



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

March 25, 2020

Ms. Amber Parmet  
Climax Molybdenum Company  
P.O. Box 68  
Empire, CO 80436

**Re: Climax Molybdenum Company; Henderson Mine; File No. M-1977-342;  
Technical Revision No. 29 (TR-29); 3 Dam Buttress (Stage 1) As-Built and Engineering  
Certification Adequacy Review**

Ms. Parmet,

The Division of Reclamation, Mining and Safety (Division/DRMS) reviewed the content of as-built drawings and engineering certification for the 3-Dam Buttress Project – Stage 1, Technical Revision No. 29 (TR-29), received on March 20, 2020 and submits the following comments.

1. The construction drawing set submitted with the technical revision dated 9/21/2017 labeled the cross-sections as 3N/11, 3A/10, 2N/10 and 2/9 from north to south on the Buttress Plan, Stage 1, Overall Site Plan map. The cross-sections on the As-Built Drawings Overall Site Plan map revision dated 10/25/19, labels the cross-sections as 3N/6, 3A/5, 2N/4 and 2/3 from north to south. Please explain the nomenclature discrepancy and revise the as-built drawings accordingly.
2. The As-Built Drawings include the final 2019 surface elevations for the buttress material, however the drawings do not include details for the placement and as-built elevations for the filter material. Additionally, the as-built drawings eliminated many details for the 1.5 foot thick filter material and other construction details for the buttress project which were included on the original construction drawings. Please explain these discrepancies and revise the as-built drawings accordingly.

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

Sincerely,

Peter S. Hays  
Environmental Protection Specialist

Ec: Jared Ebert; DRMS

