



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

December 18, 2019

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

**RE: Adequacy Review, 110(1) to 110(2) Hardrock Conversion Application (CN-01)
Detroit City Mine, Permit File No. M-2017-003**

Dear Mr. Lees,

The Division of Reclamation, Mining, and Safety (Division) has reviewed the content of the 110(1) to 110(2) Conversion Application (CN-01) for the Detroit City Mine, Permit File No. M-2017-003, and submits the following comments. **The Division is required to make an approval or denial decision on the application no later than December 26, 2019; therefore, a response to the following adequacy review concerns should be submitted to the Division as soon as possible.** Please respond to this Adequacy Review with the requested information and summarize each response to the numbered items below, in a cover letter titled "Adequacy Review Response CN-01; M-2017-003".

The review consisted of comparing the application content with specific requirements of Rules 1, 3, 6.1, 6.2, and 6.3 of the Mineral Rules and Regulations of the Colorado Mined Land Reclamation Board for Hard Rock, Metal, and Designated Mining Operations. Any inadequacies are identified under the respective exhibit heading.

GENERAL APPLICATION PROCEDURES

1. As required by Rule 1.6.2, please submit proof of publication in a newspaper of general circulation in the locality of the proposed mining operation.
2. As required by Rule 1.6.2, please submit proof of the notice to all owners of record of surface and mineral rights of the affected land and the owners of record of all land surface within 200 feet of the boundary of the affected land. Proof of notice may be return receipts of a Certified Mailing or by proof of personal service.
3. To date, the Division has received comments from the Park County Development Services, Division of Water Resources, Colorado Parks and Wildlife, Corps of Engineers, and the Office of Archaeology and Historical Preservation. The letters are attached for your review. Please acknowledge and address any comments noted in the letters and make changes to the application as necessary.

6.3 SPECIFIC PERMIT APPLICATION EXHIBIT REQUIREMENTS –110 LIMITED OPERATIONS

EXHIBIT B - Site Description Plan (Rule 6.3.2)

4. Within the original Exhibit B, the Applicant lists the haul road culvert, haul road, and County Road 8 as the only structures within 200 feet and that all are owned by Sweet Home Rhodo. After further discussions with the Applicant, it appears the ownership of County Road 8 has been transferred to the Town of Alma since the original application submittal date. Additionally, with the proposed expansion there is a building along County Road 8 that is now within 200 feet of the permit boundary. In accordance with Rule 6.3.2(b), please



December 18, 2019

Page 2 of 2

update Exhibit B - Section 4 by identifying all structures within 200 feet of the permit boundary and the owner of each structure. Please also update one of the Exhibit E maps to depict each structure and structure owner as required by Rule 6.3.5(2)(b).

EXHIBIT E - Maps (Rule 6.3.5)

5. Please revise the Map C-2 Mining Extents to include the existing/proposed topography of the Usable Pad Area located south of the Waste Rock Landform. Please also revise this map to include the existing/proposed topography of the portal pad areas.
6. Please extend the A-A' cross section on Map C-3 Cross Section to include the Usable Pad Area and B-B' cross section on Map C-4 Underground Workings to include the portal pad and secondary escape features.
7. In accordance with Rule 6.3.5(3)(a), please revise Map F-1 Reclamation Plan to show the proposed final topography of the Usable Pad Area and portal pad areas, similarly as the Waste Rock Landform is shown.

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

8. Any changes or additions to the application on file with the Division, must also be reflected in the public review copy. Please submit proof that the public review copy has been updated or a copy of the response to this adequacy letter has been added to it.

EXHIBIT L - Permanent Man-Made Structures (Rule 6.3.12)

9. Please submit structure agreement forms for all man-made structures within 200 feet of the permit boundary as required by Rule 6.3.12(a). The Division has included the form and will need one to be executed for County Road 8 and another for all structures owned by Sweet Home Rhodo.

This concludes the Division's adequacy review of this application. This letter shall not be interpreted to mean that there are no other technical deficiencies in your application; other issues may arise as additional information is supplied. Please be advised the Detroit City Mine permit conversion application may be deemed inadequate, and the application may be denied on December 26, 2019, unless the above mentioned adequacy review items are addressed to the satisfaction of the Division. **If more time is needed to complete the reply, the Division can grant an extension to the decision date. This will be done upon receipt of a written waiver of the Applicant's right to a decision by December 26, 2019, and the request for additional time. This must be received no later than the deadline date.**

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.

Sincerely,



Elliott R. Russell

Environmental Protection Specialist

ec: Jason Musick with DRMS, jason.musick@state.co.us
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