



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

1313 Sherman Street, Room 215
Denver, CO 80203

June 12, 2020

Seneca Property, LLC.
Attn: Miranda Kawcak
29515 Routt County Road #27
Oak Creek, Colorado 80467

RE: Seneca II-W Mine, DRMS Permit No. C-1982-057, 2019 Annual Reclamation Report Review

Dear Ms. Kawcak,

The Colorado Division of Reclamation, Mining and Safety (DRMS or Division) received the 2019 annual reclamation report for the above referenced mine site on March 26, 2020. The report was reviewed by DRMS for compliance with Rule 2.04.13. Items that will need to be addressed by Seneca Property, LLC. ("SPL") are shown below in **bold** text. DRMS finds the following:

- (1) The report was received on March 26, 2019 prior to the March 30th deadline approved in the permit as allowed by Rule 2.04.13(1).
- (2) The name and address of the permittee as well as the permit number for the site was included on the annual reclamation report form in accordance with Rule 2.04.13(1)(a).
- (3) No acres were reported to have been disturbed during the report year. Rule 2.04.13(1)(b) is complied with.
- (4) No acres were reported to have been backfilled and graded during the report year. Rule 2.04.13(1)(c) is complied with.
- (5) No acres were reported to have been topsoiled during this report year. **The number of acres reported to have been topsoiled cumulatively exceeds the number of acres reported to have been backfilled and graded, please explain this discrepancy and revise the annual reclamation report form accordingly.**
- (6) No acres were reported to have been seeded during this report year. Rule 2.04.13(1)(e) is complied with.
- (7) SPL reports that 736.91 acres was added to the seeded acres with 10 years or greater of growth bringing the total acres in this category to 1,198.61 acres. **Please submit a map that depicts the location, number of acres and date of planting for all previously revegetated areas in accordance with Rule 2.04.13(1)(f).**
- (8) SPL also provided additional monitoring information as required by the approved permit. This included history of soil stockpile volumes, history of vegetation sampling and monitoring, weed control information, grazing information, history of pond surveys, and wildlife monitoring.



Additional Annual Report Review Adequacy Items:

These items were identified in the 2014, 2015 and 2016 ARR reviews by the Division and does not appear to have been addressed with the 2017, 2018 or the 2019 annual reclamation reports. Please address the following:

- a) During a review of the 2014 annual reclamation report ("ARR"), the Division identified a number of discrepancies associated with the Chronologic Seeding Map. These discrepancies are noted as:
 - a. The parcel located immediately to the east of Pond 016, Seneca Property personnel submitted photos to the Division, dated October 9, 2013, documenting seeding with the perennial seed mix for this parcel. The Division considers that the 2014 Chronologic Seeding Map should note this parcel as having been seeded in 2013. The map submitted to DRMS with the 2014 ARR (also the 2015, 2016, and 2018 ARR), denoted this parcel as "0", indicating that it had not been seeded at the end of 2014.
 - b. Stock tank T-22 should be included within the disturbance area boundary on the north side of Haul Road G.

This concludes the Division's review of the 2019 annual report. The Division requests that SPL address the adequacy review items noted above by **July 6, 2020**. If you have any questions, please contact me at Jared.Ebert@state.co.us or (303) 866-3567 ext. 8120.

Sincerely,



Senior Environmental Protection Specialist
Division of Reclamation, Mining and Safety

cc: Robin Reilley, DRMS