



COLORADO
**Division of Reclamation,
Mining and Safety**
Department of Natural Resources
1313 Sherman Street, Room 215
Denver, CO 80203

March 9, 2020

Mr. Brad Janes
Varra Companies, Inc.
8120 Gage Street
Fredrick, Colorado 80516

**Re: Varra Companies, Inc., Parcel 122, File No. M-2015-033,
Technical Revision No. 2 (TR-02) Adequacy Review**

Mr. Janes:

The Division of Reclamation, Mining and Safety (Division/DRMS) reviewed the contents of the technical revision (TR-02) for the Parcel 122 site submitted on February 28, 2020 and submits the following comments. The Division is required to make an approval or denial decision no later than March 30, 2020 therefore; a response to the following adequacy review concerns should be submitted to the Division as soon as possible.

1. The Operator submitted a drawing of slope profiles for five (5) slopes; Slope #1, Slope #2, Slope #3, Slope #4 and Slope #5. Additionally, the Operator submitted stability analysis using STABL software for four (4) slope profiles; Worst Case 1.25H:1V Slope, Profile #1, Profile #3 and Profile #5.

The stability analysis for Profile #3 appears to be mislabeled and should be labeled as Profile #4, based on the slope profile drawings submitted by the Operator. Please explain this discrepancy and provide a stability analysis for Slope #3 and/or relabel the profile provided as Profile #4. Additionally, please explain why all five (5) slope profiles were not analyzed by the Operator.

The Division will verify the Applicant's stability analysis models using Clover Technology's Galena v7.2 slope stability software following the Applicant's response to this letter.

Please be advised the technical revision for the Parcel 122 site may be deemed inadequate, and the revision may be denied on March 30, 2020, unless the above mentioned adequacy review items are addressed to the satisfaction of the Division.



If you have any questions, please contact me at peter.hays@state.co.us or (303) 866-3567 Ext. 8124.

Sincerely,

A handwritten signature in blue ink, appearing to read 'P. Hays', with a long horizontal flourish extending to the right.

Peter S. Hays
Environmental Protection Specialist

Ec: Jared Ebert; DRMS