



COLORADO

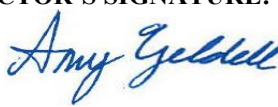
Division of Reclamation,
Mining and Safety

Department of Natural Resources

MINERALS PROGRAM INSPECTION REPORT

PHONE: (303) 866-3567

The Division of Reclamation, Mining and Safety has conducted an inspection of the mining operation noted below. This report documents observations concerning compliance with the terms of the permit and applicable rules and regulations of the Mined Land Reclamation Board.

MINE NAME: Apex Lode	MINE/PROSPECTING ID#: M-2014-011	MINERAL: Zinc and silver	COUNTY: Garfield
INSPECTION TYPE: Monitoring	INSPECTOR(S): Amy C. Yeldell	INSP. DATE: July 20, 2018	INSP. TIME: 10:30
OPERATOR: Strong Mining Company	OPERATOR REPRESENTATIVE: Ed & John Strong	TYPE OF OPERATION: 110(1) - Hard Rock Limited Impact	
REASON FOR INSPECTION: Memo Of Understanding	BOND CALCULATION TYPE: None	BOND AMOUNT: \$34,308.00	
DATE OF COMPLAINT: NA	POST INSP. CONTACTS: DRMS	JOINT INSP. AGENCY: U.S. Forest Service	
WEATHER: Clear	INSPECTOR'S SIGNATURE: 	SIGNATURE DATE: August 2, 2018	

GENERAL INSPECTION TOPICS

This list identifies the environmental and permit parameters inspected and gives a categorical evaluation of each. No problems or possible violations were noted during the inspection. The mine operation was found to be in full compliance with Mineral Rules and Regulations of the Colorado Mined Land Reclamation Board for the Extraction of Construction Materials and/or for Hard Rock, Metal and Designated Mining Operations. Any person engaged in any mining operation shall notify the office of any failure or imminent failure, as soon as reasonably practicable after such person has knowledge of such condition or of any impoundment, embankment, or slope that poses a reasonable potential for danger to any persons or property or to the environment; or any environmental protection facility designed to contain or control chemicals or waste which are acid or toxic-forming, as identified in the permit.

(AR) RECORDS----- <u>Y</u>	(FN) FINANCIAL WARRANTY----- <u>Y</u>	(RD) ROADS----- <u>Y</u>
(HB) HYDROLOGIC BALANCE----- <u>Y</u>	(BG) BACKFILL & GRADING----- <u>NA</u>	(EX) EXPLOSIVES----- <u>NA</u>
(PW) PROCESSING WASTE/TAILING---- <u>N</u>	(SF) PROCESSING FACILITIES----- <u>Y</u>	(TS) TOPSOIL----- <u>N</u>
(MP) GENL MINE PLAN COMPLIANCE- <u>Y</u>	(FW) FISH & WILDLIFE----- <u>Y</u>	(RV) REVEGETATION---- <u>Y</u>
(SM) SIGNS AND MARKERS----- <u>Y</u>	(SP) STORM WATER MGT PLAN---- <u>N</u>	(RS) RECL PLAN/COMP-- <u>N</u>
(ES) OVERBURDEN/DEV. WASTE----- <u>NA</u>	(SC) EROSION/SEDIMENTATION--- <u>N</u>	(ST) STIPULATIONS----- <u>Y</u>
(AT) ACID OR TOXIC MATERIALS----- <u>NA</u>	(OD) OFF-SITE DAMAGE----- <u>Y</u>	

Y = Inspected / N = Not inspected / NA = Not applicable to this operation / PB = Problem cited / PV = Possible violation cited

OBSERVATIONS

This inspection was conducted as part of the Colorado Division of Reclamation, Mining and Safety (Division) normal monitoring program. The Apex Lode is a 110(1) permitted site that includes a total of 3 acres on Forest Service land. This site is located 5 miles north of Glenwood Springs, CO and is accessed from Transfer Trail (Forest Service Rd 602). This was a multi-agency inspection. Olivia Garcia, Jason Gross and Amy Titterington represented the Forest Service. Rick Smythe and Erik Wayland represented the Colorado Department of Corrections. John and Ed Strong represented Strong Mining Company and accompanied Amy Yeldell of the Division on the inspection.

The Transfer Trail road has been improved since the previous inspection and is in considerably better shape than usual. With that being said the road is still a rough jeep trail with access for high clearance vehicles only. This factor should be taken into consideration with regards to reclamation and bonding. Equipment to be mobilized will be extremely limited and reclamation will largely be dependent on manual labor methods.

The mine identification sign and affected area boundary markers are in place and in compliance with Rule 3.1.12. The bottom of the mine sign has been eaten however it appears that all of the required information was displayed. This is not cited as a problem since it was of no fault to the operator. At the earliest convenience please repair or replace the sign. The permit boundary was delineated with t-posts that had been painted red to be highly visible.

The access road to the mine site is largely overgrown with native vegetation due to limited use. Overall the site is very lush due to its location. There were no weeds present and a high density of vegetation with the exception of the rock outcrop areas. The road and areas surrounding the cabin have self-reclaimed with volunteer native vegetation. The cabin on site is approximately 20 by 30 feet. It appears to be neat and in good working order. There is no excess material or debris around the cabin area.

Mining activity at this site primarily occurs during weekends in the summer. The site has limited seasonal access. There is no equipment or fuel on site. All work is done with hand tools. To date no extraction of zinc has occurred since permitted. Activity on site is related to improvements and mine infrastructure to support future mining operations.

There are two portals located to the southeast of the cabins. There are timbers and metal stored on the flat area between the two portals. All materials is neatly stored and organized. The materials are being used to sure up the lower portal and make repairs from there the slope above the lower portal eroded.

To access the lower portal one walks across a wooden boardwalk since the slope of the hill is quite steep. This boardwalk allows you easily traverse the hillside. There is limited working room at the mouth of the portal. An area approximately 6 by 10 feet is flat. Current work in this area has been to dig out the opening to the portal after the hillside slid and buried the portal. Excavated material is being pitched downhill but appears to be staying within the permit boundary. The Division would like to caution the operator in this activity given its potential to create an offsite impact. There are no stockpiles of ore on site at this time. The operator does not have Forest Service approval to mine, as there is no approved Plan of Operations in place. The portal opening work is being conducted under a Categorical Exclusion approval which expires this year.

The primary topic of discussion during this inspection was closure of the upper portal. To access this portal one uses the old rail tracks to cross the area that eroded and buried the lower portal. The span is approximately 10 feet. The operator mentioned possibly creating a bridge or repairing the slope to facilitate closure activities. The

upper portal also has slope stability issues. Ed Strong stated that prior to the hillside sloughing the opening was approximately 8 feet tall and went back 17 feet. At the time of the inspection the opening was approximately 2-3 feet tall and staff was unable to determine depth. Inspectors stood on material that fell over the entrance and partially backfilled the portal. Only the top of the portal opening remained visible. DOC staff frequently brought up the risk of continual rock fall during the portal closure activity and overall slope stability risk. Forest Service has determined that there are no bats and the audit is dry and not draining. Based on those conditions this portal is a good candidate for traditional backfill or PUF closure methods. Due to the lack of available backfill materials PUF is the recommended closure method by DOC. It was estimated that the work would take two days to complete.

The Divisions does not have a specific closure method on file. The operator will need to make a revision to the reclamation in the form of a technical revision. The technical revision needs to be approved prior to closure work being completed.

The Division currently requires a financial warranty amount of \$34,308 for this site. In an effort to ensure the Financial Warranty adequately, reflects the actual current cost of fulfilling the requirements of the approved reclamation plan the Division will be updating the reclamation cost estimate. If the current bond is found to be insufficient the Division will send a Notice of Surety Increase under a separate cover.

Responses to this inspection report should be directed to: Amy Yeldell at the Division of Reclamation, Mining and Safety, 1313 Sherman St., Room 215, Denver, CO 80203. Direct contact can be made by phone at 970-254-8511 or via email at amy.yeldell@state.co.us

PHOTOGRAPHS





Cabin within permit boundary, very little disturbance



Overview of area around cabin





View of boardwalk from lower portal



Lower portal now accessible and recently replaced timbers







Inspection Contact Address

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