

November 5, 2014



Via Electronic Mail ([commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)) and Facsimile (916) 341-5620

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, California 95812-2000

**Re: Comment Letter – Royal Mountain King Mine Amendment**

Dear Ms. Townsend:

We submit these comments on behalf of Meridian Beartrack Company (“Meridian”), the current owner of the Royal Mountain King Mine Site (“RMKM Site”), which is the location of a former gold mine in Calaveras County. These comments relate to the *Proposed Approval of an Amendment to the Water Quality Control Plan for the Sacramento and San Joaquin River Basins to Establish a Groundwater Regulatory Framework for the Royal Mountain King Mine Site, Calaveras County* (“Proposed Amendment”).

Meridian supports the adoption of the Proposed Amendment. This amendment, along with the proposed revision to the Sources of Drinking Water policy to establish a site-specific exception for limited areas of groundwater at the RMKM Site, are the culmination of a ten-year process that resulted from this Board’s directives in Order No. WQO 2004-0007. As instructed by that Order, the Regional Water Quality Control Board, Central Valley Region (“Regional Board”) has evaluated a full range of alternative paths in formulating a comprehensive plan for closure of the RMKM Site in conformance with law. Over the last ten years, Meridian has provided extensive empirical data, technical studies and scientific analyses to assist the Regional Board in determining the most appropriate path forward for meeting these requirements.

The Proposed Amendment was unanimously approved by the Regional Board on March 28, 2014. Meridian submitted timely written and oral comments in support of the Regional Board’s approval of the final version of the Proposed Amendment. The Proposed Amendment is fully warranted by the conditions at the RMKM Site and is believed to be in conformance with all applicable legal requirements. The State Board’s approval of the Proposed Amendment will establish a regulatory framework for a comprehensive closure of the RMKM Site based on the current successful groundwater management strategy.

Meridian is not aware of any other comments regarding the Proposed Amendment that have been submitted to the State Board. Meridian requests the right, as the owner of the RMKM

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Site which is the subject of the Proposed Amendment, to respond in writing to any such comments and to make an oral presentation to the State Board, if necessary, to address any adverse public written or oral comments or to answer any Board member questions.

Please let us know if we can provide any further information to the Board on these subjects.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Paul P. Spaulding, III".

Paul P. "Skip" Spaulding, III

PPS:jl

cc: Mr. Adam Whitman  
Dr. Tom Patterson