



TRAPPER MINING INC.

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May 7, 2021

Ms. Robin Reilley
Environmental Protection Specialist
Colorado Division of Reclamation, Mining and Safety
1313 Sherman Street, Room 215
Denver, CO 80203

**Re: Trapper Mine (Permit No. C-1981-010) Technical Revision TR-127
2020 Annual Report, Appendix W Responses to CDRMS Comments**

Dear Ms. Reilley:

Please accept this letter as our response to the adequacy review letter dated April 20, 2021. Items requiring a response have been copied below, Trapper's comments follow each as applicable.

20 April DRMS:

DRMS notes that Trapper Inc. incorporated bond release acreages issued in 2021 into the DRMS ARR form. The decisions issued for SL21 and SL22 should be incorporated into the 2021 acres of reclamation released not the 2020 acres of reclamation released.

- 1. Please update the form to reflect only decisions issued in 2020; the SL20 Phase III reclamation released.*

Trapper Response: The Division is correct in their statement that bond release applications SL21 and SL22 were issued final decisions in 2021. However, during the compilation of the Annual Reclamation Report, I have traditionally included bond released acres that received a proposed decision during that calendar year. This same approach was used in 2014 for SL16 and in 2008 for SL8 and SL9. The decision form as provided with the findings document does state the action was "approved" with a date given. The acreages on these forms show the revised acreage for the mine permit, on that decision date. For the purpose of annual changes to the total reclamation acreage values, I assume the change is accounted for at the time of the proposed decision in the state permitting system. The findings document also tracks the proposed decision dates, not the final decision dates for each bond release. If the Division still feels this accounting is in error, Trapper will revise the needed information. Please confirm when the acreage changes within the Divisions permitting system so that the acreages are true at the end of the calendar year.

20 April DRMS:

The report indicates that redisturbance totaling 182.9 acres of phase III reclamation occurred in 2020. While the table indicates that 182.9 acres of phase III reclamation were redisturbed, Section 1.2.6 *Previously Revegetated Acres* indicates 178.7 acres of phase III redisturbance in I and N pit during 2020.

- 2. Please explain the discrepancies pointed out above.*

Trapper Response: The discrepancy noted is a difference in the definition of re-disturbance. Trapper did re-disturb 182.9 acres of reclamation on the mine site during 2020. Of that total 182.9 acres, 178.7 acres were Phase III bond released, the remaining acres were only Phase I and II released. The difference in acreage stems from the drainage corridors present in the old A-Pit area in the East Pyeatt drainage. These drainages were granted Phase I and II bond release during SL releases 5 and 6. During the SL-7 bond release approval, a corridor in these parcels was removed from the proposed Phase III release acres due to storm water runoff from active mining areas still flowing through these drainages. The drainage corridors remained as Phase I and II acreage.

20 April DRMS:

DRMS notes a discrepancy between the 2019 year cumulative total for acres B & G and topsoiled on the 2019 form (4909.4) and for 2019 on the 2020 form 4917.60. This discrepancy was discussed during the April 2021 inspection.

3. It would be helpful if you would please provide a brief explanation of the discrepancy for the record.

Trapper Response: An irreconcilable error was found in the 2019 B & G and topsoiled acres. For the 2020 value, the known acreage of reclamation currently present on the site was used in conjunction with current Phase III bond release acreage. From this value the 2019 and/or previous year value was calculated based on the change in acreage created in 2020. Using this same approach by calculating actual on the ground reclamation acreage for 2019 also reveals the 2019 acreage is incorrect. The cause of the discrepancy could not be found. Complications with accounting for re-disturbance and integrating life of mine Phase III acreages into the new ARR form format may be the cause. Some re-disturbance also existed in multiple states of bond release, as detailed above, due to corridors removed from the Phase III bond releases at the time of release. There was some confusion on total acreages for these parcels due to these corridors and the resultant re-disturbance. The current values as presented in the ARR represent the most accurate accounting of reclamation acreage for the site.

Please contact me if you have any questions regarding the enclosed information.

Sincerely,



Graham Roberts
Environmental Engineer

GCR [M/Permit Revisions/TR-127 Response1 CL.doc]

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Revisions File