

COLORADO OPERATIONS Henderson Mine and Mill P.O. Box 68 Empire, CO 80438 Phone (303) 569-3221

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February 9, 2021

Sent Via Email and ePermitting Submission System

Mr. Peter Hays Division of Reclamation Mining and Safety 1313 Sherman St., Rm. 215 Denver, CO 80203

RE: Climax Molybdenum Company, Henderson Mill, Permit No. M-1977-342, Technical Revision 33, Expansion of Mill-EPF 1.5 – Seep Water Collection and Return System

Dear Mr. Hays:

The Henderson Mill is submitting this Technical Revision to Permit No. M-1977-342 for an expansion of Mill EPF 1.5 – Seep Water Collection and Return System. This expansion consists of an engineered storage area for materials that are excavated from the seep canals associated with the EPF.

Currently, excavated materials from the seep water canals are stored on the south side of the Seep Water Collection and Return System EPF for drying. The water contain in these materials drains back into the seep water collection system and is pumped to the surface of the tailing storage facility (TSF) by the Ute Park Pump Station. The dried materials are then used on the face of the TSF to repair erosion caused by rain events and snowmelt runoff. The storage area was utilized for this purpose due to the convenience of being located within the footprint of the EPF. However, it has not been ideal as the area doesn't drain well and is not set up properly for loading of materials into trucks for placement on the TSF. It was determined that a new material storage area was needed.

This new storage area, called the Seep Spoils Storage Area, was constructed near the base of 1-Dam on the north side of the EPF where conditions were more ideal. The slope of the ground allowed water to drain into the seep collection system and it was constructed to allow for proper loading of haul trucks. Although construction of the berm and drainage system has already been completed, tailing material has not yet been placed in it. In conversations with you during your June and July Mill inspections, it was requested that Henderson produce as-built drawings and ground investigations to ensure that water draining from the excavated materials will be captured in the EPF. Accompanying the following narrative description are asbuilt drawings by W.W. Wheeler & Associates, Inc. (Attachment 1) and geologic cross-sections and test pit data by Ajax and Clear Creek Associates.

In August, Henderson excavated and logged eleven (11) test pits to investigate geology and hydrologic conditions in the vicinity of the proposed Seep Spoils Storage Area. Five of the test pits (TP-1, TP-2, TP-3, TP-4, and TP-11) were located within or near the bermed area. The other six test pits were located to the east and investigated the extent of the Quaternary alluvial/glacial sediments (Qd) aquifer. The locations and surface elevation of the test pits and proposed facility are shown on Figure 2 (Attachment 2). The excavation depths of the test pits ranged from 2 $\frac{1}{2}$ feet to 13 feet. The test pits located nearest the proposed Seep Spoils Storage Area were shallower due to the occurrence of competent unweathered bedrock nearer the surface (Attachment 3).

The five test pits located near the bermed area encountered either Tertiary Troublesome Formation and/or the Precambrian Idaho Springs Formation (Xg). The Troublesome Formation (Tt) consists of semi-

consolidated claystone or siltstone. The Precambrian Idaho Springs Formation (Xg) consists of biotite gneiss and migmatite. The upper Xg surface was weathered to depths of two to four feet. All five test pits were dry. Based on prior analyses and observations, the Tt and the Xg, in the vicinity of 1-Dam have very low permeability.

Of the six test pits excavated east of the proposed Seep Spoils Storage Facility, two (TP-8 and TP-9) encountered Tt without encountering Qd sediments. The other four test pits bottomed in Qd sediments; however, the sediments were dry. Based on the findings of the test pits, the extent of Qd sediments is delineated to be south and east of the proposed facility, whereas the Seep Spoils Storage area is entirely constructed on low-permeability Tt and Xg.

Cross-sections A-A' and B-B' (presented in Figures 3 and 4 – Attachment 2), illustrate the topographic slope (graded to the southeast) and subsurface geology along with key features of the proposed Seep Spoils Storage Area. The cross sections show how the topography and geology will convey any stormwater and seepage draining from the stored materials to the filter drain and through the drainpipe outfall to the Seepwater Collection and Return System. It is unlikely any seepage would migrate outside of this flowpath; but if it did, the low permeability Tt claystone/siltstone would restrict further migration.

Henderson will not store materials in the Seep Spoils Storage Area until final approval by DRMS. In the meantime, please let me know if you need any additional information to complete your review of this submittal.

Regards,

Geoff Niggeler Chief Environmental Engineer Henderson Operations Climax Molybdenum Company

Enc.

Attachment 1 – W. W. Wheeler & Associates, Inc. – Seep Spoils Storage Facility As-Built Drawings & Engineering Certification
 Attachment 2 – Ajax/Clear Creek Associates – Test Pit and Geologic Data Figures
 Attachment 3 – Ajax/Clear Creek Associates – Test Pit Field Logs and Photographs

cc: Miguel Hamarat, Climax

SEEP SPOILS STORAGE FACILITY HENDERSON MILL

PARSHALL, CO



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DRAWING NO. DRAWING TITLE COVER SHEET, DRAWING INDEX, AND LOCATION MAPS G1 GENERAL ARRANGEMENT - SITE PLAN G2 C1 AS-BUILT - PLAN VIEW AS-BUILT - PROFILE, SECTIONS, AND DETAILS C2



DRAWING INDEX

LOCATION MAP

Scale in Miles









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Legend

- Test Pit
- Phase I Extraction Well \bullet
- **Monitor Well**
- Approximate Northwestern Extent _ __ of Qd Formation
- Ultimate Canal
- Canal
- Intermittent Surface Water
- Access Road









Test Pit Location and Survey Elevation (feet amsl) •

Topographic Index Contour (contour interval = 5 ft)

Minor Topographic Contour (contour interval = 1 ft)

- Cross Section Trace
- ___. Approximate Northwestern Extent of Qd Formation
 - Ultimate Canal
 - Access Road



SCALE: 1 inch: 100 feet

Service Layer Credits: Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community Imagery from USDA NAIP Natural Color Imagery for Colorado acquired 2013.



Figure 2 Seep Spoils Storage Area and Test Pit Locations

Henderson Mill, CO

TP-6 8591 •





Table 1Test Pit SummaryHenderson Mill 1-Dam Seep Spoils Storage Facility

Name	Mine Y (ft)	Mine X (ft)	Lat (Dec.Degree)	Long (Dec. Degree)	Elevation (ft amsl)		Lithology (depths ft)
TP-1	199266.406	1832412.279	39.8785288	-106.1009532	8665	0.0-5.5 5.5-8.0 8.0-8.0	Tt, dry Weathered Xg, dry Xg, refusal
TP-2	198876.339	1832690.891	39.8774631	-106.0999512	8631	0.0-0.5	Xg, refusal, dry
TP-3	199179.296	1832691.549	39.8782948	-106.0999561	8653	0.0-4.0 4.0-4.0	Weathered Xg, dry Xg, refusal
TP-4	199009.187	1833080.926	39.8778349	-106.0985646	8617	0.0-7.0	Tt, dry
TP-5	199232.859	1833244.290	39.8784519	-106.0979879	8596	0.0-6.0 6.0-6.0	Qd, dry Qd, cobbles, refusal
TP-6	199491.694	1833385.180	39.8791650	-106.0974920	8591	0.0-0.75 0.75-8.5	Topsoil, dry Qd, dry
TP-7	199524.261	1833780.509	39.8792616	-106.0960842	8572	0.0-2.0 2.0-13.0	Topsoil, dry Qd, dry
TP-8	199382.978	1833886.310	39.8788756	-106.0957039	8571	0.0-1.0 1.0-12.5	Topsoil, dry Qd, dry
TP-9	199250.237	1833135.529	39.8784976	-106.0983758	8605	0.0-1.5 1.5-7.0	Topsoil, dry Tt, dry
TP-10	199514.846	1833157.262	39.8792244	-106.0983047	8608	0.0-1.0 1.0-8.0	Topsoil, dry Tt, dry
TP-11	198942.098	1832830.570	39.8776462	-106.0994550	8626	0.0-2.5 2.5 -2.5	Weathered Xg, dry Xg, refusal

Tt - Tertiary Troublesome Formation

Xg - Precambrian Biotite Gneiss

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