



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

November 20, 2019

Bryan Lees  
Colorado Calumet Co., Inc.  
PO Box 1169  
Golden, CO 80402

**RE: Second Notice of Filing Deficiencies, 110(1) to 110(2) Hardrock Conversion Application (CN-01)  
Detroit City Mine, Permit File No. M-2017-003**

Dear Mr. Lees,

On November 18, 2019, the Division of Reclamation, Mining and Safety (Division) received your response to the Division's Notice of Filing Deficiencies letter dated October 16, 2019. Pursuant to Rule 1.4.1(8), the Division has still determined the 110(1) to 110(2) Conversion Application (CN-01) for the Detroit City Mine, Permit File No. M-2017-003, contains deficiencies which prevent the application from being considered filed. The following filing deficiencies must be addressed before the Division can consider the application as being filed and the technical adequacy review can begin. Please respond to this Second Notice of Deficiencies with the requested information and summarize each response to the numbered items below, in a cover letter titled "Response to Second Notice of Deficiencies CN-01, M-2017-003".

**Application Form and General Application Process**

9. The Primary Mine Entrance Coordinates provided on Question 11, Page 3 of the revised application, are still not accurate. These coordinates also do not match the entrance coordinates provided on Figure A-1 Location Map within Exhibit A, which are accurate. Please submit a new Application Page 3 with the correct entrance coordinates.

**EXHIBIT I - Proof of Filing with County Clerk (Rule 6.3.9):**

10. Please confirm the maps provided to the Division in the October 1, 2019 submittal of CN-01 are included in or with the revised application placed with the local County Clerk and Recorder for public review on November 6, 2019.
11. Any changes or additions to the application on file with the Division, must also be reflected in the public review copy in accordance with Rule 1.6.2(2). Please submit proof that the public review copy has been updated with a copy of this letter and associated response.

Your 110(1) to 110(2) Conversion Application will not be considered filed until the information listed above is received and found sufficient to begin our review. A decision date will be established 30 days from the date of receipt and acceptance of all of the requested information. Additionally, if you have already published notice you will need to republish notice, but only after the Division considers the application filed; the Division will notify you when you should initiate publication of your notice. This notice must be published once within ten (10) days of the date your application is considered submitted. The final date for receiving comments is the 10th day after the publication or the next regular business day.



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Pursuant to Rule 1.4.1(8), you have sixty (60) days from the date of the first Notice of Deficiencies letter to submit all necessary documents that the Division needs for an application to be considered filed. If, at the end of the sixty day period, the application has not been determined to be filed with the Division, the Division may deny the application and terminate the application file. **The response to this Second Notice of Filing Deficiencies is due on or before December 16, 2019.**

This letter shall not be interpreted to mean that there are no other deficiency or adequacy requirements in your application. The Division will review your application to determine whether it is adequate to meet the requirements of the Act after submittal of all required items.

If you need additional information or have any questions, please contact me at Division of Reclamation, Mining and Safety, 1313 Sherman Street, Room 215, Denver, CO 80203, by telephone at **303-866-3567 x8132**, or by email at [elliott.russell@state.co.us](mailto:elliott.russell@state.co.us).

Sincerely,

A handwritten signature in blue ink, appearing to read "E. Russell", is positioned above the printed name.

Elliott R. Russell  
Environmental Protection Specialist

ec: Jason Musick with DRMS, [jason.musick@state.co.us](mailto:jason.musick@state.co.us)  
Ben Langenfeld with Greg Lewicki and Associates, [benl@lewicki.biz](mailto:benl@lewicki.biz)