

RCO

Winding Stair Resources, LLC
210 Park Avenue, Suite 2820
Oklahoma City, OK 73102
(405) 948-1556 Office ☎ ☎ (405) 948-1048 Fax

RECEIVED

APR 18 2014

DIVISION OF RECLAMATION
MINING AND SAFETY

April 11, 2014

DIVISION OF RECLAMATION, MINING AND SAFETY
Department of Natural Resources
1313 Sherman St., Room 215
Denver, CO 80203

TROI

Re: Sag-Cal Project, Notice of Intent (NOI) No. P-2014-004, Technical Review (Operator's Responses)

Dear Mr. Oswald:

We submit the following information in response to items addressed in your letter dates April 2, 2014:

1. A detailed map showing the existing 4-WD trails with footages from established trails for each drill site will be provided within 15 days of this letter. We have confirmed with Andrew Archuleta of the BLM San Luis Valley Field Office that overland travel to access to each site will be allowed. Please note that the Map is confidential and should not be made publically available.
2. No earthen fills or culverts will be needed to make access routes to each drill site passable, which is in compliance with the BLM.
3. Straw wattle will be used to prevent sediment in sort-water runoff on any excavated and bermed topsoil at each drill site.
4. Initial acreage values were estimated. As provided by the drilling company, each drill pad site will be 50' by 50' equating to 0.058 net acres per site for a total area of 0.232 acres disturbance for all four proposed drill sites.
5. The surface disturbance listed in the BLM notification was a typographical error. As described in Item # 4, each drill pad site will be 50' by 50' equating to 0.058 net acres per site for a total area of 0.232 acres disturbance for all four proposed drill sites.
6. Any Hydrocarbons will be stored in approved containers of either double-walled tanks or drums within a plastic membrane. Any drill fluids not immediately used will be stored in spill containment containers. All drill fluids will be environmentally friendly and biodegradable.

✓ Annual Fee ?

✓ No Violations

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7. No disturbance to existing trees and shrubs is anticipated. Where practicable, woody vegetation present at the site shall be removed from or appropriately incorporated into the existing topsoil prior to excavation within the affected areas and re-distributed over each drill site during reclamation as per Rule 3.1.9.
8. All drill sites will be monitored quarterly and treated as needed with an approved agent from the "Herbicides Approved for Use on BLM Lands in Accordance with the 17 Western States PEIS ROD and Oregon EIS ROD*" list for control of noxious weeds until sites are fully reclaimed and released from further reclamation liability. We will obtain a list of BLM approved weed-free seed mix for use during reclamation.
9. We are aware that if groundwater is encountered, the procedure for closure of drill holes will be made in accordance with Rule 5.4.2.
10. We acknowledge receipt of the "Mineral Prospecting Drill Hole Permanent Abandonment Final Report". We will provide the form to the drilling contractor to complete upon the closure of each drill hole and submit to the DRMS.
11. Andrew Archuleta of the BLM San Luis Valley Field Office will provide a list of BLM approved weed-free seed mix with application rates for use during reclamation.
12. Andrew Archuleta of the BLM San Luis Valley Field Office will provide a list of BLM approved fertilizers with application rates for use during reclamation.

Please let us know if any other items in the NOI need clarification.

Sincerely,

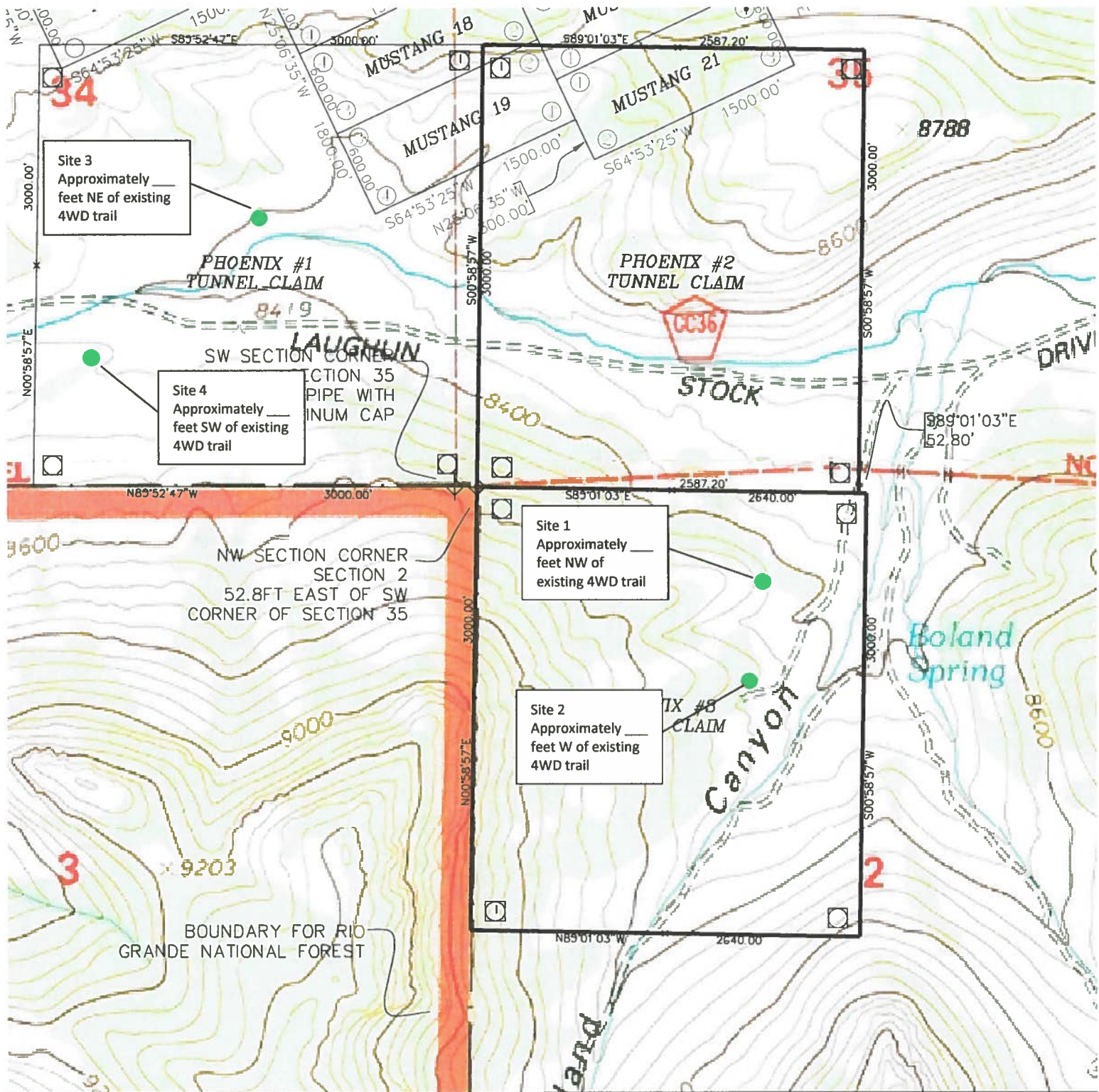


Scott W. Calhoon
President
Winding Stair Resources, LLC
210 Park Avenue, Suite 2820
Oklahoma City, OK 73102

EC: Andrew Archuleta, BLM Saguache
Russ Means, DRMS Grand Junction

SECTIONS 34 & 35 OF T.45N., R.6E., N.M.P.M. -AND- SECTION 2 OF T.44N., R.6E., N.M.P.M.,
SAGUACHE COUNTY, COLORADO

CONFIDENTIAL



== = 4-Wheel Drive Trail





United States Department of the Interior



BUREAU OF LAND MANAGEMENT
San Luis Valley Field Office
46525 Colorado Highway
Saguache, Colorado 81149

11 April 2014

Mr. Scott Calhoun, Manager
Winding Stair Resources, LLC
210 Park Avenue, Suite 2820
Oklahoma City, OK 73102

Dear Mr. Calhoun:

Based on our April 10 phone conversation, you will be sending GPS coordinates for each of the proposed core sample sites described in your Notice of Intent (NOI). Once we receive that information we will complete cultural resource surveys for each location.

We received a copy of the comments provided by the Colorado Division of Reclamation, Mining, and Safety (CDRMS). Once we complete our review of the NOI, we will address the questions raised by CDRMS requiring BLM response. We should complete our review by April 11, 2014.

Please don't hesitate to call me at 719-655-2547 if you have questions.

Sincerely,

/s/Andrew Archuleta

Field Manager,
San Luis Valley Field Office

EXPECTED DELIVERY DAY: 04/17/2014

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USED INTERNATIONALLY,
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FORM MAY BE REQUIRED.

FROM:

Winding Stair Resources, LLC
210 Park Avenue, Suite 2820
Oklahoma City, OK 73102

TO:

DIVISION OF RECLAMATION, MINING
AND SAFETY
Department of Natural Resources
1313 Sherman St., Room 215
Denver, CO 80203



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EP14F July 2013

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