

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

1313 Sherman Street, Room 215 Denver, CO 80203

June 21, 2018

Climax Molybdenum Company Attn: Ray Lazuk Highway 91, Fremont Pass Climax, Colorado 80429

## RE: Climax Mine, M-1977-493 Reclamation Cost Estimate, Follow-up Questions

Dear Mr. Lazuk,

The Colorado Division of Reclamation, Mining, and Safety (Division) is nearing completion of the review of the reclamation cost estimate submitted by Climax Molybdenum Company (Climax) on November 21, 2016. The Division requests that Climax address the following:

- A. The reclamation cost estimate submitted by Climax at the end of 2016 proposes to leave a number of structures in place to facilitate water treatment post-mining and some facilities to be repurposed as an industrial complex in the Mine/Mill area for outside entities such as CDOT and/or Lake County. The following is a list of structures that were included in the Amendment No. 6 (AM06) cost estimate but were not included in the 2016 cost estimate. Please review the list of structures and clarify which of these structures have already been demolished, will remain for water treatment, proposed to be re-purposed for industrial use or were never built. For structures Climax is proposing to re-purpose as an industrial complex for outside entities (not including those structures needed for water treatment), please provide the Division evidence the proposed entities have committed to taking control of these facilities upon completion of operations at the site. If this documentation cannot be provided, the Division will need to hold enough financial warranty to demolish these structures including their floors and footings.
  - 1. Arkansas Pump House superstructure
  - 2. 5 Shaft Head Frame
  - 3. Storke Waste Water Treatment Plant
  - 4. 2 Crusher Main Shop superstructure
  - 5. No. 5 Crusher superstructure
  - 6. C-1400 Trans. Structure superstructure
  - 7. Bulk fuel service building superstructure
  - 8. Bulk Fuel Foam House superstructure
  - 9. Open Pit Water Station
  - 10. Domestic Water Plant
  - 11. 2 Mill. Gall. Tank #2 superstructure



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- 12. 2 Mill. Gall. Tank #1 superstructure
- 13. New Gas Storage Tank superstructure
- 14. No. 2 Crusher superstructure
- 15. 2 Crusher Switch House superstructure
- 16. PRECON superstructure
- 17. Drying plant superstructure
- 18. Packing plan superstructure
- 19. No. 1 Thickener superstructure
- 20. No. 2 Thickener superstructure
- 21. 3 Mill Building superstructure
- 22. Transport garage superstructure
- 23. Telephone building superstructure
- 24. C-1600 Trans. Structure superstructure
- 25. C-1500 Trans. Structure superstructure
- 26. Regrind building superstructure
- 27. Lime sodium silicate superstructure
- 28. Mill Tank Valve House 1- superstructure
- 29. Mill Tank Valve House 2 superstructure
- 30. Ore bin superstructure
- 31. Reagent Storage Building superstructure
- 32. No. 2 Crusher Ducon superstructure
- 33. Transport Fuel Tanks superstructure
- 34. C-1300 Trans. Structure superstructure
- 35. 6 Crusher Office superstructure
- 36. C-1200 Tans. Structure superstructure
- 37. Moly Warehouse superstructure
- 38. Sample Prep-house superstructure
- 39. No. 3 Thickener superstructure
- 40. Gatehouse superstructure
- 41. 27-26 Transfer superstructure
- 42. 2 CR Dust Collector superstructure
- 43. P255 Building superstructure
- 44. 45 Drive Building superstructure
- 45. 20 K Bin superstructure
- 46. 29A/30 Trans. Tower superstructure
- 47. No. 28 Rotoclone superstructure
- 48. 48 Rotoclone superstructure
- 49. Phillipson MAPP Gas House superstructure
- 50. Open Pit fuel Tanks superstructure

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- 51. Shovel re-build shop superstructure
- 52. Domestic Water Tank superstructure
- 53. OP Pit Fuel Pump House superstructure
- 54. Phillipson Warehouse superstructure
- 55. Open Pit Phase 1 Shop superstructure
- 56. Open Pit offices superstructure
- 57. Open Pit Phase 2 Shop - superstructure
- 58. Open Pit Washbay superstructure
- 59. CAVR asbestos FLT HS. superstructure
- 60. McNulty Pump Station superstructure
- 61. 4 Dam Seep Building superstructure
- 62. Robinson Pump station superstructure
- 63. Mayflower Pump station superstructure
- 64. Property Line Flumes superstructure
- 65. All Asphalt Roads and Lots (see AM06 estimate, Demolition No. 2 task)
- 66. Mayflower Pump Substation superstructure
- 67. Mayflower Swithyard Substation superstructure
- 68. 3 Mill Substation superstructure
- 69. Robinson Pump Substation superstructure
- 70. McNulty Switchyard Substation
- 71. McNulty Substation
- 72. Warren Pump Station Substation
- 73. Grind building
- 74. Flotation building
- 75. Administration building
- 76. Warehouse building
- 77. Explosive Storage (Old Box Cars 3)
- 78. Warren's pump station
- 79. Clarifier Cone
- 80. 3 Dam pump station
- 81. Small Out-building at 3-Dam Pump Station
- 82. Train Shack at Ten Mile North Portal
- B. The AM06 cost estimate included the demolition of a number of roads and parking lots. Based on your response to the item above, please re-evaluate the "Demolition 2- Linear Facilities" task in the cost estimate. If a structure listed above has an associated road or parking lot and should be included in the reclamation cost estimate for demolition please update the "Demolition 2-Linear Facilities" task as necessary.

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C. The Division noted a significant reduction in the "Mine Mill Complex" reclamation task given the assumption a number of facilities, roads and parking lots will remain post mining. Based on your response to the items above please re-evaluate this task and update it as necessary.

The Division requests that Climax provide a response to these items by July 24<sup>th</sup>, 2018. If you have any questions feel free to contact me at (303) 866-3567, extension 8120.

Sincerely,

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Jared Ebert Environmental Protection Specialist III