



COLORADO

**Division of Reclamation,
Mining and Safety**

Department of Natural Resources

1313 Sherman Street, Room 215
Denver, CO 80203

February 27, 2019

H. Bruce Humphries
Regulatory Permits Management, Inc.
25049 E. Alder Dr.
Aurora, Colorado 80016

**RE: Old Town Reclamation Project, M-2018-057, 110d application
Adequacy Review No. 2**

Dear Mr. Humphries,

The Colorado Division of Reclamation, Mining, and Safety (“DRMS” or “Division”) has reviewed the above referenced application adequacy review response material received by the Division on February 25, 2019. The Division is required to issue a decision on the application by March 15, 2019. The following adequacy review items were identified in the original DRMS adequacy review letter. The applicant’s response to these items are noted along with the Division’s response to these issues. If an item was resolved it has been removed. Please address the following items:

Exhibit B - Rule 6.3.2, Site Description

1. Please submit the wildlife statement prepared by the Colorado Parks and Wildlife (formally known as Colorado Division of Wildlife) in accordance with Rule 6.3.2(d).
 - a. **Applicant response:** When they receive Colorado Parks and Wildlife comment, they will supply them to DRMS.
 - b. **DRMS response:** This item remains outstanding at this time. DRMS has also reached out to Colorado Parks and Wildlife in an attempt to obtain the required statement.

Exhibit L – Rule 6.3.12, Permanent Man-Made Structures:

15. In accordance with Rule 6.3.12, please provide information sufficient to demonstrate that the stability of any structures located within two hundred (200) feet of the operation or affected land will not be adversely affected.
 - a. **Applicant Response:** We will supply compensation agreements for all permanent, man-made structures within 200 feet of the affected land.
 - b. **DRMS Response:** Please submit completed structure damage reimbursement agreements for the following structures:
 - i. Shaft Head Gear and Ore Bin
 - ii. Pre-existing Historic Mine Road (see previous adequacy review)



February 27, 2019

- c. **Applicant Response:** Enclosed are compensation agreements for the shaft head gear, ore bin, and the historic Old Town Mine Road.
- d. **DRMS Response:** The applicant only submitted one structure agreement for the historic Old Town Mine Road between Venture Resources, Inc. and Old Town Mine, LLC. However, Exhibit L indicates there are four additional owners of this road. Please either submit completed structure agreements for the road with all of the owners or provide information sufficient to demonstrate that the stability of the road will not be adversely affected

This concludes the Division's third adequacy review of the application. As indicated above, the Division is required to issue a decision on the application by March 15, 2019. If you need additional time to address the adequacy review items listed above, you will need to request an extension of the decision date.

If you have any questions feel free to contact me at (303) 866-3567, extension 8120.

Sincerely,



Jared Ebert
Environmental Protection Specialist III

EC: Mr. Patrick Maher, mptmaher@outlook.com