

September 4, 2018

Peter Freedman
AuPt Industries LLC
P.O. Box 1424
Edwards, CO 81632



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

1313 Sherman Street, Room 215
Denver, CO 80203

RE: West Side Placer, File No. M-2016-081, Technical Revision (TR-1) Adequacy Review

Dear Mr. Freedman:

On August 28, 2018, the Division received a cover sheet and review fee for TR-01. No revision fee is required for a technical revision to a 110(2) permit and the check has been mailed back. On the cover sheet the Operator provided a brief description of what the revision is intended to address, but failed to include the full revision for the Division's review. As stated on the cover sheet, the Permittee is obligated to provide sufficient information for the Division to review and approve the revision, including updated mining and reclamation plan maps. These were not provided.

Pursuant to Rule 1.9.1, the Division is required to render a decision on TR-01 within 30 days of filing, by September 28, 2018. Please be informed, on September 28, 2018, the Division may determine TR-01 not adequate for approval and deny the revision unless the following adequacy issues are resolved to the Division's satisfaction.

Preliminary Adequacy Issues for TR-01

1. Please provide an updated Mining Plan and Mining Plan Map, fully describing any changes proposed through TR-01, and addressing the applicable requirements of Rules 6.3.3 and 6.3.5(2), as follows:

- a. Pursuant to Rule 6.3.3(1)(e), describe the rapid thickener and explain its function. Provide detailed descriptions and drawings of the physical structure and foundation for the structure. Locate and label the rapid thickener and all associated structures on the updated Mine Plan Map.
- b. Pursuant to Rule 6.3.3(1)(h), describe what effect the rapid thickener will have on the quantity and quality of water used by the operation. Describe the source of the additional water. Pursuant to Rules 3.1.5(5), (10), (11), and 3.1.6, describe how the process water will be used and disposed in a manner protective of hydrologic resources. Locate and label any/all water conveyance, storage and disposal facilities on the updated Mine Plan Map in accordance with Rule 6.3.5(2)(c).
- c. Pursuant to Rule 6.3.3(2)(a), describe the chemical types, quantities and concentrations to be utilized, chemical storage and spill containment and emergency response plans for onsite spills. Specify the tank capacities and operating solution volumes. The description of chemicals to be used or stored on site shall include the Material Safety Data Sheet (MSDS) for each chemical, if available. Locate and label any/all chemical storage, use, and disposal facilities on the updated Mine Plan Map in accordance with Rule 6.3.3(1)(m).



NOTE: The addition of processing chemicals to be used on site may alter the status of the operation to a Designated Mining Operation and subject to the requirements of Rules 6.4.21 and 7.

2. Please provide an updated Reclamation Plan and Reclamation Plan Map, fully describing any changes proposed through TR-01, and addressing the applicable requirements of Rules 6.3.4 and 6.3.5(3), as follows:

- a. Pursuant to Rule 6.3.4(1)(d), specify if any facilities and/or foundations for facilities will remain after reclamation. Locate and label permanent features and/or disposal locations for buildings and foundations on the updated Reclamation Plan Map.
- b. Pursuant to Rule 6.3.4(1)(e), specify the reclamation treatment and disposal of all chemicals and waste products. Pursuant to Rules 3.1.5(5), (10), (11), and 3.1.6, describe how the chemicals and waste products will be disposed in a manner protective of hydrologic resources. Locate and label onsite disposal locations for all processing chemicals and waste products on the updated Reclamation Plan Map.
- c. Pursuant to Rule 6.3.4(2), provide construction details of all structures to be demolished as necessary to verify the cost of demolition and disposal.

Subsequent to receipt and review of the Operator's response to these preliminary adequacy issues the Division may identify additional inadequacies with TR-01. Please respond to these preliminary adequacy issues by September 21, 2018. If the Operator needs additional time to respond please request an extension to the September 28, 2018 decision deadline.

Response to this correspondence 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

Sincerely,



Amy Yeldell

Environmental Protection Specialist

Ec:

Wally Erickson, Senior EPS, Grand Junction DRMS

Philip Courtney, Colorado State Land Board