



July 18, 2016

Mr. Justin Skinner  
 Environmental Coordinator  
 Agrium Conda Phosphate Operations  
 P.O. Box 758  
 3010 Conda Road  
 Soda Springs, ID 83276

**Subject: Baseline and Background Concentrations of Constituents in Lanes Creek Mine Project Groundwater through May 2015 technical memorandum.**

Dear Mr. Skinner;

DEQ has completed its review of the October 21, 2015 version to the above noted technical memorandum submitted to DEQ via email by Katy Bergholm on October 26, 2015. This letter serves as official notice that DEQ approves the background concentration limits (BCLs) provided in Tables 13 through 20 of the above technical memorandum as representative of current ground water quality conditions specific to each monitoring well addressed in the memorandum. Copies of the tables are enclosed. Any changes to the BCLs must be approved, in writing, by DEQ.

The monitoring well constituent pairs in Table 1 were shown to have a BCL above the Idaho Ground Water Quality standard. The BCL will function as a location specific/POC specific ground water quality standard used to demonstrate compliance to IDAPA 58.01.11.

**Table 1. POC specific groundwater quality standards based on intra well determination of current ground water conditions.**

POC Monitoring Well	Constituent	Ground Water Quality Standard (mg/L)	Background Concentration Limit (mg/L)
LC-MW-AL1	Aluminum (Total)	0.2	0.587
	Iron (Total)	0.3	0.522
	Manganese (Total)	0.05	0.0888
LC-MW-AL2	Iron (Total)	0.3	0.333
	Manganese (Total)	0.05	0.120
LC-MW-AL4	Manganese (Total)	0.05	0.0892
LC-MW-AL5	Aluminum (Total)	0.2	8.19
	Iron (Total)	0.3	6.41
	Manganese (Total)	0.05	0.133

BCLs have yet to be developed for POC monitoring wells LC-MW-AL8, LC-MW-AL9, LC-MW-AL10, LC-MW-5W and LC-MW-6W completed earlier this year. DEQ expects BCLs will be derived for these monitoring wells as soon as sufficient data sets are produced. Additionally, BCLs are to be derived for all constituents currently displaying statistically significant trends once a break in slope can be identified and no trend can be statistically verified.

Sincerely,

A handwritten signature in black ink, appearing to read 'B. Olenick', with a long horizontal flourish extending to the right.

Bruce Olenick  
Pocatello Regional Administrator  
State of Idaho-Department of Environmental Quality

CC: Doug Tanner, DEQ-Pocatello  
Scott Miller, DEQ-Boise  
Lisa Rowles, Brown and Caldwell-Boise

Enclosure: