



1313 Sherman Street, Room 215  
Denver, CO 80203

1 April 2020

Graham Roberts  
Trapper Mine, Inc.  
P.O. Box 187  
Craig, Colorado 81626

**RE: Trapper Mining Inc, Permit; C1981010**  
**Adequacy Review, Preliminary: 2019 Annual Reclamation Report and TR125**

Dear Mr. Roberts

The Colorado Division of Reclamation, Mining and Safety (The Division) received Trapper Mine's 2019 Annual Reclamation report (2019 ARR), TR124 on 16 March 2020. The report contains all the information required by Rule 2.04.13(1) and (2), and The Division found the application complete on 18 March 2020. Upon field verification of the 2019 post mining topography (PMT), the map Map 1 becomes the official Annual Reclamation Map. Additional adequacy questions may be posed to TMI as a result of the field verification process.

The reclamation summary table; Table 1 Section 1, summarizes all reclamation activities achieved in 2019. The report indicated that 77.2 acres in the N Pit area comprised redisturbance associated with reopening up the NPit for mining. Backfilled, graded, topsoiled and seeded areas comprised 196.7 acres. No temporary seeding occurred.

Bond release inspections for SL 18 Phase I (175.3 acres), and SL 19 Phase II (376.1 acres), releases took place 29 and 30 August 2017 respectively. For these bond releases the decisions were issued August 2019 and December 2019 respectively. Therefore, during 2019, Trapper received two bond release approvals.

**Rule 2.04.13(1:)**

The name and address of the permittee is provided.



- (a) The location and number of acres disturbed during 2019 are discussed in Section 1.2.1 in Appendix W. Trapper redisturbed 77.2 acres in the former A Pit, now renamed the N Pit. These acres represent previously reclaimed lands.
- (b) The location and number of acres backfilled and graded during 2019 are discussed in Section 1.2.2 and depicted on Map 1 of Appendix W, the *Annual Reclamation Report Map*. Trapper backfilled and graded approximately 196.7 acres of land to final contour in 2019 representing 117.8 acres in L Pit and 78.9 acres in F Pit.
- (c) The location and the number of acres topsoiled during 2019 are discussed in section 1.2.3 and depicted on Map 1 2019 the *Annual Reclamation Report Map* of Appendix W. The number of acres coincides with the number of acres backfilled and graded.
- (d) Trapper permanently seeded 196.7 acres of land in 2019, corresponding to the areas backfilled and graded. The location and the number of acres seeded during 2019 are discussed in section 1.2.4 and depicted on Map 1 of Appendix W. Trapper included an invoice from Stevenson Intermountain Seed, Inc. in Section 7 of Appendix W illustrating the seeds used for reclamation.
- (e) Section 1.2.5 of Appendix W discusses the cultural practices conducted in 2019.
- (f) Map 1 of Appendix W depicts all previously planted parcels at the site. Each parcel identifies the acres and the year seeding occurred.

**Rule 2.04.13 (2):**

Section 3 of the report indicates that improvements and repairs were conducted on reconstructed drainages. New drainages constructed in 2019 represent approximately 4,237 linear feet. These drainages were constructed in L Pit and the Flume Gulch Drainage. Drainage repairs or improvements were completed on approximately 3,530 34,102 linear feet in 2019.

Table 5-1 in Section 5 of Trappers report provides geographic locations for each of the topsoil stockpiles and the approximate volume stored in each pile. Topsoil stockpiles are depicted on Map M1 in Appendix W.

Stock tanks and dozer basins were updated through 2019 as per Section 6.0 of the report.

In accordance with section 3.6.3.5 of Trapper's permit, they must provide the Division with the proposed list of plant species to be used each year. It appears the number of species for plant

type (grasses, forbes and, shrubs) and the amount of seeds to be applied are in accordance with Trapper's approved seed mixtures.

The permitting actions in the table below corroborate both DRMS and TMI records showing either, released acreage through bond release or, added disturbed acres as follows:

<i>Permitting</i>		
<i>Action</i>	<i>Acre</i>	
SL19	376.1	Ph II
SL18	175.3	Ph I
		admin
TR122	21.31	addition
N Pit	77.2	redisturbance

The Division reviewed the above referenced report, found it **adequately** meets the Rules cited above, and currently has no adequacy questions.

Please call me at 303.906.3886 with any questions or concerns.

Best Regards,



Robin Reilley, M.S. GISP  
Environmental Protection Specialist II