

**From:** [Grant Brackebusch](#)  
**To:** [Kourtney Romine](#)  
**Subject:** IDL Negotiated Rulemaking - IDAPA 20.03.02, Rules Governing Mined Land Reclamation  
**Date:** Friday, July 17, 2020 02:40:51 PM

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Kourtney,

I have a question/comment on the new rules, concerning the definition of Land Application in Section 010. Why does the definition mention slurries or water potentially containing cyanide? I wouldn't think you want to land apply cyanide solutions but a mine should be able to land apply water from mine dewatering as provided currently by the exemption for mining in the current DEQ regulations. It is not clear to me why this definition was changed to include the cyanide reference as it seems to confuse matters.

Regards,

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