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July 6, 2017

Ryan Smith, P.G., C.Hg VP Resource Management and Regulatory Compliance CG Roxane LLC 1210 South Highway 395 PO Drawer A Olancha CA 93549

Dear Mr. Smith:

We have reviewed the April 6, 2017 letter from Geosyntec Consultants wherein baseline groundwater levels and water quality trigger levels are proposed for the Crystal Geyser Cabin Bar Project's Groundwater Monitoring, Mitigation, and Reporting Plan (GMMRP). We concur with Geosyntec Consultants' recommendations, specifically:

- 1. We concur with the proposal to amend the sodium trigger level in OW-10M based on the baseline water quality data indicating naturally occurring elevated concentrations in OW-10M to be set at 40.5 mg/L, which is equivalent to 10% of the EPA Advisory middle range level.
- 2. We concur with the baseline groundwater levels given in Geosyntec Consultants' Table 1.
- 3. We concur to installation of a new 2-inch diameter shallow groundwater monitoring well directly adjacent (within 5-10 feet laterally) to P-15 to better represent shallow groundwater conditions in that area. The groundwater level trigger in the new well will be determined after the well is installed and surveyed using the methods proscribed in Section 6.2.1 of the GMMRP.

To avoid any ambiguity in the assignment of groundwater level trigger levels, triggers should be shown in both feet of drawdown and groundwater elevation above sea level. Hydraulic head in artesian wells should be so expressed.

Sincerely,

Robert Harrington, Director, Inyo County Water Department

Cc: Mark Girvetti, Geosyntec Consultants Kevin Coffman, Geosyntec Consultants Naomi Garcia, TEAM Engineering