

January 18, 2019

Mindy Miller
Titan AU, Inc.
1935 65th Ave.
Greeley, CO 80634



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

1313 Sherman Street, Room 215
Denver, CO 80203

RE: Box Creek Placer Mine, File No. M-2018-053, 112 Application Adequacy Review

Dear Mrs. Miller:

The Division of Reclamation, Mining and Safety (Division) is in the process of reviewing the above referenced application 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 issue(s) of concern shall be adequately addressed before the application can be considered for approval.

1. Pursuant to Rule 6.4.4 (f)(i), please provide the expected depth that mining will occur for each of the five proposed mining areas.
2. Pursuant to Rule 6.4.4 (g), please provide clarification regarding aggregate produced as a secondary commodity. On page D-8 of the application it states that aggregate may be sold as a byproduct. On page D-9 of the application it states that hauling will not occur, and on page D-13 it states that it is not anticipated that commercial gravel will be produced.
3. Please provide clarification regarding the maximum amount of area to be disturbed at any given time. Page D-10 of the application states that it will be 30 acres, page E-1 states that it will be 40 acres.
4. Please provide further details regarding the use of Hyperfloc at the site. Page D-5 of the application states that only water will be used in processing gold, however, discussion regarding flocculant use begins on page D-11. On page D-11 it states that the flocculant to be used will be biodegradable, however the MSDS provided states that the product is not readily biodegradable. Please provide further details regarding the amount of flocculant to be used and its potential effects to groundwater quality and the environment.
5. Rule 3.1.6(1)(a) requires that operations comply with all applicable Colorado water laws and regulations. State law requires that persons exposing groundwater through open mining obtain a well permit from the state engineer. Please commit to obtaining a well permit for the operation and a water court approved augmentation plan prior to exposing any groundwater at the site.
6. For the Xcel Energy power poles and BR Pipeline, pursuant to Rule 6.4.20 (c), please provide a notarized letter, on the utility company letterhead, from the owners of the utility, stating that the mining and reclamation activities, as proposed, will have no negative effect on the utility.



Please submit your response(s) to the above listed issue(s) by Friday, February 01, 2019 in order to allow the Division sufficient time for review.

The Division will continue to review your application and will contact you if additional information is needed.

If you require additional information, or have questions or concerns, please contact me at the Division's Grand Junction Field Office.

Sincerely,



Dustin Czapla

Environmental Protection Specialist
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Division of Reclamation, Mining and Safety
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Cc: Katie Todt, Greg Lewicki and Associates