



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

1313 Sherman Street, Room 215
Denver, CO 80203

May 21, 2018

David Mosch
Mosch Exploration & Mining, LLC
P.O. Box 1484
Idaho Springs, CO 80452

RE: Poorman Mine; DRMS File No. M-1982-058; Adequacy Review No. 1 (TR01)

Dear Mr. Mosch,

The Division of Reclamation, Mining and Safety (Division) received Technical Revision No. 1 for the Poorman Mine on May 1, 2018. The decision date for this Technical Revision is May 31, 2018. The Division has reviewed the Technical Revision Application and has the following comments:

1. The Operator has indicated explosives are stored in underground magazines. As required by Rule 6.3.6, please list the permits, licenses or approvals which the Operator has obtained in order to store and use explosives.
2. The permit boundary which is depicted on the Mining Plan Map and the Reclamation Plan Map encompasses an area of 3.21 acres. The Poorman Mine is permitted for 1 acre of disturbance. Therefore, the permit boundary on the Mining Plan and Reclamation Plan Maps must be revised to encompass an area of 1 acre. Pursuant to Rule 6.3.5(2), the Division considers the area bounded by the permit boundary to be analogous to the affected area.
3. The Operator has stated there is a historic road located at the base of the waste rock pile. The Division located a historic road utilizing Google Earth aerial photography, which is approximately 460 ft. south of the portal. Please clarify if this is the abandoned road which is referred to in the Mining Plan. As required by Rule 6.3.5(2)(c), please revise the Mining Plan Map to include an outline and label for the historic road. In addition, please note that all stormwater control features must be located within the defined permit boundary.
4. The Operator has stated stormwater runoff from the waste rock pile will be contained by a historic road located at the base of the waste rock pile. Please describe how the road will contain stormwater runoff. If the road serves as a physical barrier to the downhill flow of water, how will the Operator ensure stormwater does not follow the preferential path of the road and discharge to offsite areas? In addition, the Operator shall submit a cross-sectional drawing of the road which adequately demonstrates how the road will capture stormwater runoff from the waste rock pile.
5. The Operator has stated the waste rock pile will be constructed at the angle of repose (1.3H:1V), since the historic waste rock pile has been stable at this slope. In addition, the Operator has indicated the current slope of the natural hill side is at 2.22H:1V. The approved Reclamation Plan states the new dump areas affected by the operation would be recontoured to conform with the immediate terrain.

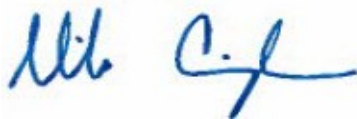


Therefore, the Division will require all newly constructed portions of the waste rock pile to be established at a slope no steeper than 2.2H:1V. Please revise the Reclamation Plan to reflect the waste rock pile will be constructed at 2.2H:1V. In addition, specify if the waste rock pile will be constructed at the approved final grade, or otherwise describe how the waste rock pile will be contoured during reclamation.

6. The Future Waste Disposal Area identified on the Mining Plan Map appears to be partially forested. Pursuant to Rule 3.1.9(2), woody vegetation at the site shall be removed from or appropriately incorporated into the existing topsoil. Please describe if the woody vegetation will be removed from the site or otherwise incorporated into the topsoil.
7. The Operator has indicated the A and B soil horizons are 1" to 4" thick. Pursuant to Rule 3.1.9(1), topsoil shall be removed and segregated from other spoil. Please specify the estimated depth to which soil, suitable as a plant growth medium will be salvaged from the Future Waste Disposal Area.
8. As required by Rule 6.3.4(1)(c)(i), state the thickness of plant growth medium which will be replaced over the top of the newly constructed portions of the waste rock pile.
9. The Operator has stated Aspen and Lodgepole Pine will be planted during reclamation. Please specify the total number of seedlings to be planted for each species or specify the number of each species to be planted on a per acre basis. This information is necessary to calculate the required financial warranty.

This concludes the Division's preliminary adequacy review of this Technical Revision. Please remember the decision date for this Technical Revision is May 31, 2018. If you are unable to provide satisfactory responses to any inadequacies prior to this date, it will be your responsibility to request an extension of time to allow for continued review of this Technical Revision. If there are still unresolved issues when the decision date arrives and no extension has been requested, the Technical Revision 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 "M.A. Cunningham".

Michael A. Cunningham
Environmental Protection Specialist