



**COLORADO**  
Division of Reclamation,  
Mining and Safety  
Department of Natural Resources

1313 Sherman Street, Room 215  
Denver, CO 80203

June 5, 2017

Ben Langenfeld  
Greg Lewicki and Associates  
3375 W. Powers Circle  
Littleton, CO 80123

RE: Detroit City Mine; DRMS File No. M-2017-003; Adequacy Review No. 3

Dear Mr. Langenfeld,

The Division has identified several other comments and questions that must be addressed prior to the Division's decision due date. **Please be advised that if you are unable to satisfactorily address any concerns identified in this review before the decision date, it will be your responsibility to request an extension of the review period. If there are outstanding issues that have not been adequately addressed prior to the end of the review period, and no extension has been requested, the Division will deny this application.**

1. The Applicant has provided a commitment to conduct geochemical testing of the waste rock. However, the Applicant has not provided a proposed timeline for conducting and reporting the results of the geochemical testing. In addition, the Applicant has not provided a sampling plan for the geochemical testing. Please submit a sampling plan and a proposed timeline for conducting and reporting the results of the geochemical testing. Waste rock may not be placed on the WRL until such time as the Division determines the waste rock is not toxic or acid-forming.
2. The revised Map C-2 shows a topsoil windrow located above the WRL which is outside of the proposed permit boundary. Please provide a revised Map C-2 which shows that all topsoil windrows will be located within the proposed permit boundary.
3. The geotechnical analysis did not account for saturated conditions within the WRL. Map C-2 shows the toe of the WRL is located immediately above the sediment pond. However, Map C-3 shows that the sediment pond and the toe of the WRL are separated by 25'. Please confirm there will be enough separation between these features to prevent saturated conditions in the toe of the WRL.
4. The financial warranty estimate does not include a cost for grading the active stage of the dump. Please revise the financial warranty estimate to include this reclamation task.



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5. The financial warranty estimate includes a cost for installing steel doors on both portals which will be backfilled. The Applicant has already indicated the steel doors will be in place during active mining operations to prevent unauthorized entry into the mine. Please clarify if the steel doors will remain after the portals have been backfilled.

As previously mentioned, if you are unable to provide satisfactory responses to any inadequacies prior to May 24, 2017, it will be your responsibility to request an extension of time to allow for continued review of this application. If there are still unresolved issues when the decision date arrives and no extension has been requested, the application will be denied.

If you have any questions, please contact me at (303)866-3567 x8116.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mike C.", is positioned above the printed name.

Michael A. Cunningham  
Environmental Protection Specialist

CC: Wally Erickson, DRMS