



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

March 15, 2021

Brian Briggs
Ouray Silver Mines, Inc.
PO Box 564
Ouray, CO 81427

RE: Revenue Mine, Permit No. M-2012-032 , Technical Revision (TR-13), Adequacy Review-1

Dear Mr. Briggs:

The Division of Reclamation, Mining and Safety (Division) is in the process of reviewing the above referenced Technical Revision in order to ensure that it adequately satisfies the requirements of the Colorado Mined Land Reclamation Act (Act) and the associated Mineral Rules and Regulations of the Colorado Mined Land Reclamation Board for Hard Rock, Metal, and Designated Mining Operations (Rules). During review of the material submitted, the Division determined that the following issue(s) of concern need to be adequately addressed before the Technical Revision can be considered for approval. Please provide the following:

Raised Bore

1. Only an aerial map was included with the TR-13 package, it is unclear if this was intended to be the as-built certification or the updated Mine Plan Map. The "Surface Improvements As-Built" map does not meet the minimum requirements of Rule 6.2.1(d) and (e). Specifically no legend, or permit boundary is depicted. *documents are reviewed electronically, scale is dependent on the paper size the map is printed on, revise scale style. Please submit two separate figures:
 - a. The first attachment shall include but is not limited to the signed as-built certifications including dimensions for the buried refuse chamber and CMP Walkway.
 - b. The second attachment shall be an updated mine plan map that meets the requirements of Rule 6.4.3. The map should include but is not limited to the existing Permit Boundary, all mining related structures and features, all stormwater control features and topographic lines
2. Stormwater BMPs are only depicted for run-on water, no down gradient BMPs are illustrated. Please submit an updated stormwater management plan and associated maps or figures to demonstrate how impacts to the prevailing hydrologic balance will be minimized pursuant to Rule 3.1.6 and Rule 6.4.21 (10).
 - a. Specifically, the installation of the refuse chamber and use of HDPE liner creates a



significant possibility for a point source discharge of infiltrated stormwater down gradient of the chamber. Failure to implement down gradient BMP's could result in off-site damage.

3. Describe the "proposed connection" from the Headframe to the Refuge Chamber. Section 4 Construction, vaguely describes it as a 20 foot drift. Please clarify if the drift will be constructed through competent bedrock or historic waste rock and commit to providing as built certifications upon its completion.
 - a. If it is to be constructed through historic waste rock what building materials and or improvements will be required?
 - b. Please address what reclamation measures will be required including any updated tasks or bonding figures related to sealing the drift / connection to underground workings.
4. If, for final reclamation, the Monongahela raise is supposed to be graded to a 2H: 1V and the refuge chamber daylights, how will this be achieved if the connexes will be collapsed and buried in place? What is the estimated total volume of material moved/graded to achieve the final reclamation grade including backfill of the refuge chamber? Please note that any buried materials are required to be a minimum of 3 feet below grade and free from protruding structural elements.
5. In addition to the revised narrative of addressing the changes in the reclamation plan, please submit an updated Reclamation Plan Map in accordance with Rule 6.4.6. Such map shall also meet all applicable requirements of Rule 6.2.1.
6. Based on preliminary comparison of the submitted Appendix 2 in relation to recent satellite imagery available, it is unclear if all disturbances related to the secondary escapeway and refuge chamber are within the 0.23 acre Permit Boundary area. In addition to Item 1b of this review, please demonstrate that all disturbances related to the secondary escapeway including the refuge chamber and CMP walkway are within the Permit Boundary. If there are disturbances outside the Permit Boundary an Amendment to the Permit will be required.

Equipment Storage Warehouse/Main Revenue Site

7. No material storage warehouse was approved under TR-11. TR-11 accounts for the storage connex's to be utilized. Discussion of future replacement was mentioned, however no documentation to support the replacement was submitted or approved. If two storage buildings are desired additional documentation will need to be provided.
8. Section 5.2 references Map F-1a to show the location of the two proposed equipment storage warehouses however, Map F-1a depicts the area to be a Laydown Storage Area. Please provide an updated Mine Plan Map depicting the currently approved and proposed configuration of all facilities. Show the proposed storage buildings on the mine map.
 - a. Will both Equipment Storage buildings be constructed where the connex storage containers were?
9. Provide an updated Reclamation Plan Map pursuant to Rule 6.4.6. Note that if structures are to be removed upon final reclamation they should not be depicted on the Final Reclamation Map.

10. Your narrative states "micro-piles" will be utilized rather than a foundation however the engineered drawings depict the use of cement footers with rebar reinforcement. See drawings 965-FF-01, 965-FF-02 and column layout plan. Provide an engineered certification that micro-piles can be used as the foundation and drawing for how the baseplate will connect to the micro-piles. See section detail E3/E6 and T1.
11. Please state how the "micro-piles" which are proposed to support the Equipment Storage Building(s) will be removed for final reclamation.

Misc. Bonding

12. Updated table L-3 does not include the removal of the Hoist House or CMP Walkway. (And Proposed connection if to be installed)
13. Do the values listed in table L-3 include both structure and foundation demolition of the headframe?
14. What are the revised job task hours for demolition of structures (Hoist, lift house, refuge, walkway) at the Monongahela?
15. Does the cost for the 15) Laydown Storage Areas (Material Storage Buildings) in the updated table L-2 include the cost of removal for both the structure and the foundation (or micro-piles)? Provide details as to how the micro-piles will be demolished.
16. Updated Table L-1 reflects a significantly lower cost for task 2 (importing topsoil). Under TR-11 4,001 CY of topsoil would be bought and delivered for \$176,000 (via Rocky Mountain Aggregate & Construction Inc.) The cost in table L-1 is only \$113,348.33, has this contract been re-negotiated? If not revise the cost of task 2 to \$176,000. Furthermore the cost for placement and grading of that imported topsoil throughout the site has been omitted.
17. TR-11 PAR stated that approximately 8002 CY or 4.96 ac @ 1 ft. thick of caprock would need to be graded. This is in addition to general grading covered under your task 1 (DRMS task 04a). This task is listed in the Division's TR-11 bond calc but is not shown in your Updated L-1, please incorporate.
18. DRMS TR-11 Task 01-b (Disposal of Chemicals) was not included in the Updated L-1 cost
19. Under TR-11 table L-2 1) Diesel storage tanks & Filling station was provided as \$760 for the two tanks disposal and \$500 for the building. Table L-2 cost under TR-13 is only \$500. Please clarify
20. Under TR-11 table L-2 the cost of 13) Tailings thickener tank \$5000 for the tanks and \$23,011.20 for the piping and foundation. TR-13 L-2 only lists the \$5000 for the tank demolition. Please clarify
21. TR-13 table L-2 does not include removal of the portal cover structure. Under TR-11 PAR pg. 25 a user provided cost of \$4,080.
22. TR-13 table L-2 does not include removal of 4-500 gallon water tanks. Under TR-11 this was a cost of \$600.
23. TR-13 table L-2 does not include removal of miscellaneous debris (150 CY building materials and

390 miles of trucking). Under TR-11 this was a cost of \$1,665.00 for disposal and \$2,893.80 for trucking.

Please submit your response(s) to the above listed issue(s) by Monday, March 29, 2021 in order to allow the Division sufficient time for review. If you cannot address the above issues by March 29, 2021 please request an extension to the decision due date to ensure adequate time for the Division to review materials. A decision due date of **April 2, 2021** has been set. If any adequacy issues remain by the decision due date the Division may deny your request.

The Division will continue to review your Technical Revision and will contact you if additional information is needed.

If you require additional information, or have questions or concerns, please feel free to contact me.

Sincerely,



Lucas West
Environmental Protection Specialist

Ec: Travis Marshall, Senior EPS, DRMS
Amy Yeldell, DRMS
Brianna Greer
Todd Jesse