

TECHNICAL MEMO

TO: Resolution Copper – Groundwater Modeling Workgroup

FROM: WSP – Gustavo Meza-Cuadra & Doug Oliver

SUBJECT: Responses to Regional Model Queries

DATE: February 13, 2018

Following the Resolution Copper Groundwater Modeling Workgroup held on January 16th, SWCA forwarded an email communication detailing the questions from the U.S. EPA on January 25th (email provided in Appendix A). This memo provides responses to EPA's comments and supporting information.

Questions and Responses

Item #2: Quantify the flow out from Drain (DRN) cells within the reaches of the model and compare these values to the enchanced recharge applied in the stream reach.

EPA comment: These figures depict a losing surface water system (i.e. groundwater levels lower than streambed, recharge magnitudes larger than discharge values, net downward flow). We know this to be true about most arid systems a priori. We also know that hydrologic timing is extremely important to GDEs, but that information is not available from this type of graphical depiction.

What time-period(s) are depicted here? Are these averaged values?

Response: Areal recharge rates shown in Figure A-1 of WSP's January 9th memo are steady state. Drain discharge rates shown in Figure A-2 are from the final stress period of the calibration period (EOY 2016).

• Consider providing a timeseries or table of both recharge and discharge, and qualitatively analyzing the reasonableness the relative timing of both processes.

Response: Table A presents drain discharge rates for the period 1998-2016 parsed out for each stream reach (see Figure A for reach location numbering corresponding to numbers in Table A). As mentioned above, recharge is steady state, but drain discharge rates are not. However, because recharge is steady state, most of the discharge flows are also relatively constant through time.

Item #4: Present the calibration contours at the end of the calibration period (EOY 2016)

EPA comment: I interpreted this question to be a request for more of a "residual heatmap" of calibration errors. It appears that WSP provided a head contour of the calibrated model. Both would are useful...consider contouring RMSE and presenting a figure.

Response: Figure B is a heatmap of the calibration errors for the targets in the Apache Leap Tuff. The circle diameter is proportional to the magnitude of errors with blue representing overestimates (modeled heads



greater than measured values) and red representing underestimates (modeled heads lower than measured values).

<u>Item #5: Present a figure with the gaining reaches (i.e., flows to DRN cells), in Devils Canyon, versus the measured flows from surveys conducted by M&A.</u>

EPA comment: It does not appear that WSP has fully addressed this issue. Figures A-1, A-2, A-3 show model recharge boundary conditions, and modeled flows, as well as overlaid perennial reaches. #5 is more akin to a residual analysis where modeled flow volumes and fluxes were compared to observed data.

- How do modeled discharges compare to observed values?
 - o Is there adequate data to answer this question?
 - For cases where most of the GW discharge is likely being consumed by ET, riparan veg cover may act as a proxy
- Spatially, the areas of highest drain flow do not correspond very well with M&A's continuously saturated reaches. This is problematic considering that actual in-stream flow "is expected to be only a fraction of the quantity discharging to the drains."
 - o By extension, even where drain flows are non-zero and the area is mapped as a perennial reach, the drain flow would have to be much higher than the observed base flow to maintain perennial flow. Are the modeled flows high enough--given the other "built-in" losses--to support base flow in reaches where drain flows and perennial reaches overlap?

Response: Data from the Surface Water Baseline Addendum: Upper Queen Creek, Devils Canyon, and Mineral Creek Watersheds (M&A, 2017) were compared to model-predicted values. M&A has performed occurrence surveys along Devils Canyon since 2003 to identify the presence of water. Continuously saturated reaches were identified between DC 9.1 and DC 7.5 and between DC 6.1 and DC 5.4 (distances are in kilometers upstream of the confluence with Mineral Creek). These reaches are supported by groundwater discharge from the Apache Leap Tuff. Within these two reaches, two monitoring locations have a relatively long and continuous record: DC 8.8 (2004-2016; ~3.5 years missing) and DC 5.5 (2003-2016; ~1.5 years missing). Data from these locations have been evaluated to identify base flow. Figure C shows the measurement points and the continuously saturated reaches as well as the drain cells within the model representing the creek.

Flows from the DRN output in the model were compared to the measured base flow for monitoring stations DC 8.8 and DC 5.5. See the table below for comparison. The median daily base flow (for the entire period of record) for DC 8.8 was 118 gpm (0.264 cfs), and compares favorably with the model-predicted discharge for drain cells in this reach, which sum to 164 gpm. The median daily base flow (for the entire period of record) for DC 5.5 was 39 gpm (0.088 cfs) and compares favorably with the model-predicted discharge for drain cells in reach 97, which sum to 45 gpm. The drains also implicitly represent evapotranspiration, so should be greater than the measured flow values. Because the groundwater model is using steady-state recharge, seasonal variations are not simulated.

Monitoring station	DC 5.5	DC 8.8
Median daily base flow (gpm)	39	118
Model Reach #	97	98
Predicted drain flow (gpm)	45	164

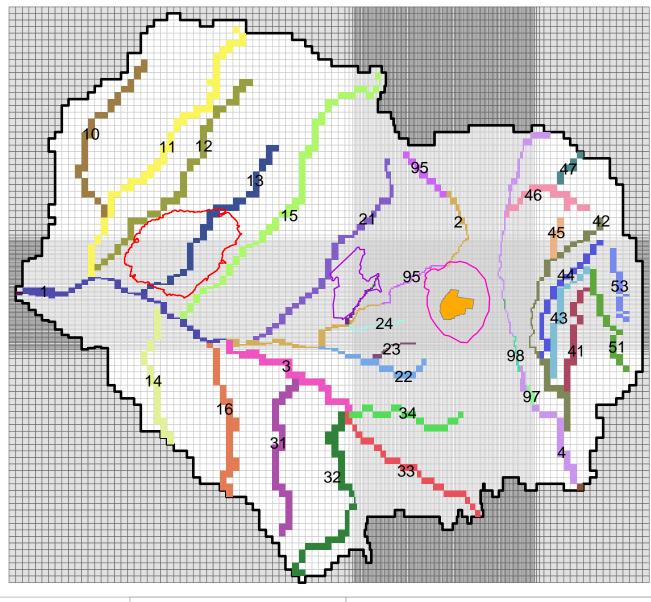


<u>Item 6: Present the steady state water balance at the beginning of the historical model (stress period 1) representing pre-1910 conditions (before mine dewatering commenced).</u>

EPA comment: It appears that in the steady-state run, recharge is balanced by discharge from drains.

- Are the drains in the #6 Table the same drains that are active during the 2016 period?
 - o Drains were added to simulate mine workings, so presumably drain flows would have increased, but Response #1 Table for the 2016 period has a slightly lower drain outflow flux.

Response: The drains used to simulate discharge to surface streams pre-1910 (listed in the table under response 6 of WSP's January 9th memo) are the same as those used at the end of the historical model at EOY 2016 (listed in the table under response 1 of the January 9th memo). Flow to the underground workings was modeled with the Fractured Well (FWL) package, so is not combined with the drain flows shown. As a result, drain flow rates are lower at EOY 2016 (1,115 gpm) relative to pre-1910 (1,325 gpm) because water levels were reduced by dewatering from 1910 to 2016 and no additional dewatering flows are included in these numbers (dewatering reported separately).





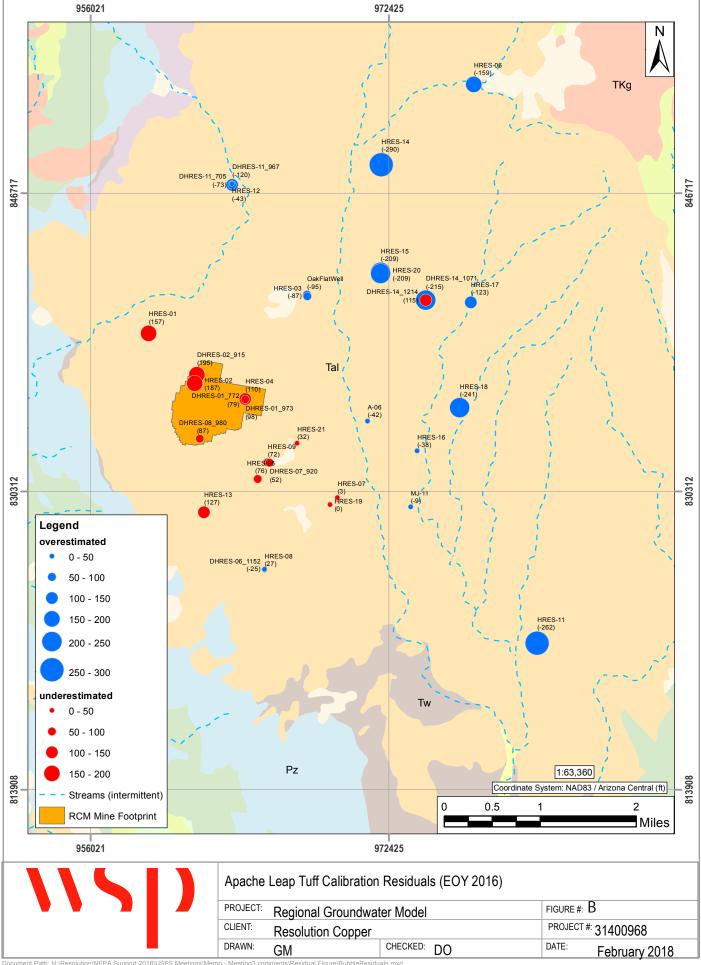
0 0.5 1 2 3 Miles

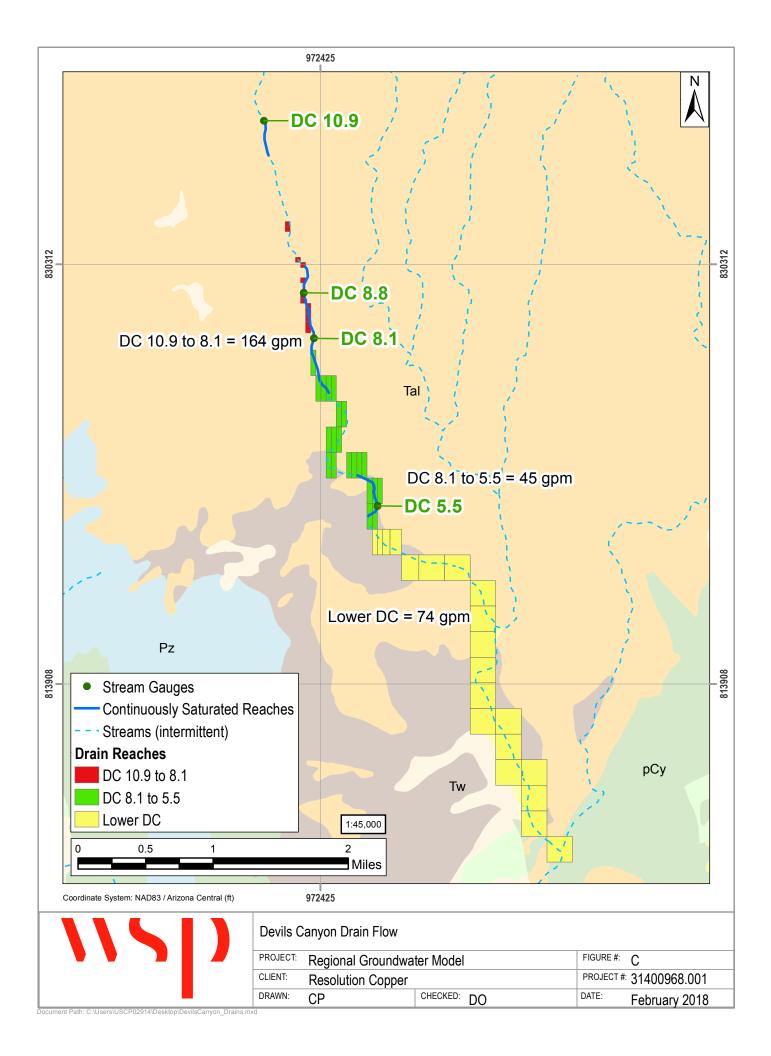
Coordinate System: NAD 1983 2011 StatePlane Arizona Central FIPS 0202 Ft IntlTransverse Mercator



Model Drain Reaches

PROJECT	Regional Groundwa	FIGURE #:	Α	
CLIENT:	Resolution Copper		PROJECT #	31400968
DRAWN:	CDM	CHECKED: GM	DATE:	February 2018





	1	2	3	4	5	10	11	12	13	14	15	16	21	22	24	25	31	32	33 34	42	51	95	97 98
Time (d) Date	Lower Queen Creel	Upper Queen Cree	Arnett Creek	Devils Canyon		Millsite Canyo	Hewitt Canyon Ro	blas Canyon	Bear Tank Canyon	Reymert Wasi	Potts-Whitford Car	nyor Alamo Car	nyor Silver King Wa	sl Pacific Cany	or Cross Canyor	Superior Was	Telegraph Canyor W	ood Canyor	Upper Arnett Cree Kane Spring Ca	yorRawhide Canyor Sect	ion 13 Canyon Historical	Queen Cree I	Devils Creek 5.5 Devils Creek
31 6/1/1998 61 7/1/1998	-117 -53	-43 -43	-15 -15	-277 -277	-3 -3	-13 -13	-32 -32	-13 -13	-22 -22	-1	-44 -44	-5 -5	-4	0	0	0	-4	-27 -27	-11 0	-72 -72	-168 -168	0	-16 -137 -16 -137
92 8/1/1998 123 9/1/1998	-90	-43	-15	-277	-3	-13	-32	-13	-22	-1	-44	-5	-4	0	0	0	-4	-27	-11 0	-72	-168	0	-16 -137
123 9/1/1998	-89	-43	-15	-277	-3	-13	-32	-13	-22	-1	-44	-5	-4	0	0	0	-4	-27	-11 0	-72	-168	0	-16 -137
153 10/1/1998 184 11/1/1998	-48 -85	-43 -44	-15 -15	-277 -277	-3 -3	-13 -13	-32 -32	-13 -13	-22 -22	-1 -1	-44 -44	-5 -5	-4 -4	0	0	0	-4 -4	-27 -27	-11 0 -11 0	-72 -72	-168 -168	0	-16 -137 -16 -137
214 12/1/1998	-80	-44	-15	-277	-3	-13	-32	-13	-22	-1	-44	-5	-4	0	0	0	-4	-27	-11 0	-72	-168	0	-16 -137
245 1/1/1999	-85	-44	-15	-277	-3	-13	-32	-13	-22	-1	-44	-5	-5	0	0	0	-4	-27	-11 0	-72	-168	0	-16 -137
276 2/1/1999 304 3/1/1999	-86 E0	-44 -44	-15 -15	-277 -277	-3 -3	-13 -13	-32 -32	-13 -12	-22 -22	-1	-44 -44	-5	-5	0	0	0	-4 -4	-27 -27	-11 0 -11 0	-72 -72	-168 -168	0	-16 -137 -16 -137
335 4/1/1999	-89	-44	-15	-277	-3	-13	-32	-13	-22	-1	-44	-5	-5	0	0	0	-4	-27	-11 0	-72	-168	0	-16 -137
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	-50	-44	-15	-277	-3	-13	-32	-13	-22	-1	-44	-5	-5	0	0	0	-4	-27	-11 0	-72		0	-16 -137
457 8/1/1999 488 9/1/1999	-50	-44	-16	-276	-3	-13	-32	-13	-22	-1	-44	-5	-5	0	0	0	-4	-27	-11 0	-72	-168	0	-16 -137
518 10/1/1999	-54	-45	-16	-276	-3	-13	-32	-13	-22	-1 -1	-45	-5	-5	0	0	0	-4	-27	-11 0 -11 0	-72	-168	0	-16 -137
549 11/1/1999 579 12/1/1999	-50 -73	-45 -45	-16 -16	-276 -276	-3 -3	-13 -13	-32 -32	-13 -13	-22 -22	-1	-45 -45	-5	-5	0	0	0	-4 -4	-27 -27	-11 0	-72 -72	-168 -168	0	-16 -137 -16 -137
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670 3/1/2000 701 4/1/2000	-35 -49	-45 -45	-16 -16	-276 -276	-3 -3	-13 -13	-32 -32	-13 -13	-22 -22	-1	-45 -45	-5	-5	0	0	0	-4	-27 -27	-11 0 -11 0	-72 -72	-168 -168	0	-16 -137 -16 -137
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1310 12/1/2001	-80 -48	-47 -47	-16 -16	-276	-3 -3	-13 -13	-32 -32	-13 -13	-22 -22	-1 -1	-45 -45	-5	-5	0	0	0	-4 -4	-27 -27	-11 0 -11 0	-72 -72		0	-16 -137 -16 -137
1341 1/1/2002 1372 2/1/2002	-48	-47	-16	-276 -276	-3	-13 -13	-32	-13	-22 -22	-1	-45	-5	-5 -5	0	0	0	-4	-27	-11 0	-72	-168	0	-16 -137
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1706 1/1/2003 1737 2/1/2003	-50 -49	-48 -47	-17 -17	-276 -276	-3	-13 -13	-32 -32	-13 -12	-22	-1	-45 -45	-5	-5	0	0	0	-5	-27 -27	-11 0 -11 0	-72 -72	-168 -168	0	-16 -137 -16 -137
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2102 2/1/2004 2131 3/1/2004	-48	-48	-17	-276	-3	-13	-32	-13	-22	-1	-45	-5	-5	0	0	0	-5	-28	-11 0	-72	-168	0	-16 -137
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2192 5/1/2004	-51	-48	-17	-276	-3	-13	-32	-13	-22	-1	-45	-5	-5	0	0	0	-5	-28	-11 0	-72	-168	0	-16 -137
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2315 9/1/2004	-49 -51	-48	-18 -18	-276	-3	-13	-32 -32	-13 -13	-22	-1	-45	-5	-5	0	0	0	-5	-28	-11 0	-72		0	-16 -137 -16 -137
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2406 12/1/2004 2437 1/1/2005	-46	-48	-18	-276 -276	-3	-13	-32	-13	-22	-1	-45	-5	-5	0	0	0	-5	-28 -28	-11 0	-72	-168	0	-16 -137 -16 -137
2468 2/1/2005 2496 3/1/2005	-42 -41	-48 -48	-18 -18	-276 -276	-3 -3	-13 -13	-32 -32	-13 -12	-22 -22	-1	-45 -45	-5 -5	-5 -5	0	0	0	-5 -5	-28 -28	-11 0 -11 0	-72 -72	-168 -168	0	-16 -137 -16 -137
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Oliver, Douglas

From: Chris Garrett <cgarrett@swca.com>
Sent: Thursday, January 25, 2018 3:59 PM

To: Gluski, Heather (RC); Donna Morey; Rasmussen, Mary C -FS; DeAnne Rietz; Joe Frank

(EXT); Gabriele Walser HydroGeo; Laurie Brandt #EXTERNAL#; Nick Enos; Michael Henderson; jknight@usgs.gov; Meza-Cuadra, Gustavo; Congdon, Roger D -FS; Stroope, Timothy L -FS; Olsen, Gregory S -FS; jgurrieri@fs.fed.us; Bret C. Esslin; James Wells; Victoria Boyne; KELLY, PATRICKJ; James Ruff; Oliver, Douglas; magirl@usgs.gov;

Wickham, Matt (G&I); Todd Keay; Charles Coyle; cameo.flood@tetratech.com;

Morissette, Mary (RC); Jim Butler; Peacey, Victoria (RC); Timothy Bayley

Subject: Resolution GW Modeling - Additional follow-up action items

Hi all -

Following the groundwater meeting, we received some additional thoughts from EPA that lend themselves to action items. I'm circulating those here for RCM/WSP to take into account as they prepare follow-up documentation prior to the next groundwater modeling workgroup meeting (2/13). I am taking the liberty of adding my interpretation of whether these are simple clarifications or requests for additional output.

Item #2: Quantify the flow out from Drain (DRN) cells within the reaches of the model and compare these values to the enhanced recharge applied in the stream reach.

EPA comment: These figures depict a losing surface water system (i.e. groundwater levels lower than streambed, recharge magnitudes larger than discharge values, net downward flow). We know this to be true about most arid systems *a priori*. We also know that hydrologic timing is extremely important to GDEs, but that information is not available from this type of graphical depiction.

- What time-period(s) are depicted here? Are these averaged values? [CLARIFICATION REQUESTED]
- Consider providing a timeseries or table of both recharge and discharge, and qualitatively analyzing the reasonableness the relative timing of both processes. [ADDITIONAL OUTPUT REQUESTED]

Item #4: Present the calibration contours at the end of the calibration period (EOY 2016)

EPA comment: I interpreted this question to be a request for more of a "residual heatmap" of calibration errors. It appears that WSP provided a head contour of the calibrated model. Both would are useful...consider contouring RMSE and presenting a figure. [ADDITIONAL OUTPUT REQUESTED]

Item #5: Present a figure with the gaining reaches (i.e., flows to DRN cells) in Devils Canyon, versus the measured flows from surveys conducted by M&A.

EPA comment: It does not appear that WSP has fully addressed this issue. Figures A-1, A-2, A-3 show model recharge boundary conditions, and modeled flows, as well as overlaid perennial reaches. #5 is more akin to a residual analysis where modeled flow volumes and fluxes were compared to observed data.

- How do modeled discharges compare to observed values?
 - o Is there adequate data to answer this question? [CLARIFICATION REQUESTED]
 - For cases where most of the GW discharge is likely being consumed by ET, riparan veg cover may act as a proxy [See Chris comment]
- Spatially, the areas of highest drain flow do not correspond very well with M&A's continuously saturated reaches. This is problematic considering that actual in-stream flow "is expected to be only a fraction of the quantity discharging to the drains."

o By extension, even where drain flows are non-zero and the area is mapped as a perennial reach, the drain flow would have to be much higher than the observed baseflow to maintain perennial flow. Are the modeled flows high enough--given the other "built-in" losses--to support baseflow in reaches where drain flows and perennial reaches overlap? [See Chris comment]

Chris comment: There's a lot packed into this EPA comment, and it ties in with one major concern I heard at the meeting. I believe two of the action items already assigned were related to this (#4 and #7 below). I'll try to restate this all as a general concern, which I think I heard at the meeting: It feels like we don't yet have any method or comparison that gives us comfort that the drain/recharge components used in the groundwater model match the real world. We ideally need some way to come at this question using available real-world data. [ADDITIONAL OUTPUT REQUESTED]

Item 6: Present the steady state water balance at the beginning of the historical model (stress period 1) representing pre-1910 conditions (before mine dewatering commenced).

EPA comment: It appears that in the steady-state run, recharge is balanced by discharge from drains.

- Are the drains in the #6 Table the same drains that are active during the 2016 period? [CLARIFICATION REQUESTED]
 - Drains were added to simulate mine workings, so presumably drain flows would have increased, but Response #1 Table for the 2016 period has a slightly lower drain outflow flux. [CLARIFICATION]
 REQUESTED]

Thanks everyone – and note that we've scheduled more time for the next meeting on 2/13 so we can discuss these more thoroughly than in January

- C

From: Chris Garrett

Sent: Tuesday, January 16, 2018 3:50 PM

To: 'Gluski, Heather (RC)' <Heather.Gluski@riotinto.com>; Donna Morey <dmorey@swca.com>; 'Rasmussen, Mary C -FS' <mcrasmussen@fs.fed.us>; DeAnne Rietz <drietz@swca.com>; Joe Frank (EXT) <jfrank@hydrogeo.com>; 'Gabriele Walser HydroGeo' <gwalser@hydrogeo.com>; Laurie Brandt #EXTERNAL# <lbrandt@dowl.com>; 'Nick Enos' <NEnos@bgcengineering.ca>; Michael Henderson <mhenderson@bgcengineering.ca>; 'Jknight@usgs.gov' <jknight@usgs.gov>; 'gustavo.meza-cuadra@wsp.com' <gustavo.meza-cuadra@wsp.com>; 'Congdon, Roger D -FS' <rongdon@fs.fed.us>; 'Stroope, Timothy L -FS' <timothylstroope@fs.fed.us>; 'Olsen, Gregory S -FS' <golsen@fs.fed.us>; 'jgurrieri@fs.fed.us>; 'Bret C. Esslin' <bcs!

<JWells@everettassociates.net>; Victoria Boyne <vboyne@swca.com>; 'KELLY, PATRICKJ' <kelly.patrickj@epa.gov>; 'James Ruff' <JRuff@azgfd.gov>; 'Oliver, Douglas' <douglas.oliver@wsp.com>; 'magirl@usgs.gov' <magirl@usgs.gov>; 'Wickham, Matt (G&l)' <Matt.Wickham1@riotinto.com>; 'Todd Keay' <tkeay@elmontgomery.com>; Charles Coyle <ccoyle@swca.com>; 'cameo.flood@tetratech.com' <cameo.flood@tetratech.com>; 'Morissette, Mary (RC)' </di>

<Mary.Morissette@riotinto.com>; 'Timothy Bayley' <tbayley@elmontgomery.com>

Hi all -

Thank you all for joining the meeting today. Two follow-up items:

Subject: Springs catalog & GW meeting action items

Springs Catalog

Donna reminded me that the springs catalog actually is posted on the public-facing website, and it can be easily downloaded: http://www.resolutionmineeis.us/documents/montgomery-westland-seep-spring-catalog-20171003

I believe the Resolution catalog contains 24 springs, with substantial detail included for each. By contrast, the springs database that the NEPA team created internally to support the alternatives process contains over 1,000 springs. But...that database also covers a much, much bigger area including all the way down to the Peg Leg alternative. If you compare apples-to-apples, the NEPA team database probably contains about 36 springs within the same area looked at in the Resolution catalog. However, the NEPA spring database contains almost no information whatsoever about each spring except a location. We fully expect that many springs captured in the NEPA Isit are seasonal seeps supported by local precip, not groundwater.

The Resolution catalog represents the most complete look at the major springs that actually have persistent water, support riparian vegetation, and are within the area expected to be impacted by mine dewatering. We can't rule out that there aren't some additional seeps in the area, but the catalog should serve as a solid base to guide the GDE list.

Action Items

- 1. Forest Service/SWCA Continue internal discussions about submittal of raw model files
- 2. Forest Service/SWCA Research the best way to obtain and incorporate the Anderson & Woessner reference
- 3. Forest Service/SWCA Incorporate spring information into the GDE list, and expand the GDE document to incorporate more supporting data to justify inclusion
- 4. RCM/WSP Produce tables to quantify drain and recharge cell graphical depictions that were provided
- 5. Forest Service/SWCA Background task: if available, bring forward any pertinent, adjacent information from Pinto Valley or Carlotta.
- 6. RCM Provide suggestion of reports that reference pumping tests or other useful information to support interpretation of Apache Leap Tuff/Whitetail Conglomerate hydraulic properties, and specifically anisotropy
- 7. RCM For discussion next meeting, consider data sources that allow a reality check on model drain/recharge values (Ones mentioned in the meeting today as possibilities: water balance, baseflow separation work, WestLand surveys)

Hopefully that captured the action items discussed. If I missed one, or even if there is an additional question we didn't get to that you feel would be worth investigating, please email me to let me know.

Thanks!

C

Chris Garrett, P.HGW. Professional Hydrologist - Ground Water Cell: (903) 372-0285 Office: (602) 274-3831



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