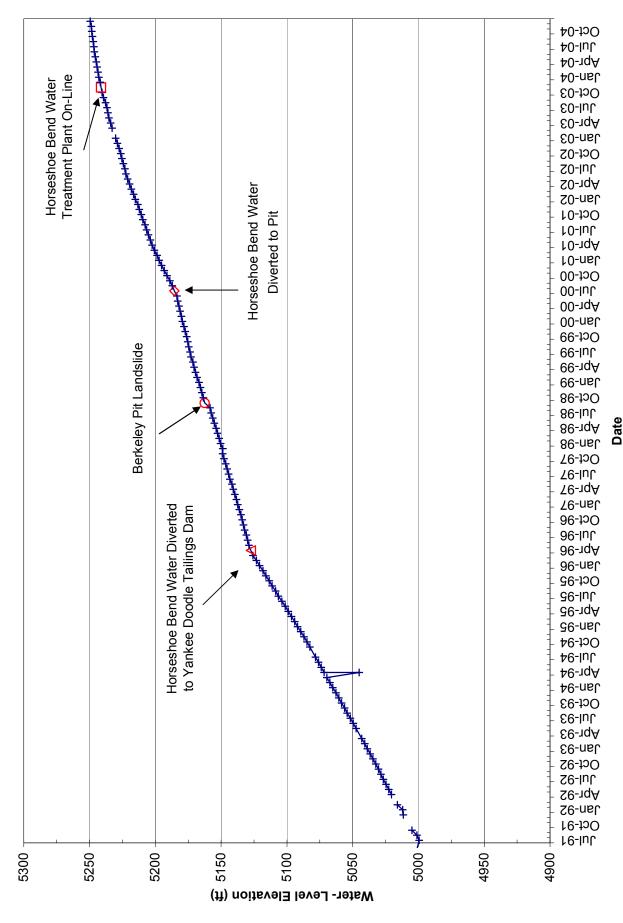
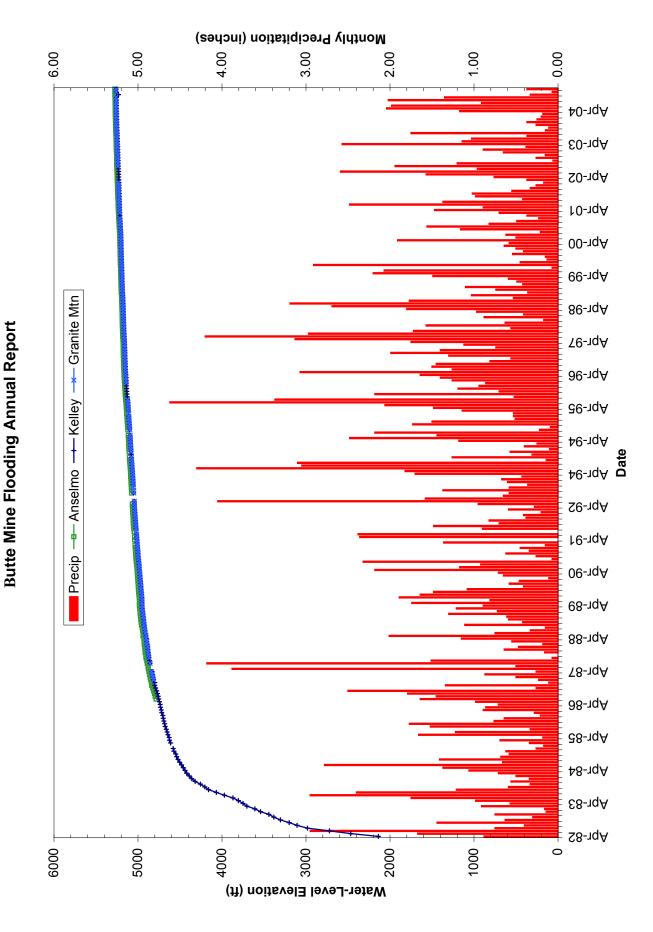


Figure 2-25. Water-level hydrograph for the Berkeley Pit.



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Figure 2-26. Water-level hydrographs for selected East Camp Mines, with monthly precipitation.

Section 2.2.1 Water Quality

Earlier reports discussed the lack of appreciable change in water quality of the East Camp mines until 2002 when several of the shafts exhibited significant departure from previous trends. Data from the 2004 sampling indicate that the changes in concentration are sustained for yet another year. Again, most notable is the increase in the concentration of metals, arsenic, and sulfate in the Kelley shaft; the exception being that of dissolved copper that continues to decrease in concentration. The relationship between the concentration of zinc (increasing) and copper (decreasing) should be explored, but requires a great deal more sampling than the current effort.

The Anselmo shaft exhibits a continued increase in arsenic and iron concentrations (fig. 2-28). The concentration trends in the Steward shaft also continue as they have in the recent past. As with the Kelley, the current data collection at these sites only allows the observation of change, not an explanation.

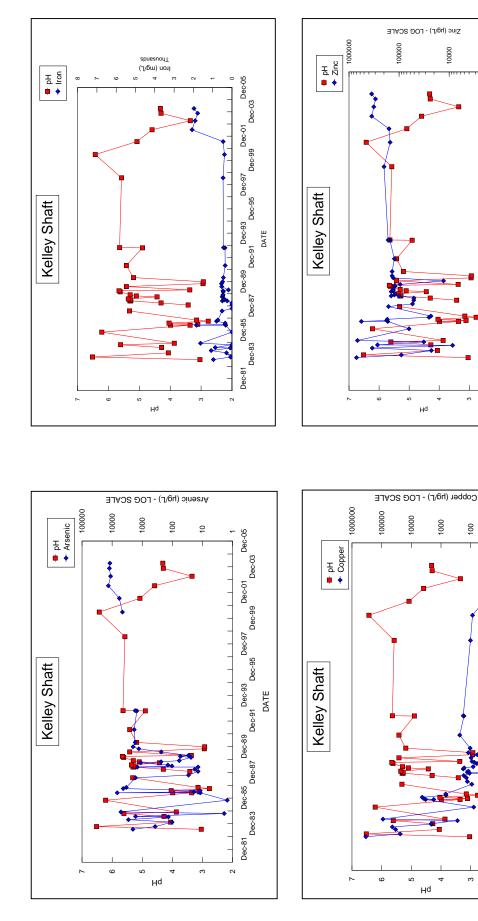
- Anselmo: the concentration trend for iron, aluminum, and arsenic concentrations continue upward to near or above historic concentrations; zinc and cadmium show large (order of magnitude) fluctuations (fig. 2-28). Copper concentrations remain very low (<20 µg/L).
- Steward: the trend of concentrations of most constituents in the Steward shaft has been slightly upward in the recent period of record. The trend has been downward for zinc and copper (fig. 2-29).
- Kelley: iron, sulfate, arsenic, and aluminum have increased to near historic concentrations; copper concentration remains very low (fig. 2-27).

Section 2.2.2 RI/FS Bedrock Monitoring Wells

Monitoring of the 9 RI/FS and ROD-installed bedrock wells continued. Monitoring well locations are shown on figure 2-21. Water levels continue to rise in wells A, C, D-1, D-2, G, and J at rates similar to those in the East Camp Mine system. Water levels in well E continue to follow patterns identified in earlier reports, while water levels in well F increased slightly, the second yearly net rise in 6 years. Table 2.2.2.1 contains yearly water-level changes and figure 2-30 shows these changes graphically.

The monitoring program contained in the 2002 CD specified that water levels be monitored on a continuous basis in bedrock wells A, B, C, and G. Water-level transducers were installed in each of these wells and set to collect water-level data every hour. This detailed level of monitoring allows recording of changes in water levels not seen when only one water-level measurement is taken monthly.

Figures 2-31 and 2-32 are hydrographs for wells A, D-1 and D-2. The continued and steady rise in water levels is very apparent. Precipitation is also shown on these figures to compare water-level changes to precipitation. Unlike a number of the shallow alluvial wells, no variations in water levels are noted either seasonally or yearly as a result of precipitation. Water levels in the bedrock aquifer, which had been affected by historic underground mine dewatering, are responding to the cessation of pumping





10000

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Dec-05

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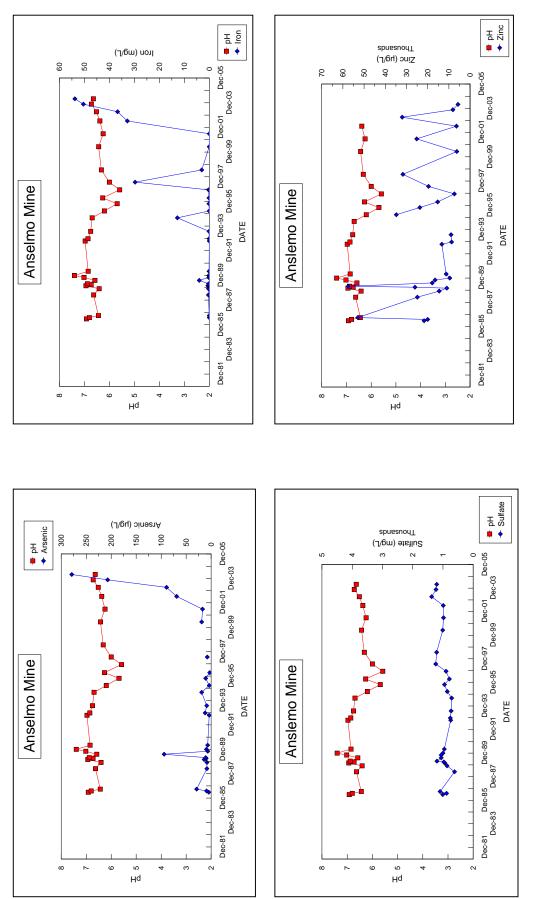
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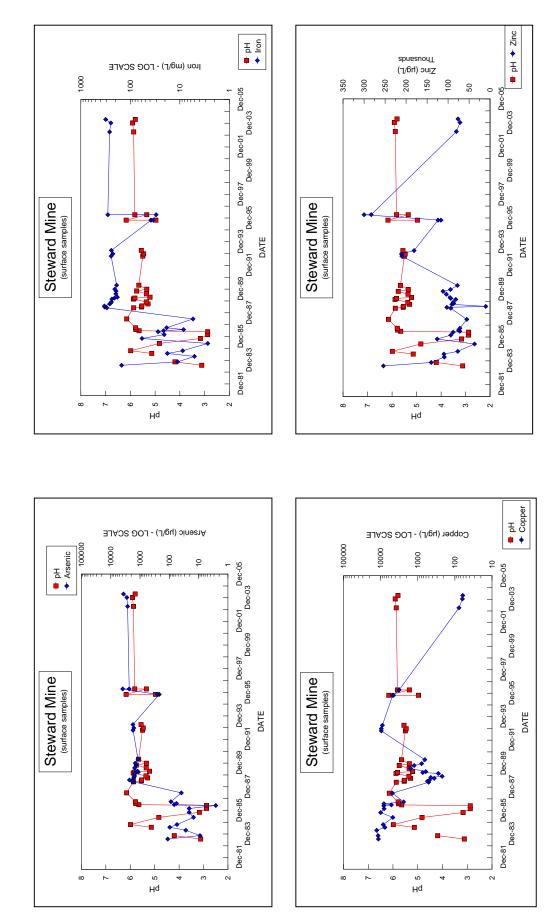
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and show no apparent relationship to precipitation through 2004. Instead, physical changes that affect the flow of water into the Berkeley Pit and underground mines, e.g. the 1996 HSB water diversion and the 2000 addition of the HSB drainage flow, are very apparent, and are the major influences on water-level increases (fig. 2-33). The void areas in the mines and Berkeley Pit control the annual rate of rise in this system.

Year	Well A	Well B	Well C	Well D-1	Well D-2	Well E	Well F	Well G	Well H	Well J
1989										
1990										
1991	33.18		22.38	24.20	22.68	1.73				
1992	39.22	8.78	26.53	27.89	25.04	0.47	-1.92			
1993	27.95	8.68	21.72	24.41	24.51	-0.37	1.09			
1994	25.65	7.90	23.88	25.12	25.21	0.27	0.11			
1995	28.69	13.41	29.55	26.99	27.50	0.44	1.65	28.74	30.37	
1996	19.31	14.56	26.22	18.77	18.92	0.48	-0.11	22.40	18.72	
1997	14.44	12.35	19.25	13.62	13.68	-0.64	1.41	15.67	3.76	
1998	15.96	11.30	16.68	16.41	16.39	0.44	1.03	15.56	15.44	
Total 10-										
Year	004.4	70.00	400.04	477 44	470.00	0.00	0.00	00.07	~~ ~~	
Change	204.4	76.98	186.21	177.41	173.93	2.82	3.26	82.37	68.29	
1999	11.21	5.11	12.44	12.18	12.03	-0.78	-1.80	12.00	P&A	1.99
2000	15.12	8.20	13.39	14.66	15.79	-2.68	-2.49	12.84	P&A	16.19
2001	18.33	9.08	16.86	19.81	18.61	-3.58	-0.61	16.56	P&A	18.81
2002	15.16	1.73	14.41	14.69	14.76	-3.37	-0.73	14.84	P&A	15.29
2003	12.75	8.70	13.20	13.69	13.72	-2.66	1.16	12.71	P&A	13.48
2004	7.60	4.46	8.71	7.90	7.83	-1.12	0.32	8.31	P&A	7.58
Total Change*	284.57	114.26	265.22	260.34	256.67	-11.37	-0.89	159.72	68.29	73.34
N										
Year	DDH-1		DDH-2	DL)H-4	DDH-5		DDH-8		
1989	29.53		~~~~	-		34.83		30.48		
1990	36.24		30.99		.44	27.61		35.96		
1991	27.03		28.20		0.81	27.01		28.96		
1992	28.25		26.09		⁷ .66	21.07		26.16		
1993	24.33		24.16		5.88	24.40		24.46		
1994	25.00		25.65		3.34	19.78		15.97		
1995	27.66		28.74		8.80	26.10				
1996	18.53		18.97).24	12.41		55.68		
1997	13.33		14.09		.32	15.89		13.38		
1998	15.03		16.20	10	5.25	16.50		16.50		
*Total 10 Year	244.93		213.09	21'	7.74	235.60		247.55		
Change	244.33		215.05	21		233.00		247.33		
1999	11.66		12.00	11	.88	4.82		15.50		
2000	14.64		16.11		.77	P&A		10.42		
2000	18.14		18.78		8.52	P&A		18.93		
2002	14.63		14.80		8.14	P&A		13.64		
2002	13.05		13.90		NA	P&A		14.49		
2003	7.08		7.89		NA NA	P&A		7.90		
Total	324.13		296.57		6.05	240.42		328.43		
Change*	0210					/ L				

(*)Total change is the measured change. Access or obstructions prevented continuous water-level measurements at some sites. P&A – well plugged and abandoned due to integrity problems. Well J was drilled as a replacement for well H.

Water levels measured in well J since its completion in 1999 have been in the same range as those in other surrounding bedrock wells, and are shown on figure 2-34. Historic water levels for well H are shown on this figure with a linear projection of water levels included. Water levels for well J plot very close to those projected for well H, verifying that well J was completed in the same bedrock zone as well H. However, beginning in April 2004, the water level for well J plots below the projected water level for well H. This is a result of the filling rate slowing from the diversion and treatment of water from the HSB drainage. The projected water level for well H does not take into account the removal of HSB water from the pit.

The water-level change in well B was about one-half the rate of that of the above bedrock wells and Berkeley Pit over a number of years, until November 2002. Due to a water-level decline during November and December, the 2002 rate of water-level rise was only 11 percent of that of the Berkeley Pit. The 2004 water-level increase was closer to 60% that of the other bedrock wells. Hydrographs for wells A and B, showing monthly water-level elevations, are shown on figure 2-35.

Water levels in wells E and F do not follow the trends seen in the other bedrock wells (fig. 2-36). Water levels in these two wells are considerably higher than those in the other bedrock wells, indicating a lack of dewatering from historic mining activities.

Water-level monitoring continues to confirm that the flow of water in the affected bedrock aquifer is towards the Berkeley Pit. The potentiometric-surface map (fig. 2-37) for the East Camp bedrock aquifer shows the flow of water from all directions is towards the pit.

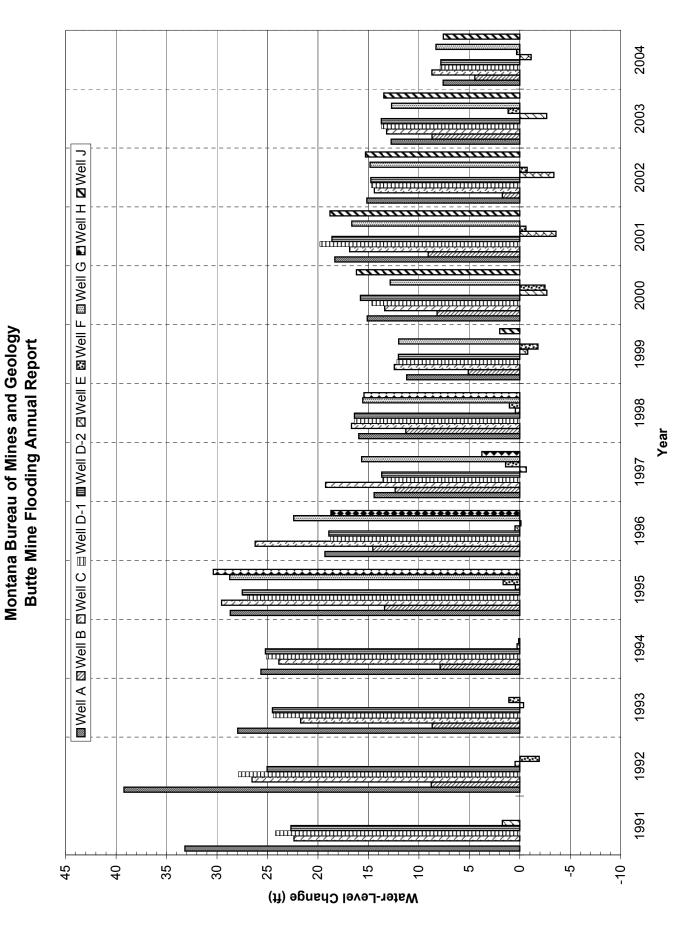


Figure 2-30. RI/FS bedrock wells annual water-level change.

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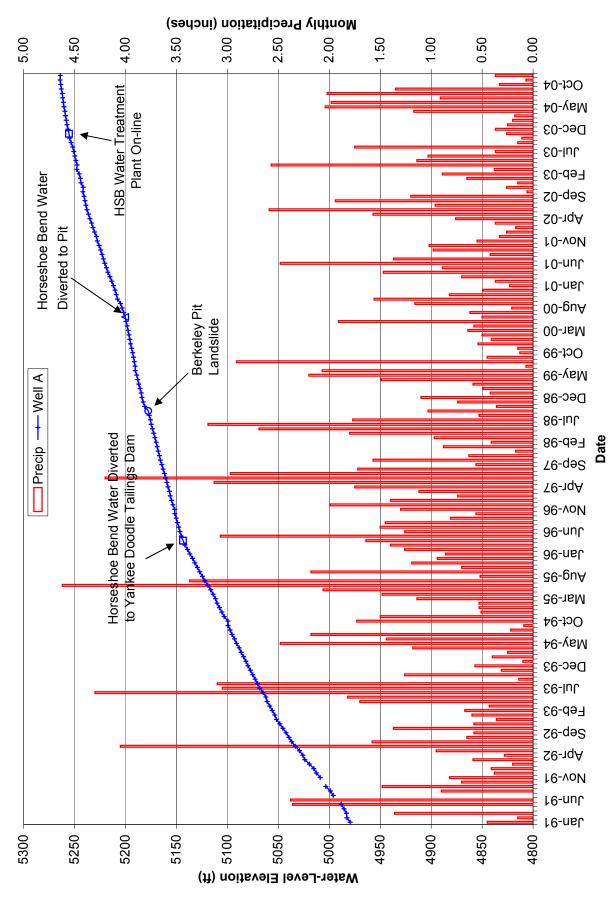
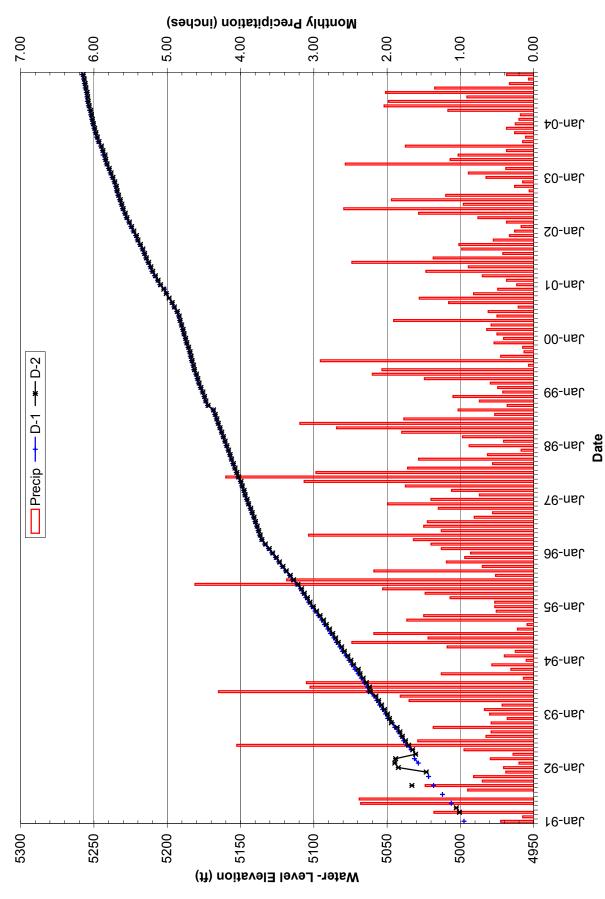
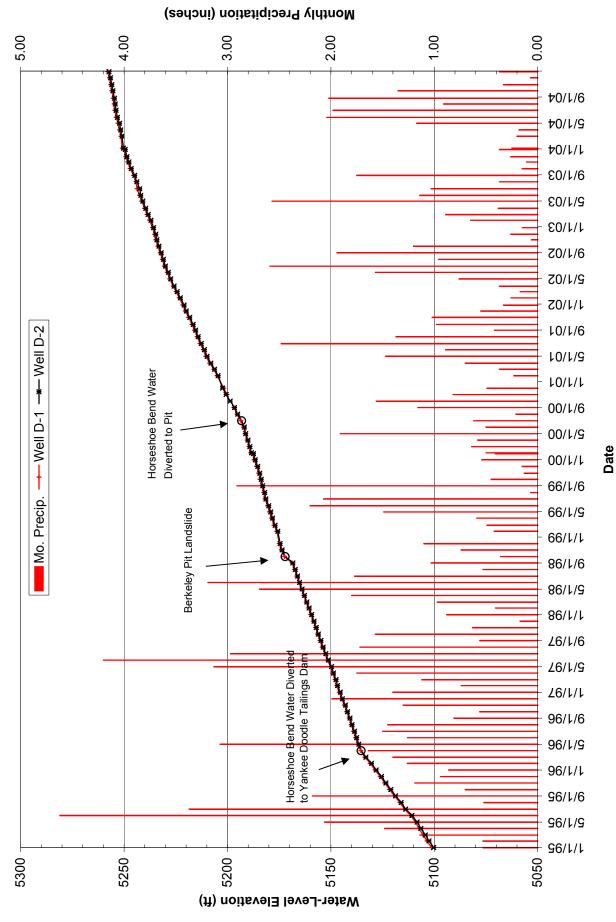


Figure 2-31. Water-level hydrograph for bedrock well A.

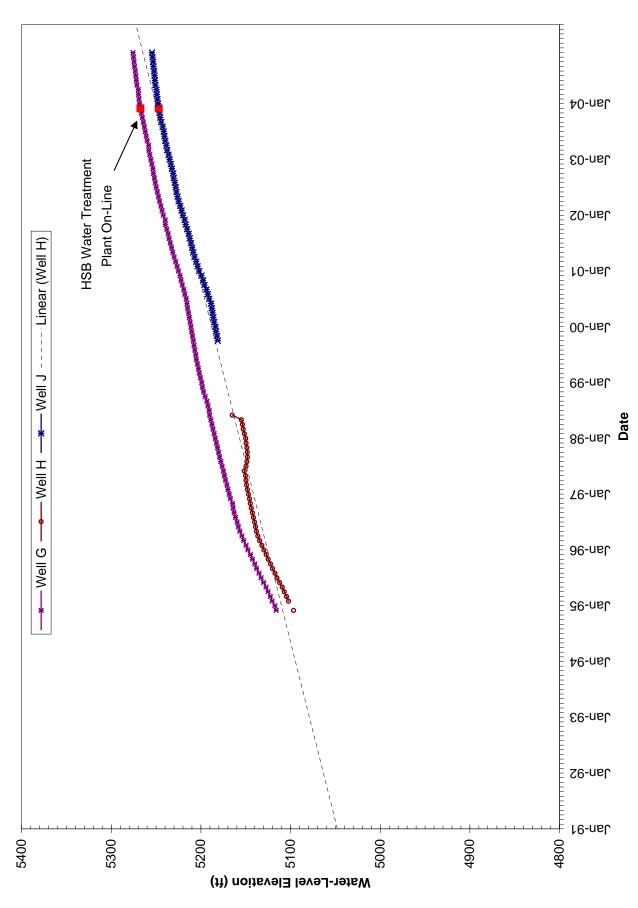




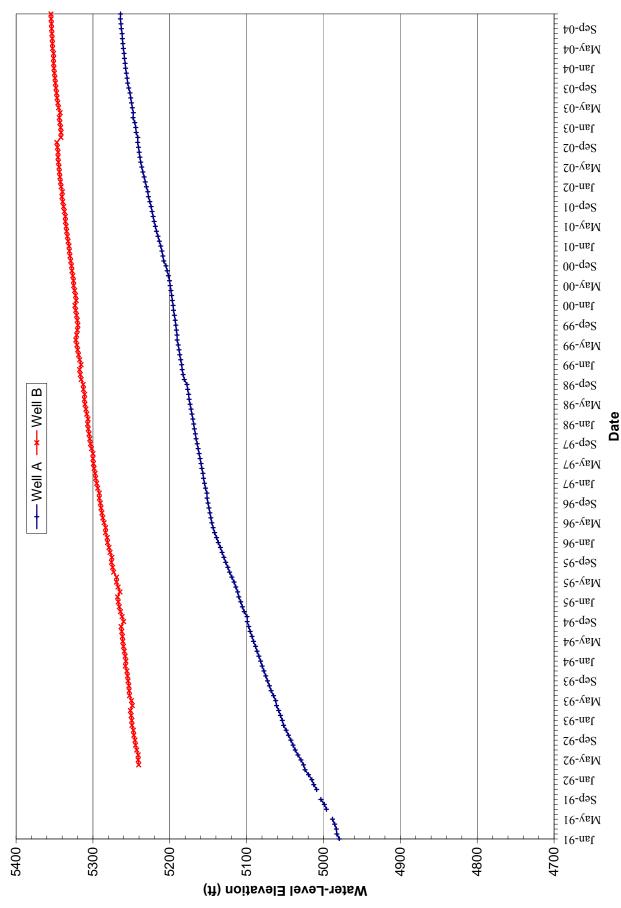


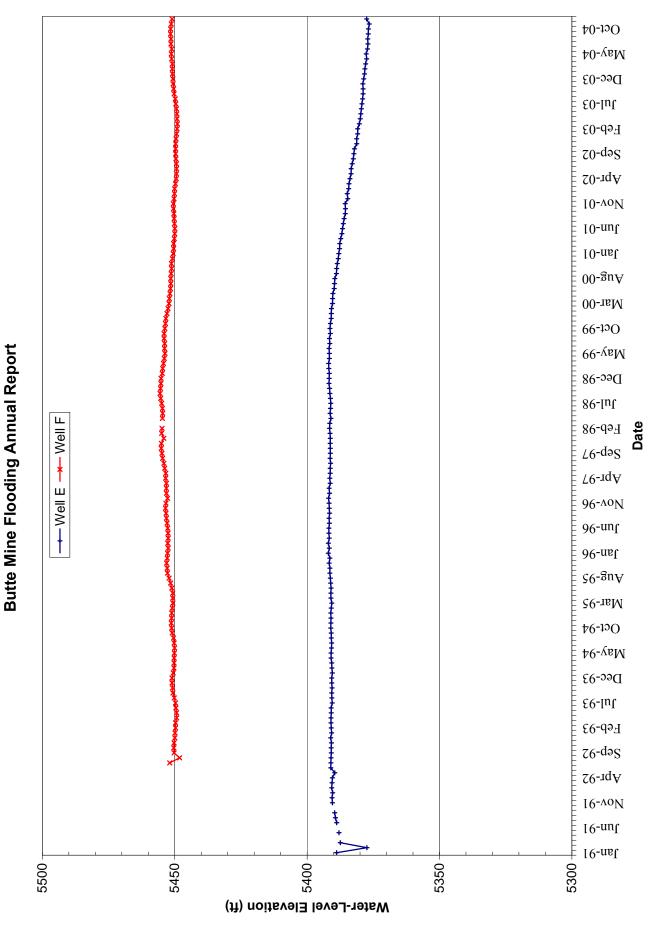






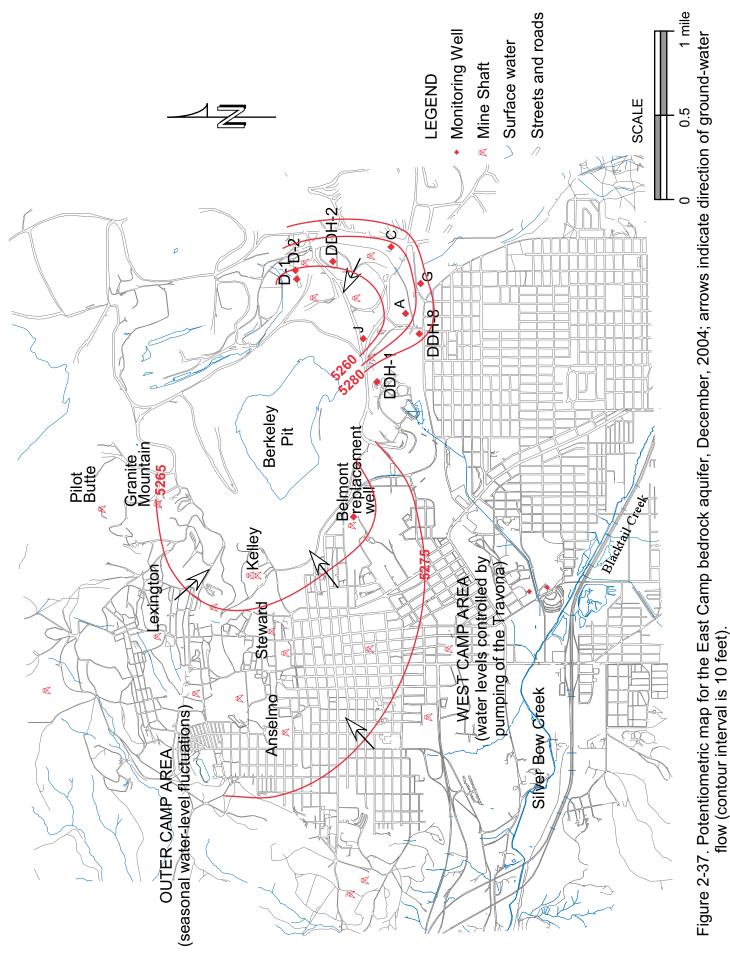






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Figure 2-36. Water-level hydrograph for bedrock wells E and F.



Section 2.2.2.1 RI/FS Bedrock Well Water Quality

Water quality in the East Camp bedrock wells has shown little change in recent years. Data collected in 2004 indicate only slight change for most wells. Table 2.2.2.1.1 summarizes the water-quality trends over the past few years; as noted in previous reports, the status of wells B and D-1 changed with respect to MCLs due to the change in the water-quality standard of arsenic from 18 to 10 μ g/L. In most wells, there was little change in the concentration of dissolved constituents. Well J has been showing increased concentrations of zinc, cadmium, and several other metals. Data collected in 2004 show a continuation of this trend (fig. 2-38).

Well Name	Exceedances* (1 or more)	Concentration Trend	Remarks
A	Y	None	arsenic (MCL), sulfate (SMCL)
В	Y	None	arsenic (MCL), sulfate (SMCL)
С	Ν	None	sulfate (SMCL)
D-1	Y	Variable	arsenic (MCL), sulfate (SMCL)
D-2	Ν	None	sulfate (SMCL)
Е	Y	Variable	sulfate (SMCL), arsenic (MCL)
F	Y	None	arsenic (MCL), sulfate (SMCL)
G	Ν	None	sulfate (SMCL)
J	Y	Upward	very poor quality water

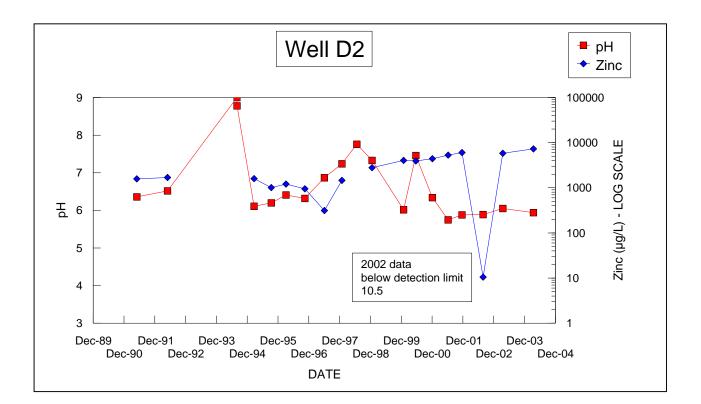
Table 2.2.2.1.1 Exceedances and recent trends for East Camp bedrock wells, 1989 through 2004.

(*) excludes sulfate

Section 2.2.3 DDH Series Wells

Water-level monitoring of the DDH series wells continued. Water levels have continued to rise in these wells, following previous trends. The water-level rise in wells DDH-1, DDH-2, and DDH-8 ranged from 7 to 8 feet in 2004. The rates of rise are consistent with those of the other bedrock wells and East Camp mine shafts. Figure 2-39 shows a hydrograph for well DDH-2 showing water-level increases. Once again, precipitation does not show any effect on water-level rise.

No water-quality samples were collected from these wells, as they are used for water-level monitoring only.



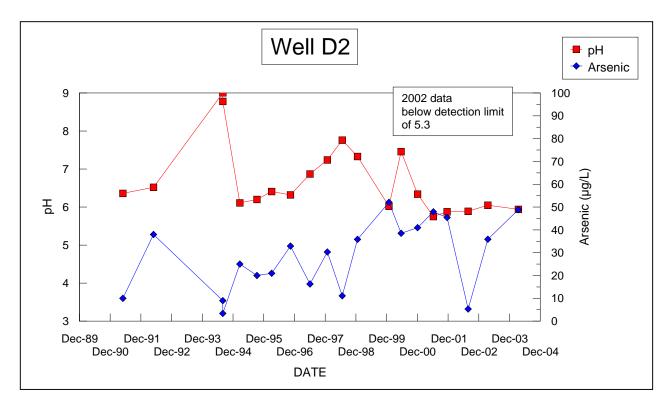
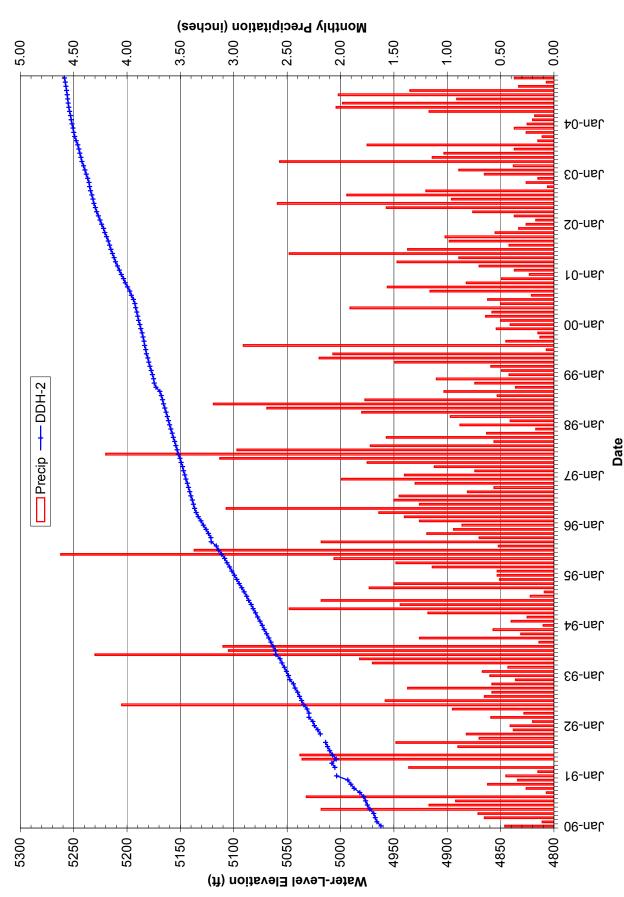


Figure 2-38. Zinc and arsenic concentrations for bedrock well D-2.







Section 2.3 Berkeley Pit, Continental Pit, and Horseshoe Bend Drainage

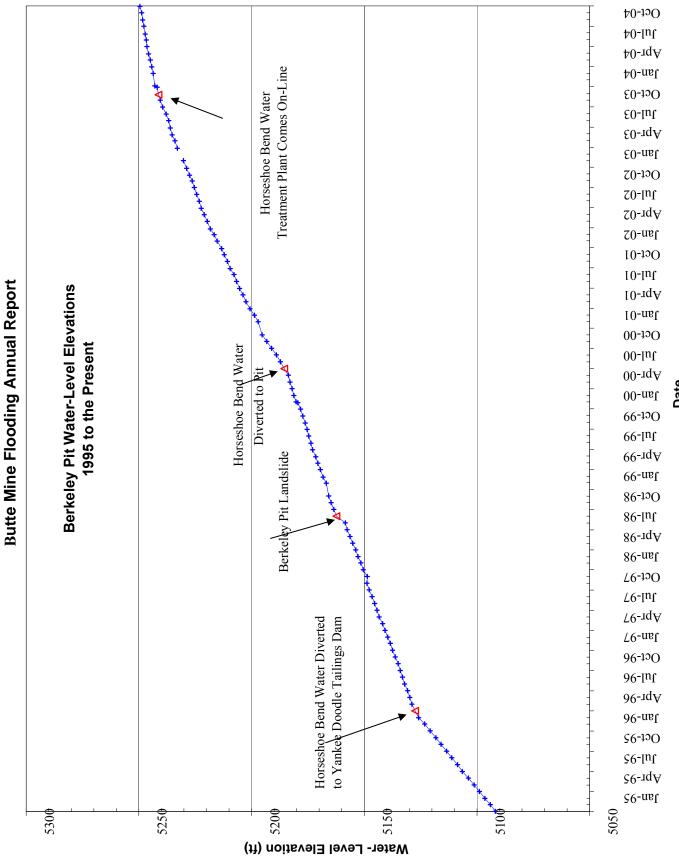
The Berkeley Pit water-level elevation was surveyed each month to coincide with monthly water-level monitoring in wells. Figure 2-40 is a hydrograph showing the pit's water-level rise over time. The overall trend is similar to that of previous years. However, in contrast to prior years, there are four noticeable changes on this figure. The first change represents a decrease in the filling rate (seen as a change in slope on the graph) when the HSB drainage diversion occurred in April of 1996; the second is an almost instantaneous water-level rise from the September 1998 landslide; the third depicts an increased filling rate (seen as a change in slope on the graph) following MR's June 2000 suspension of mining and the subsequent inflow of water from the HSB drainage to the pit; and the fourth shows the decrease in filling rate as a result of the HSB water-treatment plant coming on-line in November 2003 and the diversion of HSB drainage water away from the pit. From April 1996 through June 2000, water from the HSB drainage was diverted and incorporated into the mining and milling process. Following the June 2000 suspension of mining, water from the HSB drainage was again allowed to flow into the Berkeley Pit. The volume of water allowed to enter the pit exceeded 3.2 billion gallons from July 2000 through November 2003 when the water-treatment plant became operable (fig. 2-41). This represents an average flow of 1,820 (gpm) during the period of mine suspension. The overall Berkeley Pit water-level rise for 2004 was 7.68 feet compared to 13.08 feet in 2003.

Flow monitoring of the Horseshoe Bend drainage continued throughout 2004. As discussed in previous reports, the 90° V-notch weir was relocated upstream in the HSB drainage to accommodate infrastructure changes associated with the water-treatment plant construction. Construction activities affected flow monitoring at times from April through October 2002; however, there were no major disruptions of monitoring activities during 2003 or 2004. Ice build-up on the holding pond and bio-fouling of the transducer used to measure flow are on-going problems associated with monitoring at this site. A chart recorder was installed the later part of 2004 to assist with monitoring and overcome the bio-fouling problems. The average daily flow rate was 1,279 gpm for 2004.

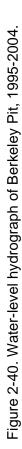
Flows measured at the HSB Falls flume averaged 130 gpm for the year, a decrease of 20 gpm from 2003 and 120 gpm from 2002. This flow is well below the historic flows of 1,000 gpm or more reported by MR. The decreased flow from this source would account for a portion of the flow change seen in the HSB drainage for 2004.

The Continental Pit water level was not monitored during 2004 as a result of the resumption of mining activities. This site was dropped from further monitoring activities.

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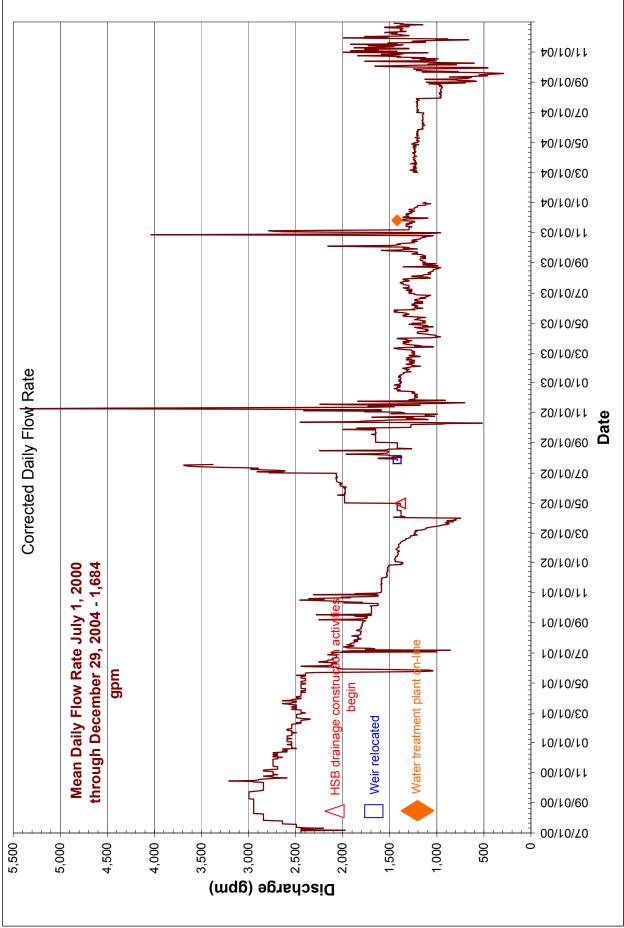


Figure 2-41. Horseshoe Bend Drainage Flow Rate, July 1, 2000 through December 29, 2004.

Section 2.3.1 Berkeley Pit, Continental Pit, and Horseshoe Bend Drainage Water Quality

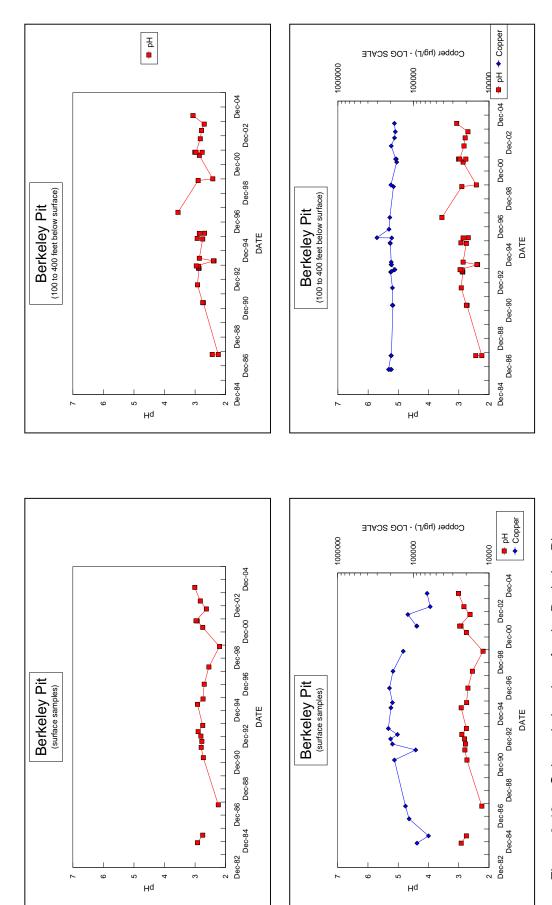
The overall trend in the concentrations of most dissolved constituents has changed little in recent years; data for 2004 show very little change from the previous year (fig. 2-42a, b, and c). As noted in the 2003 report, there is a remarkable difference in the concentration of iron between the Berkeley Pit and the Kelley shaft. The same difference was apparent in the 2004 samples; the concentration of iron was about 1,000 mg/L in the pit compared to about 2,000 mg/L in the Kelley shaft.

The chemistry of the discharge from the Horseshoe Bend drainage has shown little change in recent years; the overall trend has been toward decreasing concentrations of most dissolved constituents (fig. 2-43). The water quality of the HSB drainage continues to be slightly better than that of the Berkeley Pit (table 2.3.1.1).

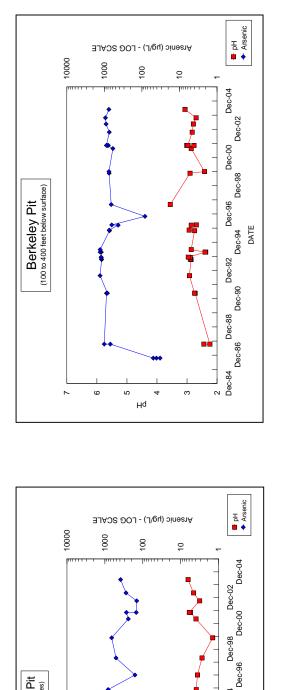
The concentration of zinc and sulfate in the discharge from the Sarsfield well has increased over the period of record (fig. 2-44), but overall, the water quality in the well is good. The well was pumped intermittently and, when operating, discharged about 250 gpm; 6 samples were collected in 2003 and no samples were collected in 2004.

Area	Sample	рН	Al	Cu	Pb	SO ₄	Zn
	Date	(S.U.)	(µg/L)	(µg/L)	(µg/L)	(mg/L)	(µg/L)
Berkeley Surface HSB Sarsfield	5/27/04 7/29/04 8/26/03	3.01 3.01 6.45	189,998 163,915 482	65,796 43,229 7	<20 <20 <10	7,560 4,062 1,338	435,575 211,700 2,992

Table 2.3.1.1Selected chemistry from the Berkeley Pit, Horseshoe Bend (2004), and Sarsfield well
(2003) data.







Berkeley Pit (surface samples)

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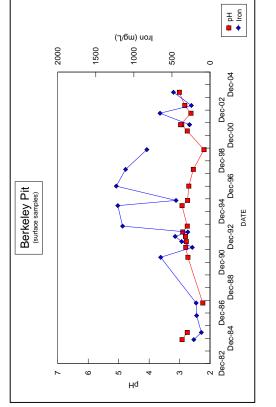
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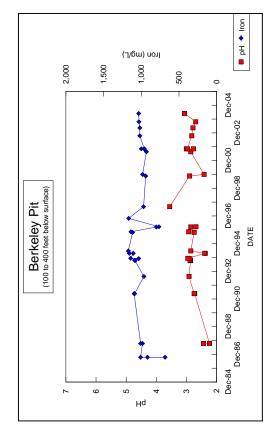
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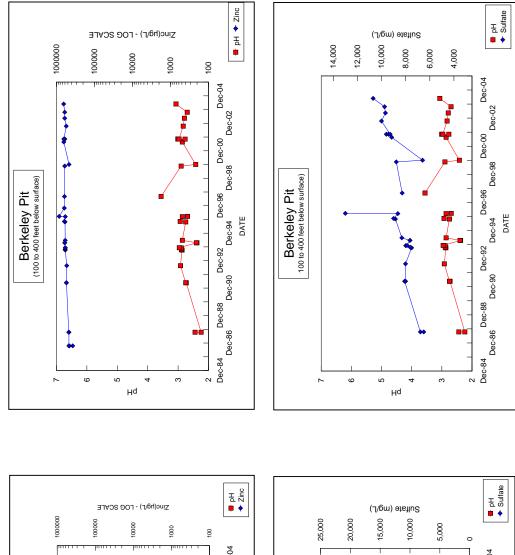
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Dec-84

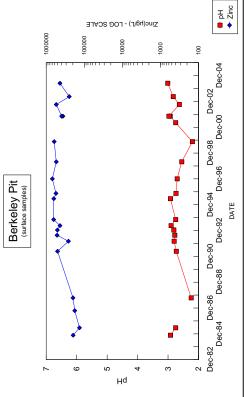
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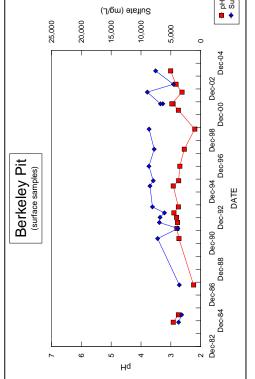
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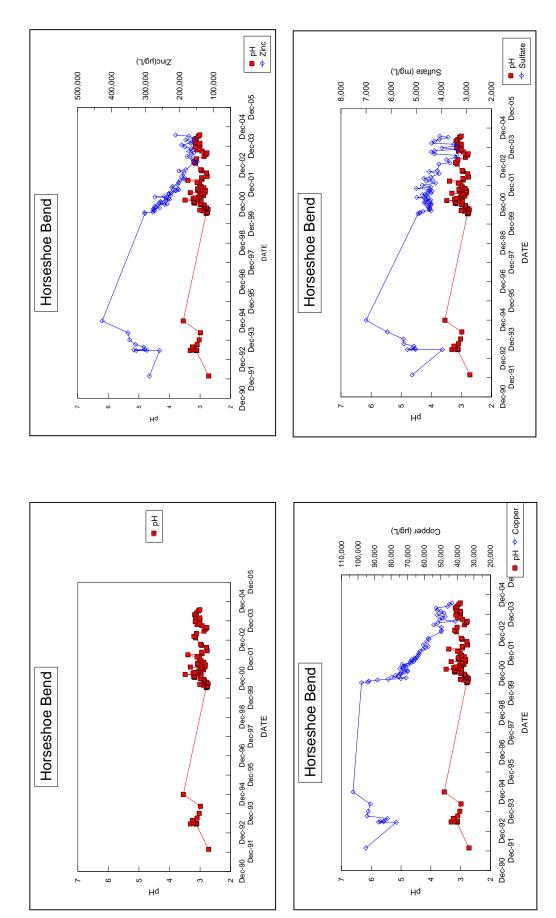
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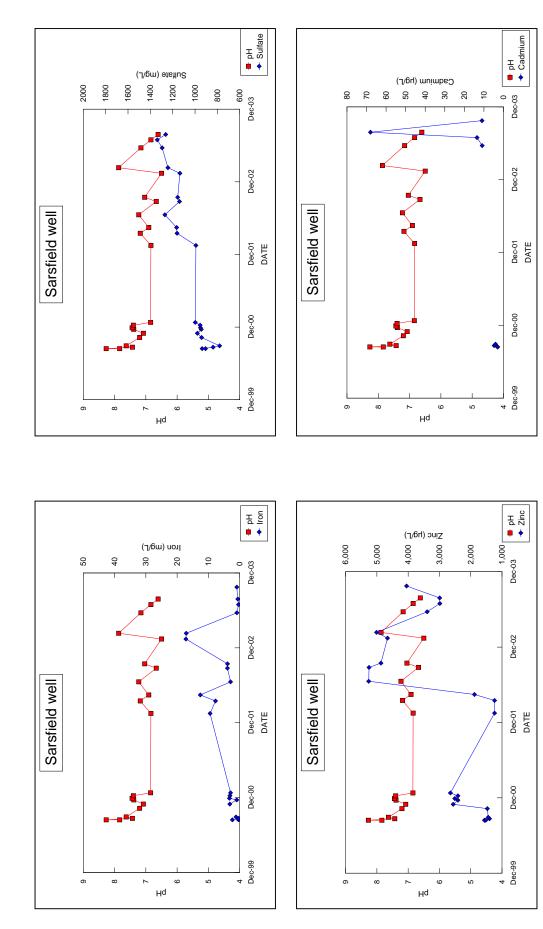


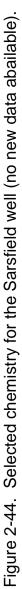












SECTION 3.0 WEST CAMP SYSTEM

Water-level monitoring continued during 2004 in the three mine shafts and six monitoring wells (fig. 3-1) that comprise the West Camp system. ARCO diverted the water pumped from the West Camp to the Lower Area One wetlands demonstration site during March 2002. Pumping occurred almost continuously, with pumping rates about ten percent higher than 2003; the increased pumping rate resulted in water levels declining slightly for the year.

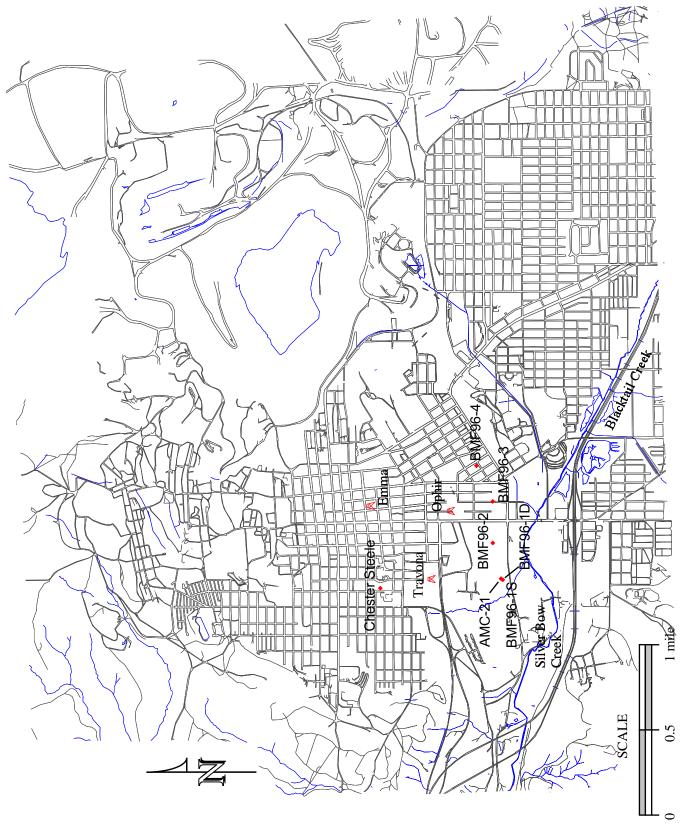
Section 3.1 West Camp Underground Mines

Water levels in the West Camp Mine system continue to be controlled by pumping facilities located at the BMF-96-1D and BMF-96-1S sites. ARCO had a special well drilled for dewatering (pumping) purposes in the fall of 1997. This well is referred to as the West Camp Pumping Well (WCPW). Pumping activities were transferred from the Travona Mine to this site on October 23, 1998. The pump and pipeline at the Travona Mine were left intact, however, allowing it to serve as a backup pumping system.

The West Camp pumping system operated almost continuously during 2004, with the exception of several short periods caused by power outages and for maintenance. However, the pumping rates were greater than those of 2002 and 2003. A total of 254 acre-feet of water was pumped in 2004, compared to 231 acre-feet in 2003, and 247 acre-feet in 2002. Table 3.1.1 shows the annual amount of water pumped in acre-feet on a yearly basis, percent change from the previous year, and the percent change from 1996 (the first full year of continuous pumping). Figure 3-2 shows the amount of water pumped annually and the percent of average annual precipitation since 1982.

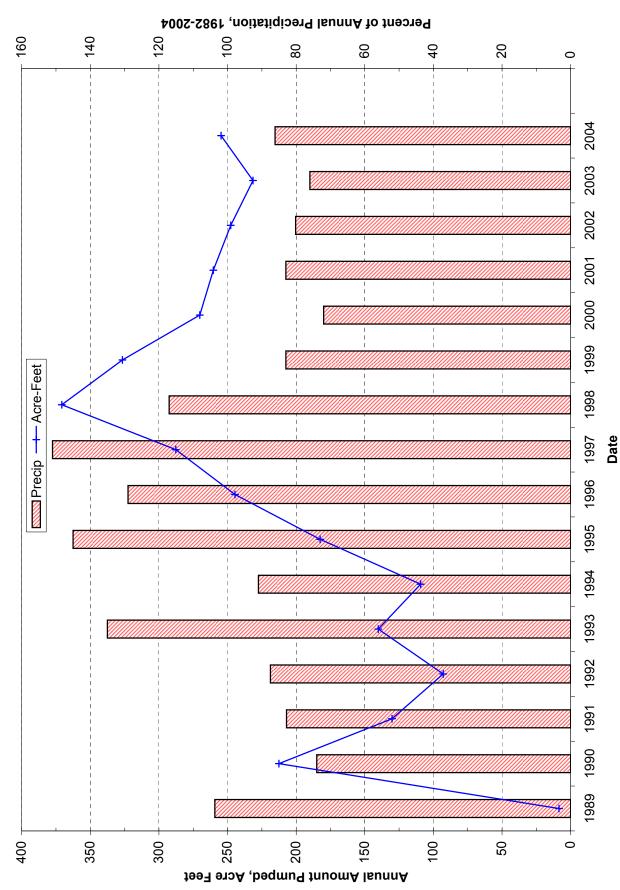
	Total Amount	Change From Prior	Percent Change
Year	Pumped (Acre ft)	Year (Acre ft)	From 1996
1989	8.50		
1990	212.54	+204.04	
1991	130.16	-82.38	
1992	92.82	-37.34	
1993	140.18	+47.36	
1994	109.31	-30.87	
1995	182.54	+73.23	
1996	244.56	+62.02	
1997	287.70	+43.14	118
1998	370.72	+83.02	152
1999	326.56	-44.16	134
2000	270.20	-56.36	110
2001	260.37	-9.83	106
2002	247.66	-12.71	101
2003	231.43	-16.23	95
2004	254.70	+23.26	104

Table 3.1.1 Annual quantity of water pumped from the West Camp, in acre-feet.









Water-level changes in the West Camp mines reflect changes in pumping rates in the WCPW. The increased pumping rate resulted in a net water-level decline between 0.72 foot and 1.06 feet in the West Camp mines for 2004 (table 3.1.2). (The Ophir Mine monitoring site was vandalized during October 2004, resulting in no water-level measurements being obtained during the last three months of the year. Water-level declines in the other West Camp mines were over 1.25 feet during this period; if similar changes occurred at the Ophir, its water level would have declined by an amount similar to the other mines.) Figure 3-3 shows annual water-level changes for the West Camp sites. Water levels are more than 10 feet below the West Camp action level of 5,435 feet stipulated in the 1994 ROD.

Water-level elevations for the three West Camp mines are shown on figure 3-4. Water levels in these mines are almost identical and continue to follow the trends of previous years. Pumping rates and the amount of water pumped are the most important controls on water levels.

Year	Travona	Emma	Ophir	Chester Steele	BMF 96-1D	BMF 96-1S	BMF 96-2	BMF 96-3	BMF 96-4
1982	4.30								
1983	2.00								
1984	55.90								
1985	61.90								
1986	36.10								
1987	49.70								
1988	15.69	14.20		16.42					
1989	5.67	6.60		1.79					
1990	-18.42	-18.66		-5.77					
1991	13.88	13.52		-8.28					
Total									
10-Year Change*	226.72	15.66		4.16					
1992	7.21	6.79		-11.20					
1993	1.01	0.93		-1.11					
1994	4.24	4.26	4.00	5.36					
1995	-0.98	-1.00	-0.96	12.72					
1996	-3.72	-3.76	-3.56	6.14	-1.50	-5.41	0.00	-2.85	
1997	7.29	7.28	7.22	14.82	7.20	7.36	2.13	-0.19	-0.80
1998	-7.31	-7.88	-7.20	-2.51	-7.35	-5.63	-2.00	-0.26	-5.88
1999	-0.97	-0.47	-1.03	-5.37	-0.82	-0.61	-1.15	-0.38	-1.76
2000	5.56	5.61	5.53	-4.64	5.70	1.45	-1.13	-0.07	1.86
2001	-1.65	-1.70	-1.52	15.61	-1.78	1.70	3.23	0.10	1.40
2002	1.33	1.74	1.51	6.35	2.03	-0.62	-2.06	-0.21	-0.93
2003	1.45	0.95	0.87	12.94	0.56	0.96	-0.01	0.00	0.54
2004	-1.06	-0.72	0.73*	-4.22	-0.72	1.03	1.41	0.33	-0.31
Total	000.45			~~~~			a 4 a	0.50	
Change*	239.12	2.69	5.59	36.35	3.32	0.23	0.42	-3.53	-5.88
Total water-level change is that measured. Access or obstructions occasionally prevent water-level measurements.									

 Table 3.1.2
 Annual water-level changes for the West Camp sites, in feet.

*Vandalism to Ophir Mine monitoring point resulted in no water levels being obtained for the last quarter of 2004.

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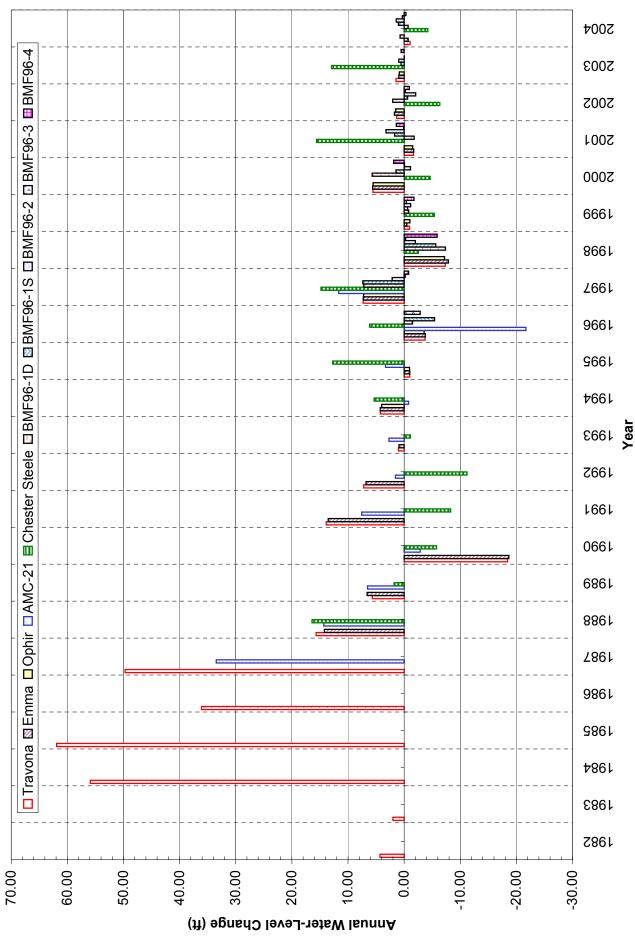


Figure 3-3. Annual water-level change for West Camp sites.

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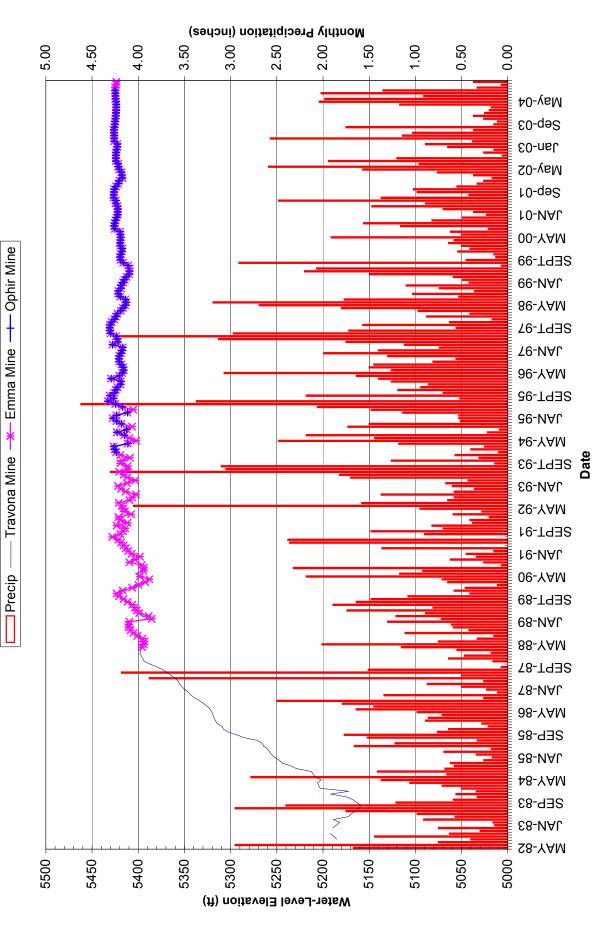


Figure 3-4. West Camp Mines water-level hydrograph and monthly precipitation totals.

Section 3.2 West Camp Monitoring Wells

Water levels declined in two of the five BMF96 West Camp wells, while rising in the other three wells during 2004. Well BMF96-1D, which was completed into the Travona Mine workings, had water-level changes (declines) similar to the West Camp mines. The water levels in wells BMF96-1S and BMF96-2 rose over 1 foot. These changes are shown in table 3.1.2 and on figure 3-3.

Figure 3-5 contains water-level hydrographs for wells BMF96-1D, BMF96-1S and BMF96-4. Water levels in wells BMF96-1D and BMF96-4 respond similarly to one another, reflecting the influence pumping has on the system. This is an important trend since well BMF96-4 was not completed into mine workings. It is, however, in the area of the historic 1960's flooding problems that led the Anaconda Company to install well AMC-21 for control of water levels in the West Camp. (See Duaime; et al, 1998 for a greater discussion of historic flooding problems in the West Camp System). There is a lag time between the responses seen in these two wells, which is most likely because well BMF96-4 was not completed into mine workings. During periods of continued water-level change in wells BMF96-1D and BMF96-4, there appears to be a similarity in water-level change in well BMF96-1S. Well BMF96-1S is located adjacent to well BMF96-1D, but was completed at a much shallower depth in the weathered bedrock of the Missoula Gulch drainage. This well also shows a response to pumping in the WCPW. There was no change in longer-term trends in any of these wells from those described in the previous reports.

Water levels in wells BMF96-2 and BMF96-3 are 20 to 50 feet higher than those in wells BMF96-1D and BMF96-4, and when plotted with the other BMF96 wells, initially appeared to show very little change (fig. 3-6). Since 2002, water levels in these two wells appear to follow trends similar to the other wells. When these wells are plotted separately (fig. 3-7a), there is considerable variation in monthly water levels, and water levels in both wells respond similarly. Monthly precipitation is shown on this figure and water levels are seen to respond very quickly to precipitation events. Although these wells were completed at depths of 175 feet below ground surface, their water levels are less than 20 feet below ground surface. Water-level trends during 2004 in these wells for the most part were similar to those seen the previous two years. Figure 3-7b is a hydrograph for these two wells for the period 2002-2004 to better show recent water-level changes. Water levels rise not only with precipitation, but with infiltration from snow melt, which is shown by the early season (March) water-level increases. During the last half of 2001, an unexplained water-level increase of several feet occurred in well BMF96-2; this was not seen in other wells. This trend did not continue in 2002; the water level in well BMF96-2 followed that of well BMF96-3 throughout 2003 and 2004.

Section 3.2.1 West Camp Mines and Monitoring Wells Water Quality

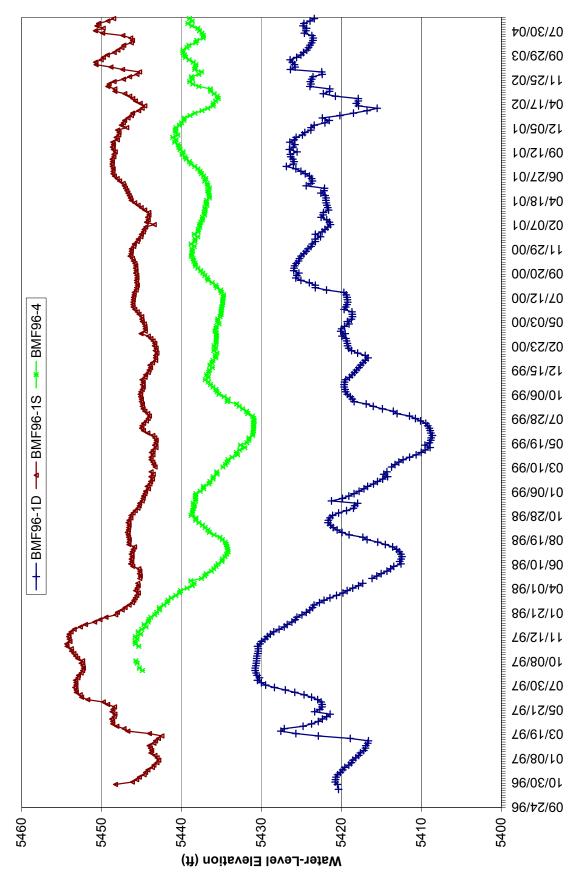
Although the workings are connected at several levels, there has been a notable difference in water quality between the Travona / BMF96-1D and Emma mines over the past several years. That difference appears to have diminished, if not disappeared in the last two years (fig. 3-8a and 3-8b) for several constituents. Most significant are the concentrations of sulfate and zinc. For example, there was little

change in the concentration of zinc in the Travona, but the concentration in the Emma shaft has decreased from about $40,000 \mu g/L$ to about $1,100 \mu g/L$ in 2 years. These changes in concentrations may well indicate a change in water flow directions within the workings, but the sample type and frequency do not permit such analyses.

The concentration of most dissolved metals in the Ophir Mine has remained relatively low and exhibited a slight downward trend through 2003 In particular, the trends of arsenic and sulfate concentrations have been slightly downward in the past few years and the trends continue with 2004 data (fig. 3-9). (No 2004 data available due to access problems.)

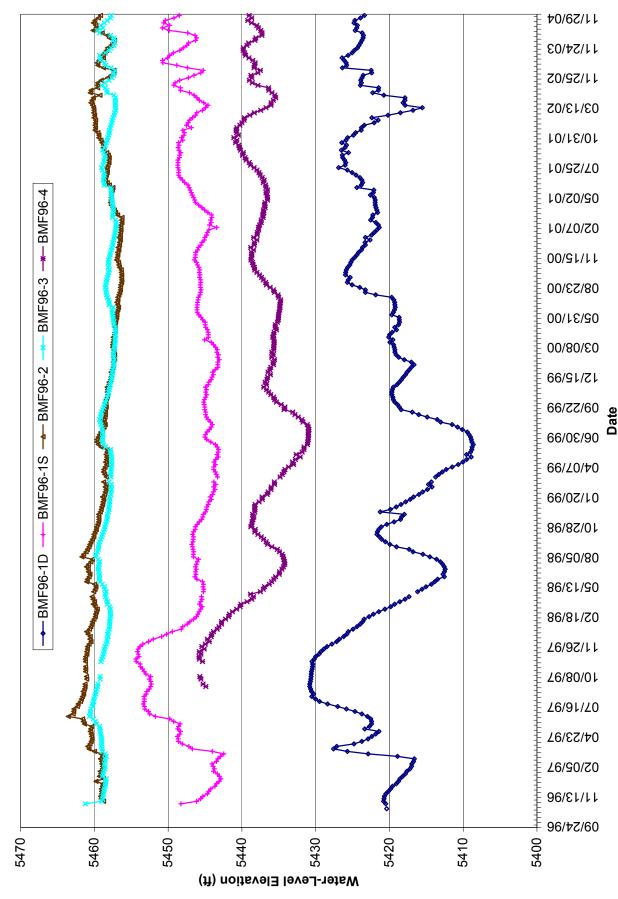
Water-quality data for the West Camp monitoring wells in 2004 are limited to BMF96-04; data for the period of record for all the wells is presented in figure 3-10a and b. The 2004 data appear to confirm a change in trend for several constituents, most notably temperature and pH. The reported field temperature has increased about 5^o Celsius over the past 5 years and is slightly higher than that of the Travona and Emma shafts. Similarly, the pH of the sampled water has increased to about 8.0, higher than that reported for the Travona or Emma shafts. As with the Travona and Emma shafts, these data indicate a significant change in the chemistry of the West Camp system that may be attributed to a change in ground-water flow conditions or some other influence. Additional analyses would require the collection of data not currently collected.

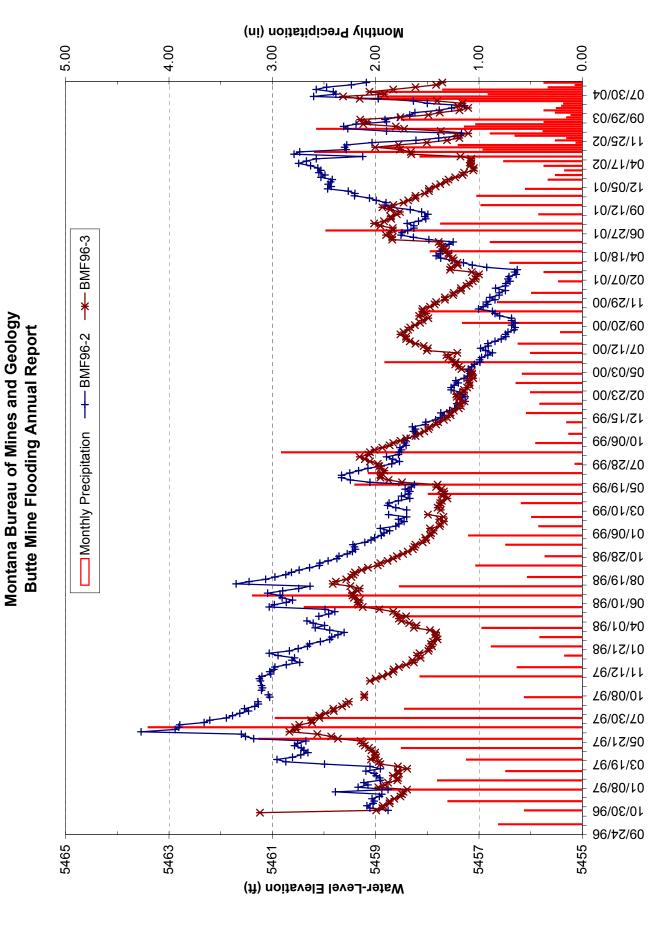




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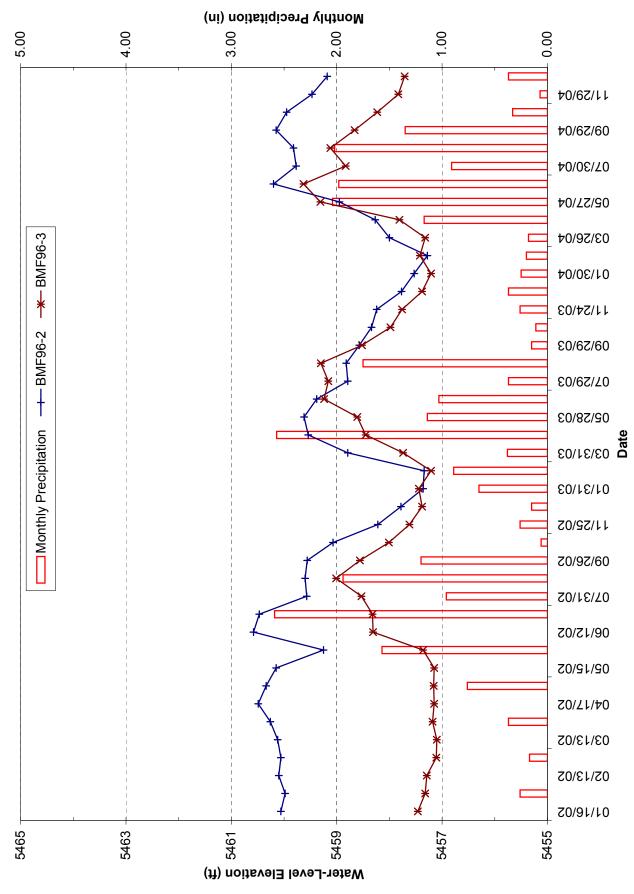


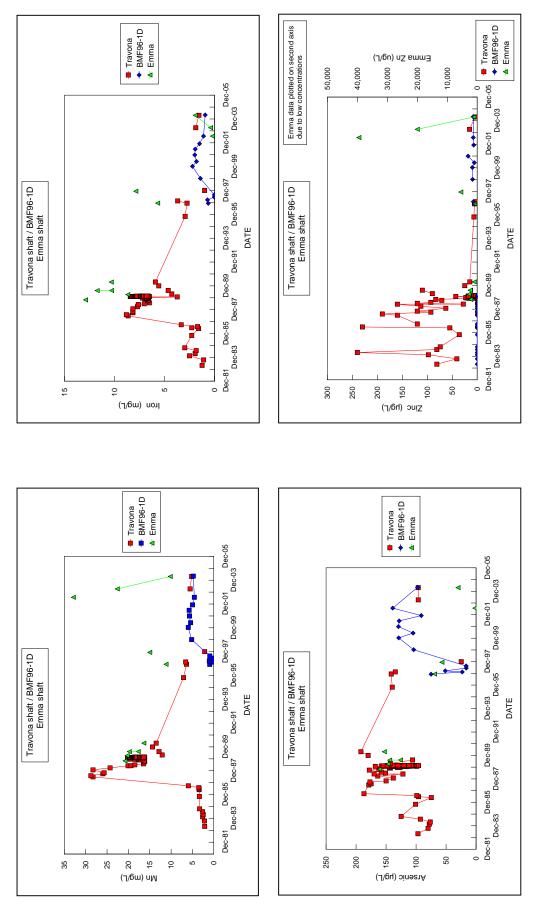


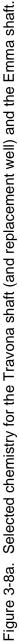


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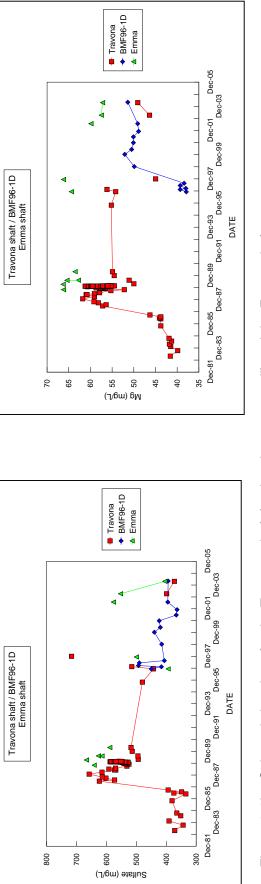
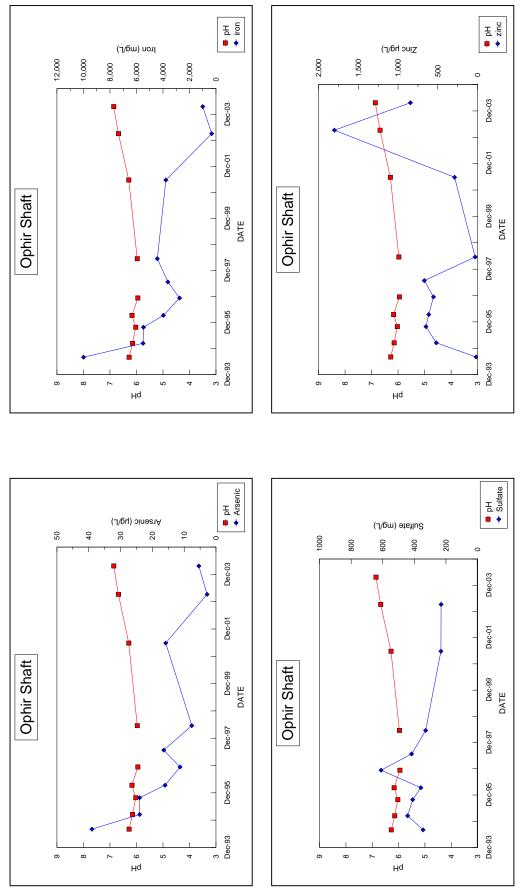
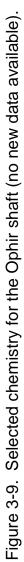


Figure 3-8b. Selected chemistry for the Travona shaft (and replacement well) and the Emma shaft.





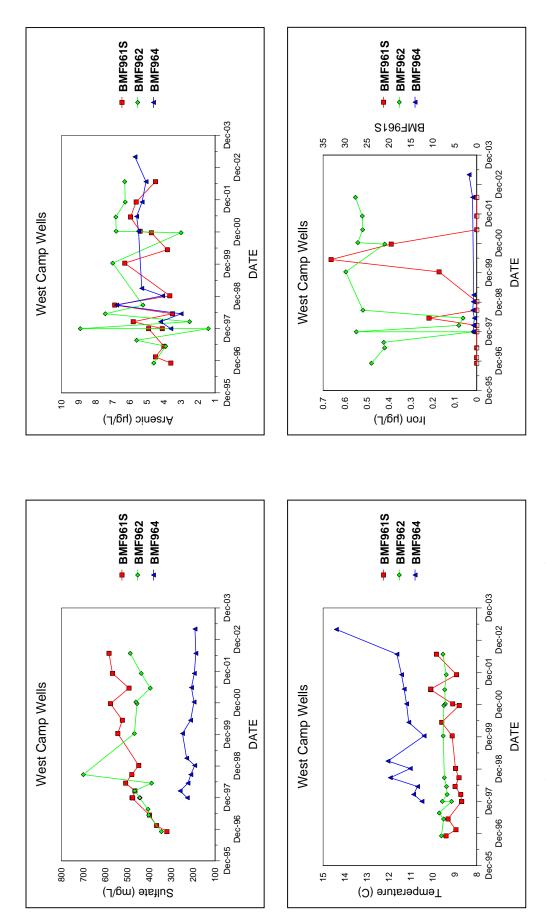


Figure 3-10a. Selected chemistry for the West Camp monitoring wells.

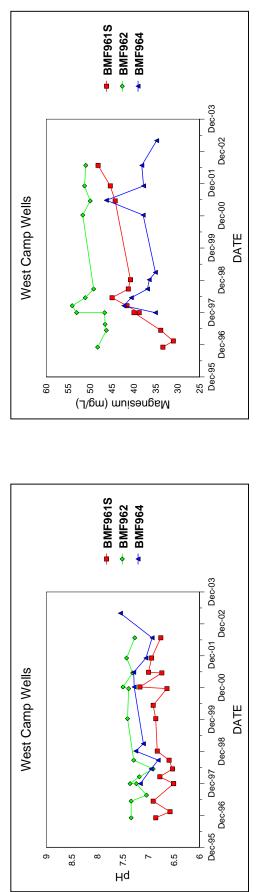


Figure 3-10b. Selected chemistry for the West Camp monitoring wells.

SECTION 4.0 OUTER CAMP SYSTEM

The Outer Camp System consists of the Orphan Boy Mine, Marget Ann Mine, well S-4 and the Montana Tech well (fig. 4-1). It is believed that water levels in the Outer Camp System are at or near pre-mining condition, as these mines had not operated for many years prior to ARCO's suspension of underground mining. It is also believed the few interconnections that existed between these mines and other Butte Hill mines had been sealed off decades earlier by the placement of bulkheads.

Section 4.1 Outer Camp System Water Levels

Outer Camp water levels rose in 2003 for the first time in 5 years; however, water levels declined in all but one site during 2004. Rehabilitation work at the Orphan Boy Mine the fall of 2004 resulted in limited water-level monitoring at this site. Table 4.1.1 contains yearly water-level change data, while figure 4-2 shows these changes graphically. The water-level change for the Orphan Boy Mine shown in Table 4.1.1 represents the total water-level change since the last water-level measurement obtained in June 1999.

Year	Orphan Boy	Marget Ann	Well S-4	MT Tech Well
1987	2.40			
1988	-1.10			
1989		-3.56	-3.56	
1990		-1.34	-4.23	
1991				
1992	1.41			
1993	5.49			0.36
1994	-0.72	4.66		2.51
1995	5.44	12.41		6.48
1996	-0.96	10.44	18.41	-1.47
Total				
10-Year Change	11.96	22.61	10.62	7.88
1997	7.56	14.50	16.42	7.76
1998	-2.79	0.59	2.17	-2.72
1999	-1.94	-2.87	-2.32	-1.57
2000	NA	-4.71	-4.08	-4.24
2001	NA	-1.49	-1.59	-1.79
2002	NA	-2.99	-3.13	-3.64
2003	NA	1.09	2.23	2.76
2004	-7.67	-2.18	-3.07	0.23
Total Change*	7.12	24.55	17.25	4.67

Table 4.1.1 Annual water-level changes for the Outer Camp sites, in feet.

Total water-level change is that measured. Access or obstructions occasionally prevent water-level measurements.

Figure 4-3 shows water levels for the Orphan Boy Mine and the Montana Tech well, along with monthly precipitation amounts. Water levels in the Montana Tech well showed a similar response to precipitation events as was seen in 2003 and prior years, rising in the spring and declining

throughout the winter. However, during 2003 and 2004 water levels continued to rise for a longer period into the fall and winter before starting to decline. Also during these two years, there was a net water-level rise in the Montana Tech well, following five years of decline.

Water levels in the Marget Ann Mine and well S-4 declined between 2 feet and 3 feet during 2004. Figure 4-4 shows water-level hydrographs for these two sites with monthly precipitation totals shown. Water levels from 1994 through 1998 showed a consistent increase regardless of precipitation amounts. From 1999 through 2002, water levels declined, with little apparent influence from precipitation. Water levels in the Marget Ann Mine and well S-4 increased throughout 2003. The initial 2003 water-level rise occurred shortly after a substantial amount of precipitation in the spring (April) of 2003 and continued to rise regardless of precipitation trends the remainder of the year. During 2004, water levels declined steadily throughout the year regardless of precipitation events.

No water-quality samples were collected during 2004 in the Outer Camp System.

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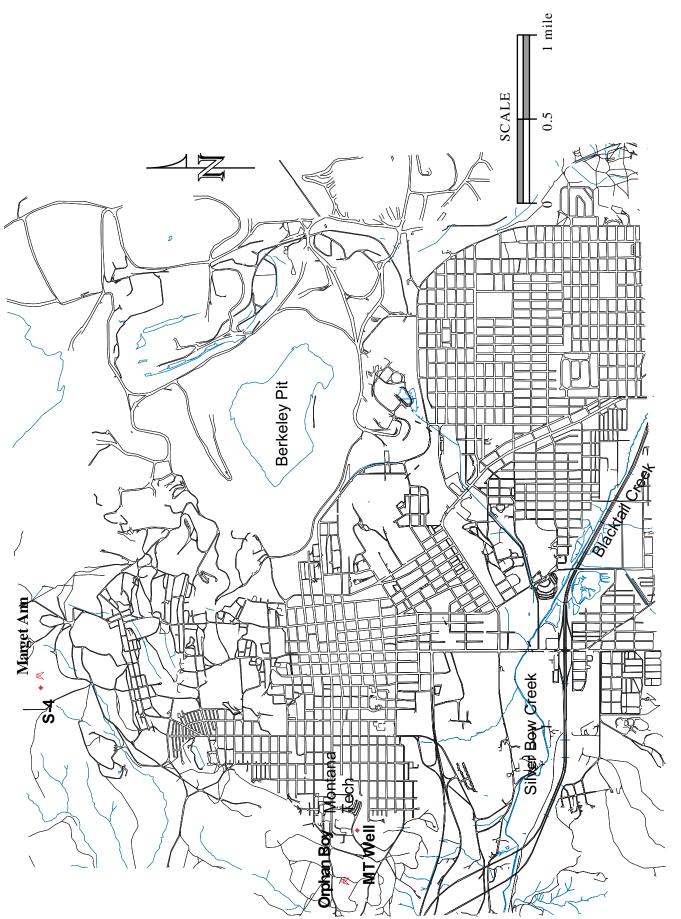
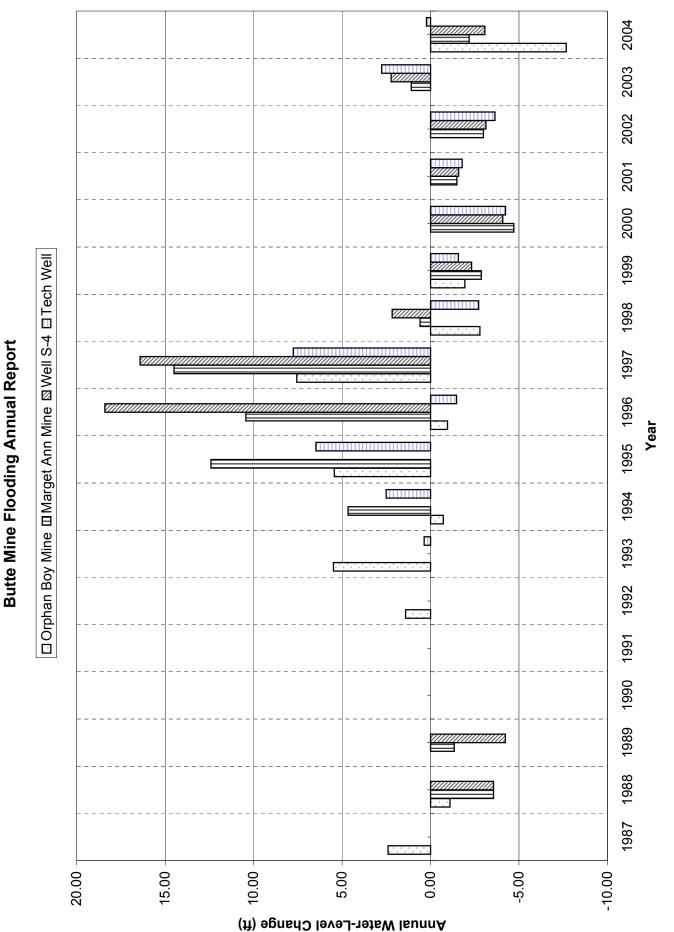
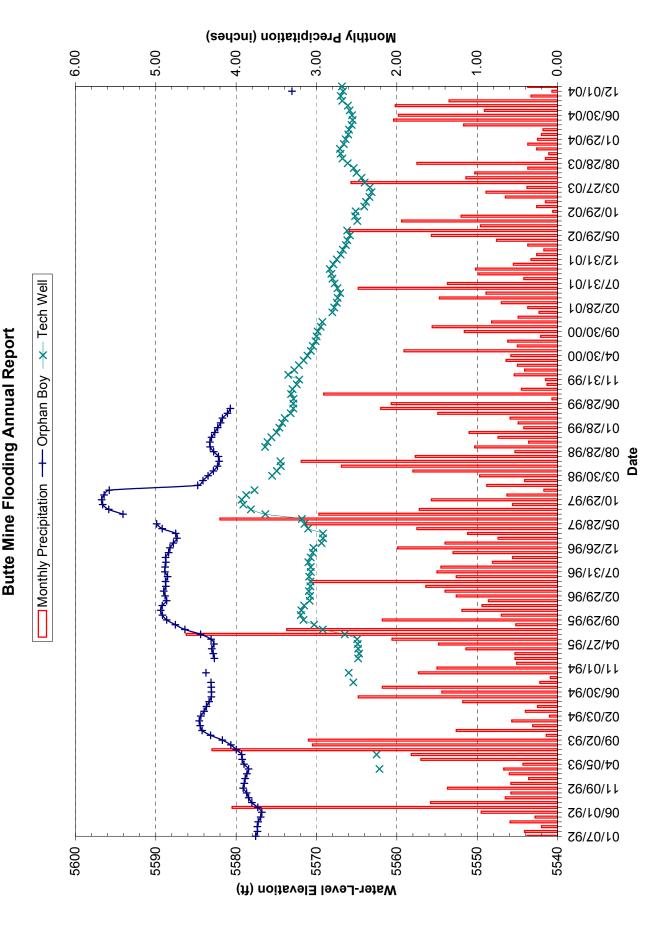


Figure 4-1. Outer Camp Monitoring Sites Location Map.



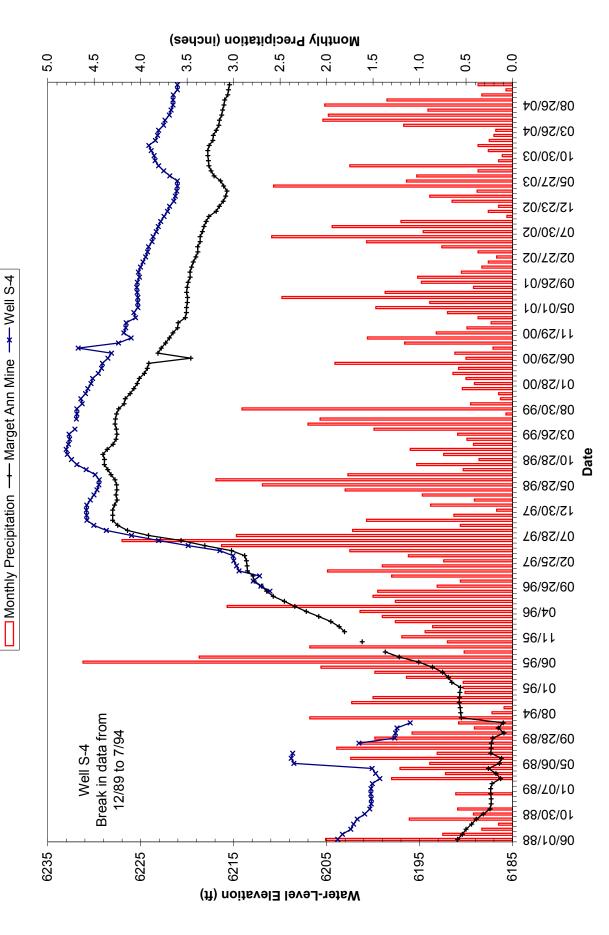
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Figure 4-2. Outer Camp sites annual water-level change.



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SECTION 5.0 MISCELLANEOUS WELLS

The locations of the miscellaneous monitoring wells are shown on figure 5-1. These sites consist of 11 shallow alluvial monitoring wells (MF) and two bedrock monitoring wells. Two of the alluvial wells have been damaged and are no longer being monitored. A third alluvial well (MF-4) was plugged and abandoned in 2001 to allow reclamation activities associated with Butte Priority Soils work. While the Hebgen Park and Parrott Park wells are both part of the monitoring program specified in the 2002 CD, the shallow alluvial wells (MF) are not; therefore, the frequency of monitoring was changed to quarterly in the MF wells.

Section 5.1 Miscellaneous Wells Water Levels

Water levels declined in six of the eight alluvial wells during 2004. Annual water-level changes are listed in Table 5.1.1. Total water-level changes since 1983 are less than 4 feet (up or down) in these wells.

Figures 5-2, 5-3, and 5-4 are water-level hydrographs for alluvial wells MF-1, MF-05, and MF-10, showing water-level elevations along with monthly precipitation totals. The reduced frequency of monitoring makes it a little harder to see all the responses to precipitation in 2003 and 2004. Water levels have historically responded to precipitation events very quickly in all of these wells. However, during 2004 water levels in wells MF-5 and MF-10 do not appear to have responded as dramatically to precipitation as in past years. Various construction and reclamation activities have taken place in the areas surrounding these wells as part of the HSB water-treatment plant discharge line that was installed adjacent to the historic Silver Bow Creek channel, currently referred to as the Metro Storm Drain (MSD), during 2003 and the French drain installed in the MSD as part of the Butte Priority Soils reclamation. Dewatering activities adjacent to and within the channel occurred from the summer of 2003 throughout 2004. Dewatering rates associated with the French Drain installation and operation have been between 300 and 500 gpm (Bourdin, 2005). It appears that these dewatering activities affected the water levels in the alluvial aguifer in the area. Water levels declined 1.5 feet to over 2.5 feet in wells near the MSD from May from 2003 through 2004. This decline is very noticeable in figures 5-3 and 5-4. According to contractors working on the MSD reclamation, dewatering rates varied from 400-500 gpm throughout 2004 (Archibald, 2005). This pumping rate would have a substantial influence on water levels in the alluvial aquifer adjacent to the MSD, as shown on figures 5-3 and 5-4.

Water-level responses in the Hebgen Park well (fig. 5-5) were similar to those seen in prior years. Water levels begin to rise during the late spring and continue through the fall, which coincides with both summer precipitation and lawn watering of the park. Precipitation, or the lack of, does not appear to influence water levels once they begin to rise in the spring. Since the water-level rise extends into the fall and early winter, it is probable that a portion of the increase in water level is due to lawn watering in addition to precipitation. The water level in this well decreased slightly during 2004, following the largest

increase in six years, which occurred in 2003. Since monitoring began at this site, water levels have increased over 3.5 feet.

Year	MF-1	MF-2	MF-3	MF-4	MF-5	MF-6	MF-7	MF-8	MF-9	MF-10	MF-11	Hebgen(1)	Parrott
1983	-0.24	-0.13	-0.64	-0.20	-0.09	-0.09	-0.93	0.53	-0.65	-0.41	-0.59		
1984	1.02	-0.09	-0.03	0.89	-0.25	-0.14	0.37	0.09	-0.28	0.57	-0.23		
1985	-1.00	-0.02	0.19	-0.21	-0.33	0.59	-1.17	-0.01	-0.10	-0.60	-0.29		
1986	0.00	0.10	0.22	0.29	0.40	0.08	1.01	0.13	-0.10	0.00	-0.35		
1987	-0.12	-0.05	-0.37	-0.88	-0.10	-0.99	-0.01	-0.03	-0.41	-0.11	0.45		
1988	-0.54	-0.05	0.08	0.38	-0.18	-0.13	-0.01	-0.05	0.17	0.01	-0.31	1.54	1.43
1989	0.34	0.18	0.20	0.38	0.86	0.24	0.10	0.08	0.21	0.03	0.13	-2.18	0.42
1990	0.09	0.13	0.26	0.08	0.10	0.14	0.16	0.14	-0.01	0.15	1.17	-1.90	5.23
1991	0.16	0.13	0.19	0.79	0.03	0.00	-0.13	0.52	0.84	2.15	-0.84	3.09	-6.10
1992	-0.18	-0.06	-0.12	-0.68	-0.47	0.00	-0.69	-0.50	-0.65	-1.94	-0.31	-1.40	0.63
Total									-0				
10-Year Change*	-0.47	0.14	-0.02	0.84	-0.03	-0.30	-1.30	0.90	-0.98	-0.15	-1.17	-0.85	1.61
1993	0.13	0.06	0.13	0.77	0.60	0.00	0.13	0.20	0.38	0.07	0.52	6.27	1.39
1994	-0.06	-0.02	0.21	-0.11	0.15	0.00	0.31	0.07	-0.22	0.00	0.03	-0.25	5.96
1995	-0.10	-0.01	-0.99	0.32	0.66	0.00	0.46	0.05	-0.78	0.12	0.03	Na	2.67
1996	0.16	0.15	1.12	-0.01	0.27	0.00	0.22	-0.81	0.81	0.22	-0.70	2.75	-1.50
1997	0.05	0.16	-0.89	0.20	0.35	0.00	0.00	0.90	1.92	0.30	1.17	4.22	4.75
1998	0.65	P&A	0.46	-0.04	-0.04	P&A	0.28	0.34	-1.87	0.16	0.10	-0.62	-0.33
1999	-0.21	P&A	0.05	-0.79	-0.91	P&A	-0.33	-0.48	0.06	-0.45	-0.42	-2.93	-5.34
2000	-0.26	P&A	-0.14	-0.54	-1.01	P&A	-0.36	-0.25	-0.60	-0.24	-0.52	-6.07	1.50
2001	0.03	P&A	0.03	0.45	-0.15	P&A	0.08	-0.06	0.09	0.10	-0.12	0.37	5.47
2002	0.16	P&A	0.07	P&A	-0.15	P&A	-0.21	0.70	-0.15	-0.07	-0.18	-0.41	-3.27
2003	-1.08	P&A	-2.13	P&A	-0.76	P&A	-1.77	-2.67	-0.85	-1.63	-0.51	1.25	3.52
2004	1.31	P&A	0.24	P&A	-1.06	P&A	-1.18	-0.15	-0.29	-0.23	-0.58	-0.12	-1.12
Total													
Change*	0.31	0.48	-1.86	1.09	-2.08	-0.30	-3.67	-1.26	-2.48	-1.80	-2.35	3.61	15.31

Table 5.1.1Annual water-level change for miscellaneous wells, in feet.

(1) Hebgen Park Well - No data from 06-1992 to 01-1993, 01-1995 to 09-1996, and 01-1998 to 01-1999.

(*)Total water-level change is that measured. Access or obstructions occasionally prevent water-level measurements.

Na- no access.

P&A- well plugged and abandoned.

The water-level hydrograph for the Parrott Park well is shown on figure 5-6, along with monthly precipitation totals. Water levels declined during most of 2002 before leveling off and rising during December of 2002. The 2003 water levels and trends were similar to those of 2000 and 2001; however 2004 water levels did not show the same level of response to precipitation. Water levels rose slightly in July before declining through the rest of the summer and early fall. Water levels then rose almost 3.5 feet the last two months of the year; however, there was a net decline of 1-foot for 2004. The rise that occurred the last 2 months of 2004 is not related to either precipitation events or lawn irrigation. Figure 5-7 is a water-level hydrograph for both the Parrott and Hebgen Park wells which shows the recent water-level trends. The water-level increase seen in the Parrott well coincides with a water-level decline in the Hebgen well. No water-quality samples are collected from any of these miscellaneous monitoring sites.

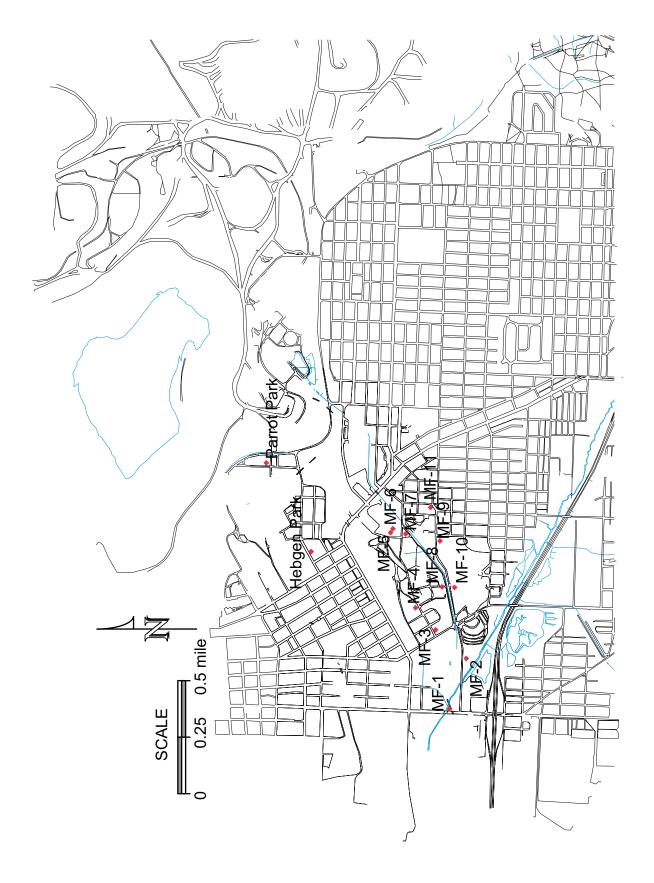
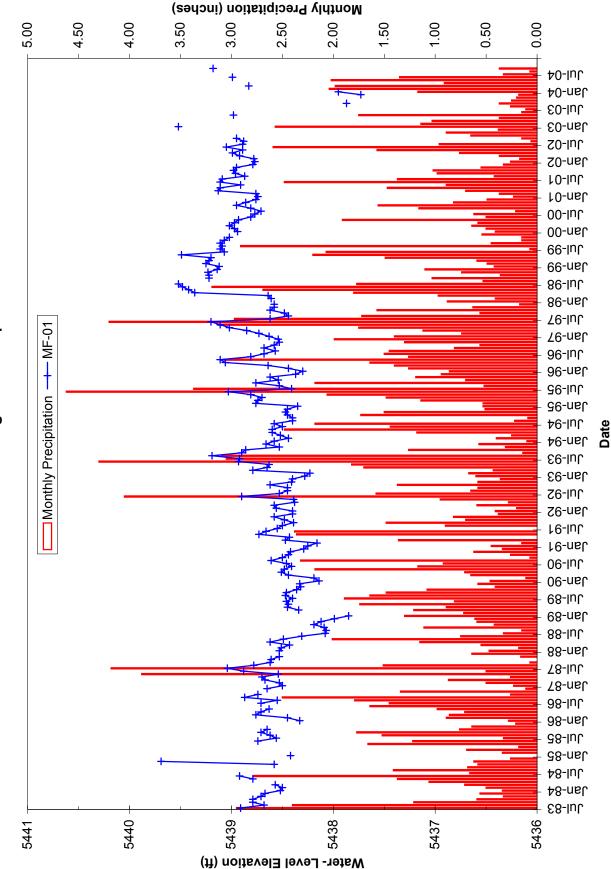


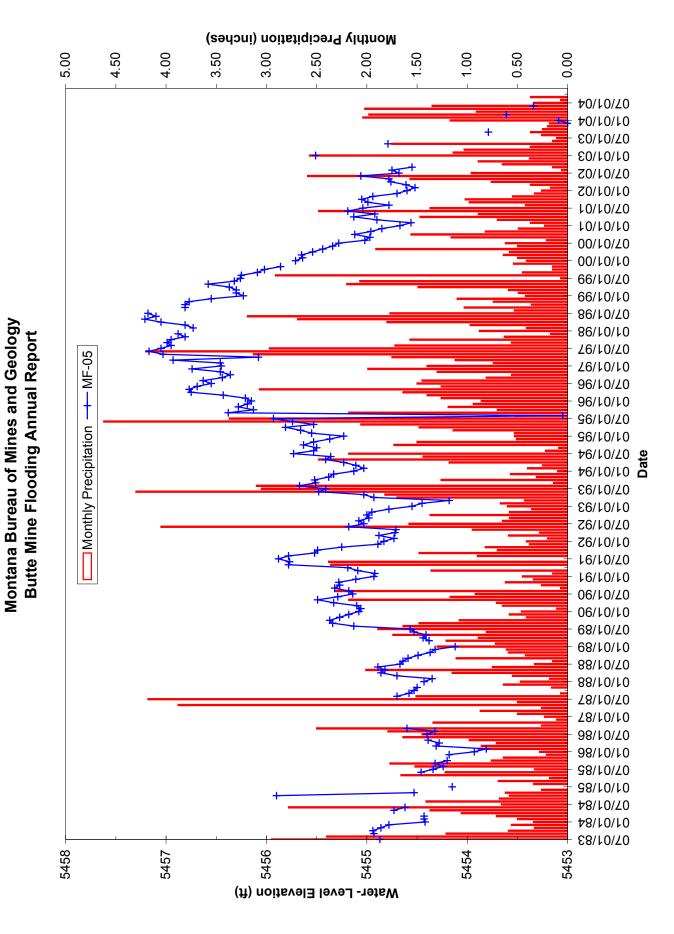
Figure 5-1. Miscellaneous monitoring wells location map.



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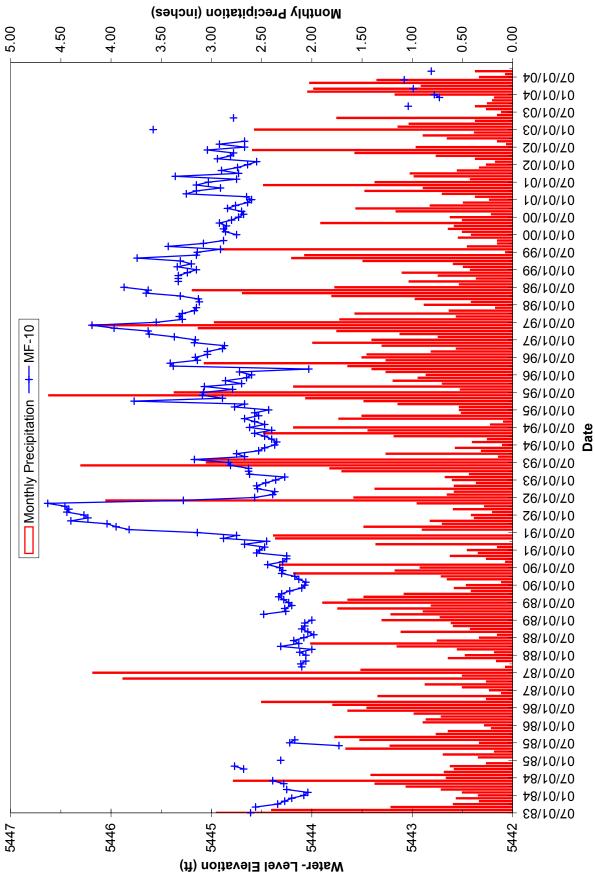
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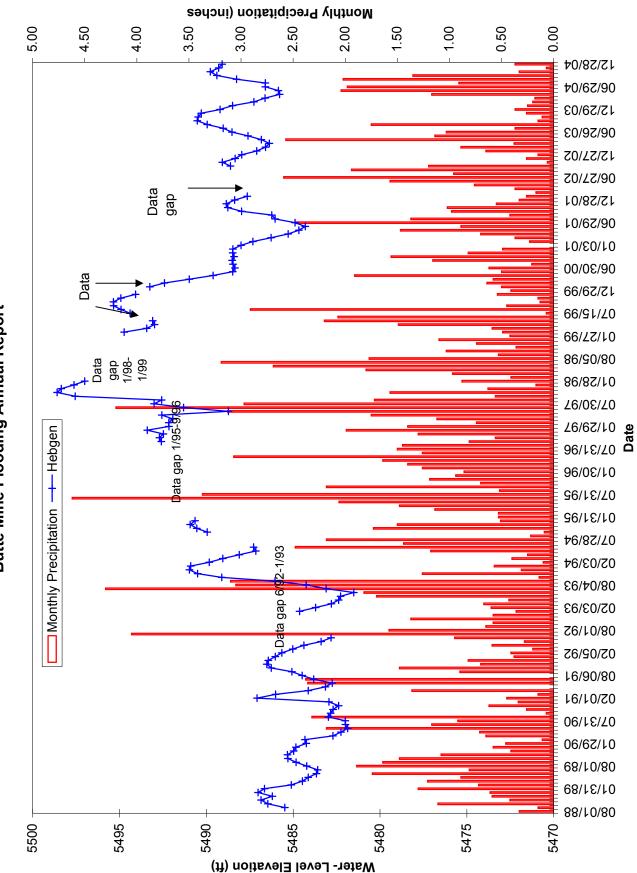
Figure 5-2. Water-level hydrograph for MF-01 well.











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Figure 5-5. Water-level hydrograph for the Hebgen Park Well.

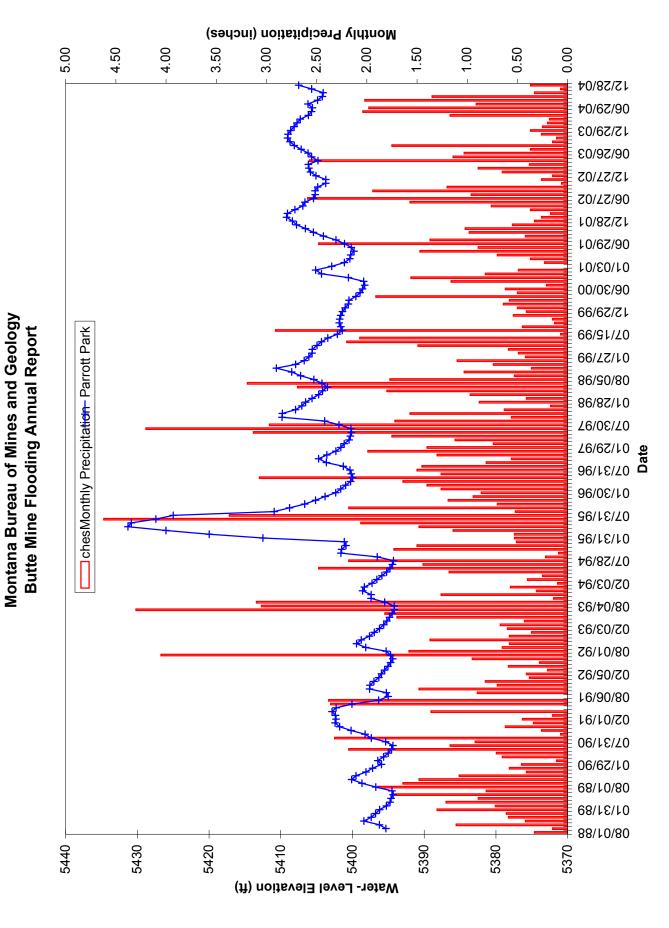
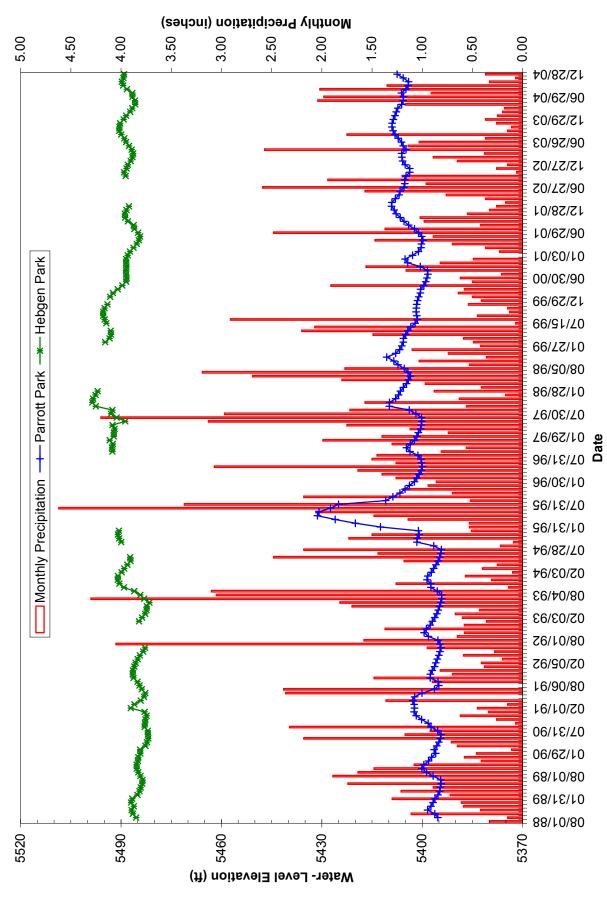


Figure 5-6. Water-level hydrograph for Parrott Park well.





SECTION 6.0 REVIEW OF THE BERKELEY PIT MODEL

MR updated the Berkeley Pit water-level model based upon actual 2004 water-level measurements and HSB flows as measured in the water-treatment plant. The model incorporates monthly water-level rise information from July 1996 through December 2004.

Based upon the 2004 model update, it was projected that the critical water level (CWL) of 5,410 feet will be reached at the Anselmo Mine in December 2020, 30 months later than predicted in the 2002 model (June 2018) (Czehura, 2005). The model update assumed the surface water inputs from storm water diversions in the Kelley Mine area, the addition of sludge from the HSB water-treatment plant, and previous models infilling rates adjusted for the diversion of HSB water away from the pit. The HSB drainage water that was draining to the pit from June 2000 through November 17, 2003 is now being diverted to the HSB water-treatment plant and is being used in MR's mining process for make-up water in the concentrator facility.

The treatment technology and plant-construction time frame for Berkeley Pit water are based upon the schedule listed in the EPA 1994 ROD, and included in the 2002 CD for the Butte Mine Flooding Operable Unit (EPA, 1994). Based upon the current water-level projections, a review of the HSB treatment plant design and operation would begin in December 2016. Any necessary upgrades would have to be completed by December 2018 (Czehura, 2005).

SECTION 7.0 CONCLUSIONS AND SUMMARY

Water-level trends in the alluvial monitoring system were different than those noted in last year's report and were more in-line with previous year's trends at a number of the monitored sites. An increase in water levels occurred in a majority of the alluvial wells north of the Pittsmont Waste Dump while water levels decreased in almost all the alluvial wells south of the dump during 2004.

Precipitation events still have little or no influence on water levels in the LP-series alluvial wells near the Berkeley Pit and leach pads. Water-level variations in these wells have a greater response to mining activities than precipitation events.

Water levels in a majority of the alluvial monitoring wells located outside the mine area show a response to seasonal precipitation events. The response time varies from immediate to a-2 to 3-month lag time. The decrease in annual precipitation in the Butte Basin since 1999 was considered a good explanation for the overall water-level decrease seen in a number of monitoring wells; however, water levels increased in all of these wells (AMC and GS series) in 2003, before decreasing again in 2004. The 2003 water-level increase occurred although precipitation levels were less than previous years. The increases were greater in wells nearest the mine site and water levels rose the most from late summer through the remainder of the year. While this period of time coincides with MR's mine start-up activities, no direct link was found between start-up activities and water-level changes. However, a relationship between filling of the MR concentrator Ecology/Emergency Pond and water-level increases in several

in several AMC wells was apparent. Water-level declines in 2004 were consistent in the alluvial monitoring network with the exception of wells north of the Pittsmont Waste Dump. It appears that reactivation of a portion of the leach pad system by MR had a direct influence on water levels in the alluvial system down-gradient of the leach pads.

The increased water-level changes in the East Camp bedrock system are independent of precipitation, and are a result of the cessation of long-term mine dewatering activities in 1982. No notable precipitation influence was seen in any of the bedrock wells or underground mines water levels. However, the diversion of HSB drainage water away from the Berkeley Pit did have an influence on East Camp bedrock water levels. The water-level rise for 2004 was about 60% that of 2003 and 2002.

The date the East Camp system water level was predicted to reach the CWL elevation of 5,410 feet was changed from June 2018 to December 2020, or 30 months later than that predicted in 2003. The CWL date is assumed to be the date the 5,410-foot elevation would be reached at the Anselmo Mine. The Anselmo Mine is the anticipated compliance point in order to keep the Berkeley Pit the lowest point in the East Camp bedrock-mine system. This will ensure that all water in the historic underground mine system will continue to flow towards the Berkeley Pit.

The pumping of ground water in the West Camp System continues to control water levels in this system. The volume of water pumped during 2004 was 14% more than 2003; thus, water levels decreased about 1 ft throughout this system and are now over 10 ft below the maximum-allowable level.

Monitoring wells in the alluvial aquifers associated with the Mine Flooding Operable Unit continue to show a wide range of water-quality concentrations, both spatially and temporally. As is the case for the last few years, the AMC-series wells show a wide variation and few trends with respect to the concentration of dissolved constituents. The LP-series wells show a continuation of recent trends in most wells for most constituents.

In several cases, chemistry data from the East Camp mines show a strong departure from previous trends, particularly with respect to iron concentrations. What was possibly a sampling or analytical problem is likely a real change in the chemistry of water in the underground workings.

Recent data from the West Camp monitoring sites generally indicate a continuation of recent trends in water quality. Although the concentrations of several dissolved constituents trend upward, they are generally well below values observed during initial flooding. Data from the Emma shaft continue to show departure from recent trends and a notable difference in water quality compared to the Travona Mine.

Results of the 2004 monitoring program continue to show that the current monitoring (water-level and water-quality) is adequate for ensuring that contaminated bedrock ground water is flowing into the Berkeley Pit, and that West Camp water levels are being sufficiently controlled by West Camp pumping operations. These are two of the main environmental concerns associated with the flooding of Butte's historic underground mines and the Berkeley Pit.

Acknowledgments

The information contained in this report represents the work of many companies and agencies over the past 23 years. Numerous individuals have been responsible for actual data collection. Their dedication and creativity in monitoring and sampling of mine waters provided the information that all future work and evaluations relied upon.

The State of Montana, Department of Environmental Quality and the U.S. Environmental Protection cy have provided funding for the MBMG to conduct monitoring and sampling activities and preserve continuity between various studies. This support has been invaluable; their realization that flexibility is needed in the monitoring program has allowed modifications in monitoring as conditions change.

The continued cooperation of Montana Resources and British Petroleum/Atlantic Richfield Company is greatly appreciated, while representatives of New Butte Mining and Montana Mining Properties continue to allow access to their properties for monitoring purposes.

Special recognition is given to Mike Kerschen and James Rose, MBMG, for their dedication to monitoring and sampling tasks, and to Peggy Delaney, MBMG, for assisting with the preparation of this report.

Errors and omissions remain the authors' responsibility.

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