

1313 Sherman Street, Room 215 Denver, CO 80203

October 10, 2017

Interoffice Memo New Horizon Mine (Permit No. C-1981-008) Technical Revision No. 81 (TR-81)

I have reviewed New Horizon Mine's (NH) PAP and proposed changes regarding the addition of the Lincoln Street haul road submitted to ensure the following Rules have been satisfied as part of the TR-81 review process.

Rule 4.03.1(1)-(5)

Rules 4.03.1(1)-(5) deal with the performance requirements for haul roads.

- General Requirements All general requirements for haul roads are discussed starting on page 30 for the addition of Lincoln Street Haul Road of Section 2.05.3(3) in NHN's TR-81. Description and designs provided for each haul road satisfy the requirements of this section.
- (2) Location Haul roads have been designed and placed in areas that are of most stability. Discussions regarding sediment control and minimization of sedimentation and flood have been addressed with the proposed attachment 2.05.3(3)-1.
- (3) Design and Construction Vertical alignment requirements have been met. Haul road grades for each section has been included on Map 2.05.3(3)-8. There is no section of haul road that exceeds 10% grade and no issues regarding horizontal alignment. Width of haul roads is shown on Map 2.05.3(3)-8. Typical design cross-sections are included on Map 2.05.3(3)-8. Haul roads are designed to allow for anticipated traffic. Road cut designs are included in Map 2.05.3(3)-8 under the "Typical Views" of the map. Road cuts are designed with a range of 1.5h:1v to 10h:1v which is more conservative than that which is required under this Rule.
- (4) Drainage Drainage for haul roads are discussed under the attachment 2.05.3(3)-1. Additional SEDCAD demonstrations for Culver C-176 are found in associated attachment 2.05.3(3)-28.



Name of Addressee Page 2 Date

- (5) Surfacing Surfacing discussion is included in the proposed Lincoln Street haul road section beginning on page 30 in Section 2.05.3(3).
- (6) Maintenance Maintenance discussion is included in the proposed Lincoln Street haul road section beginning on page 30 in Section 2.05.3(3).
- (7) Reclamation Reclamation discussion is included in the Lincoln Street haul road section beginning on Page 30 in Section 2.05.3(3).

All topics and discussions required under Rules 4.03.1(1)-(5) have been met in NH's proposed changes with TR-81 and I have no adequacy questions.

This concludes my review of the above mentioned sections for the New Horizon Mine's TR-81 review. If you have any questions, feel free to contact me.

Sincerely,

756

Zach T. Trujillo Environmental Protection Specialist

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