

---

# J. E. STOVER & ASSOCIATES, INC.

2352 NORTH 7<sup>TH</sup> STREET, UNIT B  
GRAND JUNCTION, COLORADO 81501  
PHONE: (970) 245-4101, FAX: (970) 242-7908

MINE ENGINEERING  
MINE RECLAMATION

CIVIL ENGINEERING  
CONST. MANAGEMENT

---

July 24, 2018

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

Re: Minrec Inc., North Thompson Creek Mines  
Permit Renewal No. 7, Preliminary Adequacy Review  
Permit No. C-1981-025

Dear Ms. Binns:

DRMS' letter received on July 9, 2018 transmitted the preliminary adequacy review for the current permit renewal. On behalf of Minrec, Inc. following are its responses to the DMRS' comments and concerns.

1. DRMS - As stated on page 4-ix, 2.98 acre remaining between the ponds will be subject to revegetation success standards. The balance of the reclaimed area, 1.91 acres, are approved permanent structures, not subject to the revegetation standards. Currently the permit describes sampling methodologies applicable to a much larger area, page 4-65i. The Division finds that the currently approved vegetation sampling methodology inappropriate for the remaining reclaimed area. Revision of the vegetation sampling methods to methods appropriate for a small area is needed. Specifically, 50 meter transects should be shortened to a length that will allow adequate sampling without transects crossing, or double sampling of the small 2.98 acre area. [Rule 4.15.7(2)(b)] This may best be handled with submittal of a technical revision.

NTC – The annual reclamation report maps show the 2.98 acres as being part of the developed water resource area. No further reclamation obligations should be necessary for these 2.98 acres because these areas support the permanent developed water resource area. See amended page 4-ix.

2. DRMS - Please update the discussion of the Noxious Weed Control plan on page 4-66 if the choice of herbicides have changed, as effective chemicals have come on the market.

NTC – Revised page 4-66 is attached.

3. DRMS - Update page 2-8 Section 2.03.8 regarding permit term (currently listed as 2008).

NTC – Revised page 2-8 is attached.

4. Minrec has no comment on the reclamation estimate.

Sincerely,

*J. E. Stover*

J. E. Stover, P.E.  
Consulting Engineer

Enclosures

#### 2.03.6(1)

Loadout:

The loadout has been released from the permit application package.

- (2) The applicant has no right to mine coal at the mine sites. The mines have been sealed and the disturbed areas reclaimed.

#### 2.03.7 Relationship to Areas Designated Unsuitable for Mining

The project area does not encompass any fragile or historic lands nor are there any natural hazards present which preclude the planned operations. The proposed permit area is not currently designated or under consideration as unsuitable for surface mining operations by either federal or state authorities.

#### 2.03.8 Permit Term Information

Mining activities have ceased. All facilities have been dismantled and the area has been reclaimed. It is anticipated the Mining Permit will be in effect for many years due to the mine drainage. The current permit is to be issued effective 2018 for a five year term.

### Disturbed and Affected Areas

The number of surface acres affected in the permit area at the time of approval of SL-06, partial Phase III bond release is tabulated below. The area affected by the No. 1 and No. 3 Mines is presented on Map D-3-21.

1.	Area affected by mining including angle of draw .....	407.0
2.	Current disturbed area (developed water resource area).....	4.8
	Total .....	411.8

### Reclamation Liability

Phase III reclamation liability for the 4.8 acre Developed Water Resources Area is comprised of:

- a. Approximately 2.98 acres that are between ponds (inter-pond areas) having no further reclamation obligations because these areas support the permanent developed water resource area.
- b. Approximate 0.98 acres aggregate area of the Long Pond, Pond T-1, Pond T-2 and Pond P-9 having no further reclamation obligations because they have been approved as permanent structures,
- c. Approximately 0.23 acres of pipelines that carry underground mine water from Mine No 1 and Mine No 3 to the Long Pond (including the manhole valve enclosure near the portal of Mine No 3, having no further reclamation obligations because they have been approved permanent structures).
- d. Approximately 0.7 acres comprised of the refuse pond and the open ditch from P-9 to the refuse pond. No reclamation obligations for the ditch and refuse pond since they have been approved as permanent structures,

### Disturbed and Affected Areas

The number of surface acres affected in the permit area at the time of approval of SL-06, partial Phase III bond release is tabulated below. The area affected by the No. 1 and No. 3 Mines is presented on Map D-3-21.

1.	Area affected by mining including angle of draw .....	407.0
2.	Current disturbed area (developed water resource area).....	4.8
	Total .....	411.8

### Reclamation Liability

Phase III reclamation liability for the 4.8 acre Developed Water Resources Area is comprised of:

- a. Approximately 2.98 acres that are between ponds (inter-pond areas) having no further reclamation obligations because these areas support the permanent developed water resource area.
- b. Approximate 0.98 acres aggregate area of the Long Pond, Pond T-1, Pond T-2 and Pond P-9 having no further reclamation obligations because they have been approved as permanent structures,
- c. Approximately 0.23 acres of pipelines that carry underground mine water from Mine No 1 and Mine No 3 to the Long Pond (including the manhole valve enclosure near the portal of Mine No 3, having no further reclamation obligations because they have been approved permanent structures).
- d. Approximately 0.7 acres comprised of the refuse pond and the open ditch from P-9 to the refuse pond. No reclamation obligations for the ditch and refuse pond since they have been approved as permanent structures,