

CRG Mining LLC  
510 S. Wisconsin St.  
Gunnison, CO 81230

May 3, 2017

Colorado Division of Reclamation, Mining and Safety  
1313 Sherman St., Room 215  
Denver, CO 80203

**RECEIVED**

MAY 25 2017

**DIVISION OF RECLAMATION  
MINING AND SAFETY**

Re: Request for Technical Revision, Upper Gold Links Mine, Permit M-2016-083

To whom it may concern:

Please find the enclosed Request for Technical Revision form and revised exhibits for the Upper Gold Links Mine 110(2) permit. There is no fee authorized for this TR, so no fee payment is enclosed.

This TR is to facilitate improved ability to safely access the old existing workings and to facilitate the development of future areas of interest in the mine. The improvement and changes chiefly consist of relocating the original planned portal at the 300 foot level to a new site some 50 feet to the west of the old portal location on the 400 foot level. This new proposed portal would be developed at the 390 foot level and will be accessible via the same existing road leading to the existing upper portal, with a slight change in the access bench near the portals. This new portal, as with the old workings, will be a dry mine with no discharge occurring during the redevelopment program. The portal and access will not require significant change to the road or bench, and can be accomplished through limited earthwork. Please see the enclosed revised exhibits for detailed description.

Please contact me if you have further questions.

Sincerely,

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

Robert Gydesen  
Mine Manager  
CRG Mining LLC

Encl: Technical Revision Request form, revised exhibits

Exhibit C – Mining Plan (Rule 6.3.3) REVISED May 3, 2017

The plan initially consists of continuing to extend the limited underground workings of the 400 Level (the upper portal), and enlarging the waste dump. For the benefit of the long term strategy of the mine and underground safety (better ventilation and secondary escapeway) the operator wants develop a new portal at the 390 foot level some 50 feet to the west of the original Upper Gold Links Portal. Information gained through underground investigation (as part of the NOI-approved activities) shows that further development work should not continue primarily at the upper 400 Level portal as originally planned, but instead at a new portal located approximately 50 feet west of and about ten (10) feet lower than the 400 Level portal, identified herein as the 390 Portal. It is not located on any ore vein and we find that the rock is more competent and will improve long-term safety and stability.

Underground development, from any portal, will generate waste rock. The additional rock from this 390 Level portal will be placed on the existing 400 Level waste rock dump. Rock from the 400 Level had been used to create the upper working pad. New rock from the 390 Level will be placed on the existing pad and along the road bench, which will not increase the footprint of the disturbed area. The small additional volume of waste rock from the 390 Level portal can widen the bench and road, but also placed so as to eliminate the tight switchback on the access road to improve safety. An ADS underdrain pipe will be installed below the fill material that may be placed at the switchback, as described below.

Similar to the 400 Level, constructing the 390 Level adit will require excavating back into the hill slope a short distance to competent rock, where placement of steel sets or a modified shipping container will be installed. Wing walls will be built on either side of the portal entry for safety and long-term stability of the cut face on the slope. The excavated hillside material will be backfilled above and around the emplaced adit structure, and graded to match the natural slope.

This is the same as was proposed in the original plan, at the 300 Level portal.

All of the portals will be constructed to be durable and able to be secured, since they will remain on the site as permanent features, per the landowner's wishes (see letter in original permit application materials). The portals will be safeguarded during all mining and reclamation stages.

Before any portal or pad earthwork occurs all soil will be stripped and stockpiled on the upgradient end of the gulch (below the access road switchback), to protect it until it is replaced for reclamation. The stockpiled soil will be seeded to grass (see Exhibit D seed mix) and monitored for weeds.

The 400 Level portal presently exists since it was constructed during the current NOI. The hill slope excavation above and around the steel sets of the adit was backfilled and contoured for stability and for reclamation.

The waste rock is known to be mica schist that is non-mineralized. The wall rock of the nearby Dunraven tunnel and that, which is already exposed in the Upper Gold Links 400 Level both, exhibit this type of rock. It is anticipated that any waste rock generated in future activity will be consistent with this inert character, and not require any special disposal or placement.

The permit area is located in a dry gulch, which has never been observed to flow. However, to accommodate any natural drainage flow a CMP will be installed as an underdrain along the invert of the gulch prior to placement of the waste rock. The specifications of the CMP are: corrosion-resistant ADS material, 24-inch diameter, and capacity is 12.5 CFS. Outside corrugations and wall thickness ensure strength below equipment traffic and work areas; smooth inside walls ensure sufficient conveyance of stormwater. The ADS is installed in sections that join securely, and can be added to if needed. Including the sections under the switchback fill material, approximately 500 lineal feet is estimated to be needed.

New tunnels to be driven at all levels will have the dimensions up to 15-ft height by 15-ft width. The estimated length and dimensions of the tunnel allow for close estimation of the volume of waste rock and size of the dump.

The pad fill that is placed above the ADS will be inert waste rock. A raised berm will be created at the upstream end of the fill and ADS inlet to intercept gulch flows. The margin of the both (upper and lower) pads' surfaces will be bermed for stormwater containment (the berm will be at least 3 feet high as a safety requirement). The lower pad surface will be graded at 1% slope to direct any precipitation falling on the pad and upper slope to a stormwater pond at the downgradient end of the lower pad (see map). Although the waste rock will be very porous and most precipitation will percolate into the dump and gulch, the stormwater pond will have a designed outlet and riprapped spillway, to control sediment. Any overflow from the stormwater pond will be conveyed by riprapped ditch to the invert of the gulch near the ADS pipe outlet below the toe of the dump. Straw wattles or similar sediment control structure will be staked below the toe of all placed dump material, and around all stockpiled soil. Sediment controls will be maintained until the slopes are stabilized.

The outslope of the waste rock dump will be graded to no steeper than 2:1 (H:V). During mining, the pad slope will be maintained at 2:1. When the workings intercept the Gold Links Mine workings, it will greatly simplify conveying ore down to the Gold Links Mine level, and the waste dumps will not expand any more as waste will be able to be stored in the old mine workings. After the dump and pad have reached the full size, and the dump outslope configuration is permanently established, soil will be placed there from the stockpile and seeded.

The features of the waste rock pad will include a portable steel building on skids to contain equipment, and store materials and fluids. The building will be approximately 8x20 ft. The pad will also contain a wheeled air compressor and materials storage area. The portal will remain as permanent. Other surface features at the site, such as portable equipment, piled materials, ventilation fan, etc., will be removed at the conclusion of the mining stage.

All fluids, such as fuel, other hydrocarbons, antifreeze, etc., will be stored the building, in their original labeled containers, and adequate impermeable secondary containment will be provided. All such storage is not in contact with the weather or ground conditions. These materials will be removed from onsite storage at the conclusion of mining and reclamation.

The 400 Level portal will be maintained for ventilation and access, but no advancement through these workings is expected. Efforts will concentrate on surface earthwork to access the 390 Level portal site and developing the 390 Level workings. (see Exhibit E maps).

Since it is anticipated that new tunneling to connect to existing underground workings will be limited, there will be little waste rock to be mucked out and placed on the pad.

All roads to be used to access both portal levels on the site currently exist and will remain as permanent features, per the landowner's wishes. Drainage controls on the site, such as underdrains and berms will also remain to help ensure the long-term stability of the roads and the site.

#### Exhibit D – Reclamation Plan (Rule 6.3.4) REVISED May 3, 2017

Certain existing features will remain permanently, per the landowner's wishes (see letter in the original permit application materials). These features include the portal entries and roads. All fluids, fuel, equipment, and supplies will be removed from the portable building and the pad during reclamation. The portal entry will be a locked heavy steel door. The heavy concrete wing walls next to the portal doors will remain as permanent retaining walls to ensure integrity of the portals.

The soil that was salvaged prior to excavation and waste rock placement will be respread on the slopes above the adits and the out slopes of the dumps, and reseeded. See the seed mix below. Slash from the few trees that were removed before excavation, will be scattered on the surfaces that were topsoiled and seeded.

Waste rock out slopes that were established during the mining stages, at 2:1 (H:V) or gentler, are considered permanent and will not require more reclamation grading. Wherever possible, the slopes will be topsoiled and seeded during the mining stages, and any areas requiring further soil or reseeding will be addressed during the final reclamation stage.

The site will receive any necessary weed control throughout the reclamation stage. Straw wattles and earthen berms will remain to help ensure long-term sediment control.

Reclamation earthwork may consist of minor surface grading on the slopes and road ditches. This can be accomplished with a D6 dozer, and is estimated to be a total of 1000 cubic yards. Material will be pushed a nominal 60 feet, on a level average push. There will be no deep fills or compaction needed.

Debris disposal may include up to 50 cubic yards of miscellaneous (clean) wood and steel debris that can be disposed of onsite in a shallow slot during final reclamation grading. Contaminants may include diesel fuel and a variety of fluids for the equipment, but it will not be bulk storage, so it will be less than 250 gallons max in a contained area.

Portable equipment removal, as listed above, can be by flatbed truck and/or trailer.

#### Reclamation seed mix (broadcast rate)

Species and variety	Rate (lbs PLS/ac)
Canada bluegrass	2.5
Alpine fescue	3.0
Sainfoin	1.5
Rocky Mountain penstemon	0.5

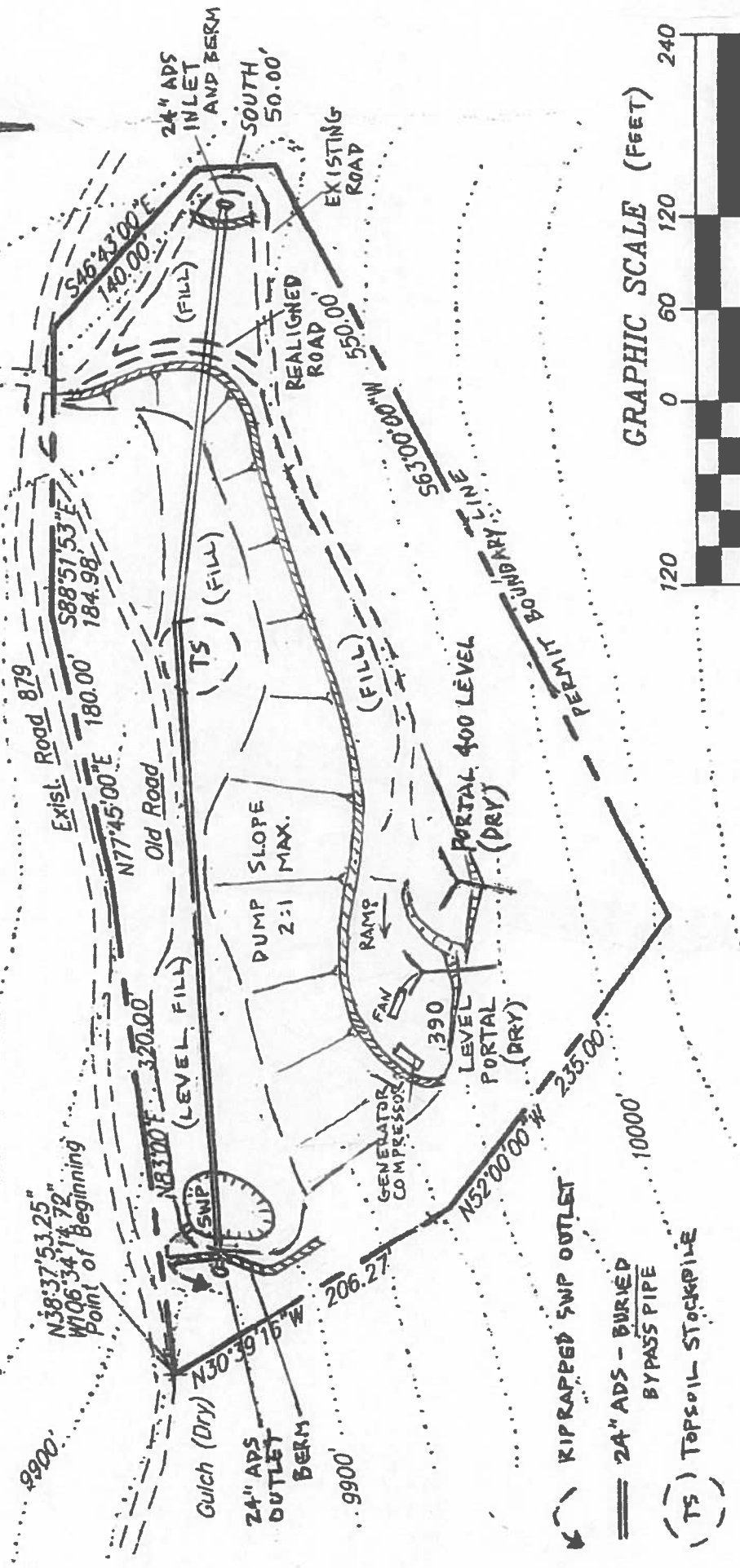
Seed will be manually broadcast on all dump out slopes, backfill areas above adits, and roadcuts, at the rates shown. The rough surfaces being seeded will sufficiently catch the seed with no further dragging or raking needed. Any tree slash that can be scattered over

revegetated areas will help reduce erosion and may help reestablish lodgepole pine seedlings. Seeded areas are estimated to be a total of 1.5 acres.

The additional portal requested under this TR does not add an opening that has to be closed, nor expand the disturbed area to be seeded, nor increase the amount of slopes that must be graded during reclamation stage. Reclamation tasks and the required equipment do not change under this revision.

An estimate of the reclamation costs, therefore, based on the amount of reclamation bond already calculated by the Division, do not change for this technical revision. The operator requests that the bond amount already posted should not increase.

**Exhibit E -- Mining Plan Map -- REVISED**

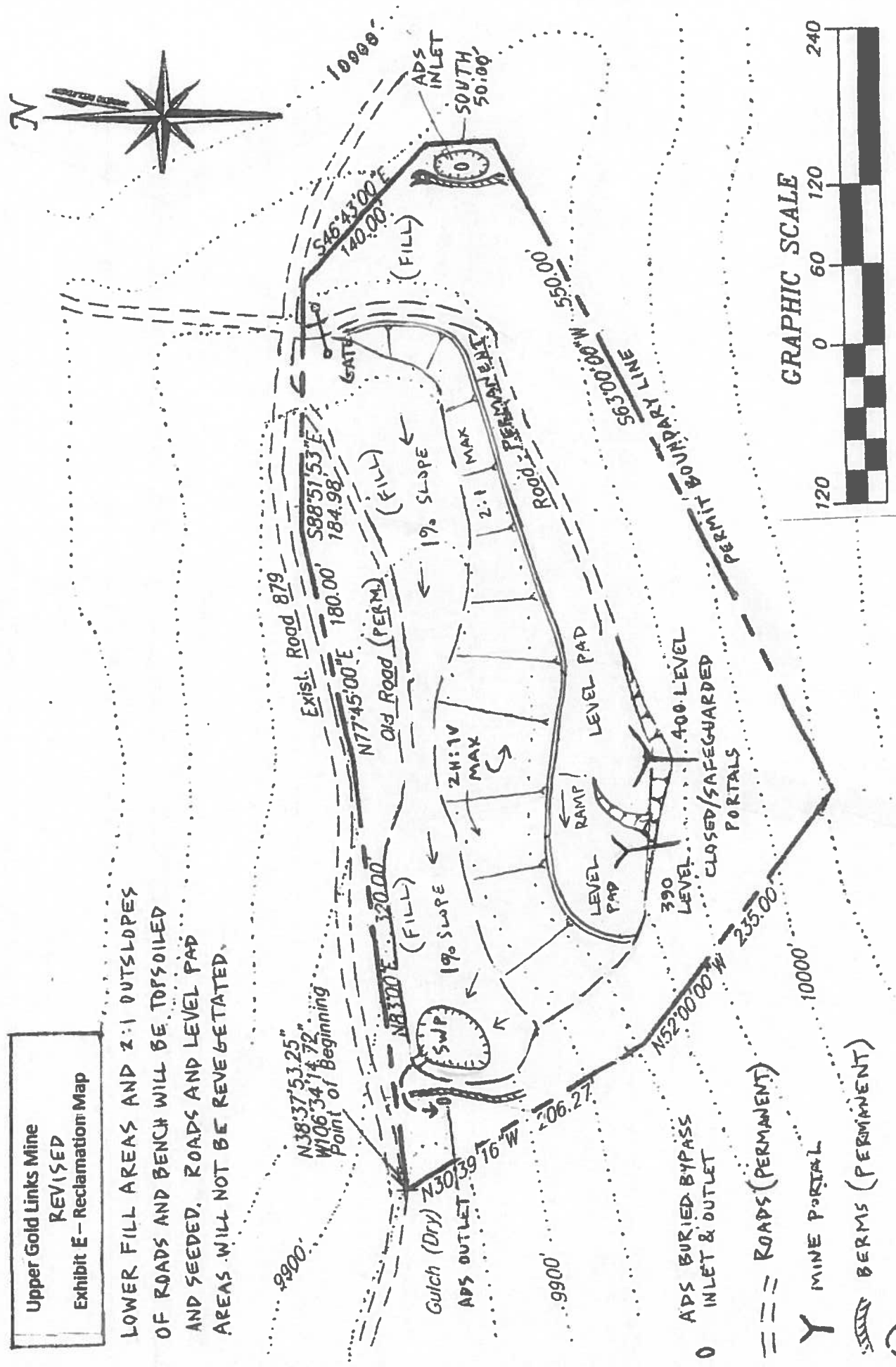


BERM

This Plan Map prepared by Bob Oswald, High Country Consulting Services LLC, and based on surveyed map by All County Survey. Bob Oswald 5/4/17

Upper Gold Links Mine  
REVISED  
Exhibit E - Reclamation Map

LOWER FILL AREAS AND 2:1 OUTSLOPES  
OF ROADS AND BENCH WILL BE TOPSOILED  
AND SEEDED. ROADS AND LEVEL PAD  
AREAS WILL NOT BE REVEGETATED.



ADS BURIED BYPASS  
INLET & OUTLET

== ROADS (PERMANENT)

Y MINE PORTAL

BERMS (PERMANENT)

SWP STORMWATER POND #1 OUTLET

..... CONTOUR LINE (INTERVAL 20 FT.)

This Plan Map prepared by Bob Oswald, High Country Consulting Services LLC, and based on surveyed map by All County Survey. Bob Oswald 5/4/17