



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

1313 Sherman Street, Room 215
Denver, CO 80203

November 2, 2017

Sara Glinatsis
Sunrise Mining LLC
P.O. Box 160 Arvada, CO 80001

**Re: May Day Idaho Mine Complex, File No. M-1981-185, 112d-2 (AM-2) Application
Adequacy Review Number 2**

Dear Ms. Glinatsis:

The Division of Reclamation, Mining and Safety (Division) has reviewed your first adequacy response that was received on September 29, 2017 in order to ensure that it adequately satisfies the requirements of the Colorado Mined Land Reclamation Act (Act) and the associated Mineral Rules and Regulations of the Colorado Mined Land Reclamation Board for Hard Rock, Metal, and Designated Mining Operations (Rules). During review of the material submitted, the Division determined that the following issues of concern still need to be clarified or further addressed.

1. All Maps and Figures

- a. The maps and figures in this submittal were re-sized to be clearer. However the scale was not updated to reflect this change, thus making the scale bar inaccurate. Improper scale makes verification of distances and calculate acreages inaccurate. Please submit a new set of maps ensuring accurate scale bars so verifications can be completed.

2. Exhibit A- Legal Description

- a. The listed permit acreage in section 6.4.1(1) is 295.79. This is higher than the 274.7 Permitted acres in the original AM-2 Application. Telephone conversations have indicated that this was an error and the intended permit acreage is still 274.7. Please clarify that the permit acreage will remain at 274.7 acres as originally submitted.
- b. In Figure A-1 several areas are outlined and labeled "Borehole #8, Borehole #9, Borehole #9, and Borehole #10". However these are not included in any section of the original AM-2 application nor the Adequacy Response. Please clarify that the boreholes were included in error and submit a new figure A-1 with those features removed.



- c. The shape of the permit area in Figure A-1 is inconsistent with any previously submitted maps depicting the permit boundaries. Furthermore the scale of figure A-1 is inaccurate and there is no list of acreages to verify with the narrative of Exhibit A. Please include these details in the revised Figure A-1.
- d. The “corners” of the permit boundary are depicted by red dots in Figure A-1. While they are clearly identified; a list of the GPS coordinates for each of the corners was requested by the Division and was not included. Please submit a list of the GPS Coordinates for each of the corners that corresponds to the corrected Figure A-1.

3. Exhibit C- Pre-Mining and Mining Plan Maps of Affected Lands

- a. In the narrative of the affected lands as well as Exhibit D, Mining Plan, the May Day 1 East and the May Day 2 East are discussed. Enlarged maps are not included with Exhibit C. Please clarify that no disturbances are currently planned for these areas. The applicant needs to commit that if a disturbance is planned in those areas it will be addressed through the Technical Revision Process and enlarged maps will be included at that time.

4. Exhibit E- Reclamation Plan

- a. In the closure and final reclamation section, no reclamation activities are discussed for the May Day #2 area. The construction of a compacted temporary ore storage pad as well as fuel storage facilities with secondary containment is discussed in Exhibit D, as well as other places in the Adequacy Response. Please address what reclamation of the ore storage pad, the fuel storage areas and any other non-mobile structures will be required at the May Day #2 Area.

5. Exhibit G- Water Information

- a. In the projected water sources the details of the water rights are discussed. The narrative states that the second water right (Case No. 06CW91) authorizes the conditional use of 1 Cubic Foot Per Second (C.F.S.) capped at 12 Acre Feet Per Year (AcFt/Yr.) On Page 2 of Table g-4, the water right clearly states that the diversion will be limited to .22 C.F.S. or 10.8 AcFt/Yr. Please clarify this discrepancy.
- b. In the Discharge and Storm Water Management Permit section an interim CDPS Industrial Wastewater Discharge Permit (COR03H717) has been issued for the Idaho Spring. Please submit documentation of the issuance of this interim permit.



- c. Please clarify the permit number for the domestic production well issued by the Division of Water Resources (DWR) and include this permit is included in Exhibit M.

6. Exhibit M- Other Permits and Licenses

- a. DWR permits are listed for the four groundwater monitoring wells and a domestic production well. Seven copies of the same monitoring well permit (Permit Number 287229) were included. Copies of the other three monitoring well permits were not submitted. Please submit copies of the well permits for all monitoring wells as listed in Table G-2. The missing permits are for permit number 287229, 285910, and 285009.

7. Exhibit R- Proof of filing with the County Clerk and Recorder

- a. Please submit a receipt showing that the Adequacy Response that was most recently submitted to the Division has been filed with the La Plata County Clerk and Recorder.

8. Exhibit T- Permanent Man-made Structures.

- a. It is the Divisions understanding that structure agreements have been received by La Plata Electric Association, Hernreich R 1987 Family Trust, Ward Lee, John Sutton and Elizabeth Vaught. The Geotechnical Stability Report for the New Access Road was submitted as an engineering survey for the remaining 18 structures listed in Exhibit T. The specific structures covered by the analysis were not identified. Please submit a report signed by a licensed P.E. that identifies which structures are covered by the Geotechnical Stability report for the New Access Road. If there are structures that are not covered by the report please submit an adequate engineering survey in compliance with Section 6.4.20 of the Hard Rock and Metals Mining Rules.

9. Exhibit U- Environmental Protection Plan

- a. In the Division's first adequacy review document dated July 31, 2017, Item 17 (c) specifically requested details on all Environmental Protection Facilities (EPF). While details of the storm water control structures were included in other sections the Division's request for a list of all EPF's was missing. Detailed drawings and specifications of the EPF structures by a licensed engineer must be included in the Facilities Evaluation Section. The requested EPF list and details of the structures was not submitted. Also the details of the construction of the ore storage pad at the Base of Operations are still unclear. The narrative describes a clay lined storage pad with secondary containment while the drawings reference a 30 mil Geotextile liner. Please clarify this discrepancy with a narrative and separate drawings that detail the



construction of the ore storage pad with secondary containment. Similarly the details of the secondary containment structures for the Chemical Storage lockers at the Base of Operations and the Fuel Storage structures at the Base of Operations, May Day #1 and #2 are unclear. Please submit a narrative and separate engineered drawings detailing the specifications of the secondary containment structures for each of these facilities to be included in the Facilities Evaluation section of Exhibit U.

- b. It is the Division's understanding that the previously submitted stand-alone document titled Updated Surface and Groundwater Characterization Data has been disseminated into each respective exhibit. In the Division's initial adequacy review, item 17 (f) asked for a summary interpretation of the surface and groundwater characterization data as required by section 6.4.21(9) (b) and (c). This information was requested to be included in Exhibits G and U. While the summary data tables were included in Exhibit G no interpretation of the data by the applicant was included in either location. Please submit a summary interpretation of the surface and groundwater characterization results that adequately addresses items in section 6.4.21(9) (b) and (c).
- c. The construction schedule requested by item 17 k in the Division's initial adequacy review was not included. Please include discussions of all EPF's that have been identified that outlines a tentative construction schedule. This schedule can be approximate and not tied to a specific date. Provide an estimate on the length of time each facility will need to be constructed as well.
- d. Please clarify that the proposed mining activities will not encounter the discussed flooded workings (Levels 423 and 545). Please clarify that proposed plans do not anticipate affecting the quantity or quality of the water within those workings.

10. Rule 6.5 Geotechnical Stability- Blasting

- a. A new engineering survey addressing blasting affects for blasting operations taking place in the May Day #1 underground workings was requested in the previous adequacy review. A new engineering survey was not performed nor included. The survey that was resubmitted addressed blasting in the May Day #2 underground workings and is not consistent with the plans for blasting operations at the May Day #1. Please have a new analysis performed by a 3rd party licensed engineer to address the possible blasting effects from blasting in the May Day #1 underground workings. This analysis should include but is not limited to a narrative on the scaled distance calculations, details on the expected ground vibrations as well as a map showing the distance from the blast area to the nearest structure. The engineering survey should also review and assess the as built certifications for the portal and stabilization work



that was performed at the May Day #1 portal in relation to the effects on the portal and its structures from blasting activities.

Please submit your responses to the above listed issues by **Monday, November 13, 2017** in order to allow the Division sufficient time for review. Note that this review is not considered final, and any other material submitted must be reviewed which may generate additional clarifications and / or corrections. The current decision date for the Amendment is Friday December 15, 2017. If the requested information, is not received by the above listed date, your amendment application is considered incomplete and the Division cannot recommend approval. If an extension of the Decision Date is required it must be requested in writing by the applicant and received by the Division's Denver Office by no later than **Monday November 13, 2017**. The extension request will need to request a new decision date of at least Friday February 23, 2018 in order for the Division to meet statutory requirements for the objector process.

If you require additional information, or have questions or concerns, please feel free to contact me at the Division's Grand Junction Field Office, by phone at (970)-243-6368 or by email at lucas.west@state.co.us.

Sincerely,



Lucas West

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Cc: Russ Means, Senior Environmental Protection Specialist
Jeff Fugate, DRMS Minerals AGO

