



Department of Natural Resources

1313 Sherman Street, Room 215 Denver, CO 80203

August 2, 2021

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

RE: Revenue Mine, Permit No. M-2012-032, Technical Revision (TR-16), 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). Based on the proposed changes included in TR-16 a Reclamation Cost Estimate update will be performed.

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:

Equipment Storage Sheds

- 1. Provide the estimated volume of material generated from dismantling the buildings?
- 2. Is adequate room available to place the additional material underground? Provide a balance sheet of the volume of underground space utilized for on site disposal and the estimated space each building that is slated to go underground will take up. Please note that the area designated for onsite disposal in the underground working must be dry and away from the influence of water.
- 3. Please designate which portal will the sheds be placed in?
- 4. What are the total anticipated job hours associated with dismantling each shed prior to moving it underground?
- 5. Please describe the reclamation measures required for the concrete footers used to support the steele buildings.
- 6. Describe how the footprint of the Equipment Storage Sheds will be reclaimed. (i.e. ripped, topsoil, revegetation)

Security Building

7. Describe how the footprint for this building will be reclaimed. (i.e. ripped, topsoil, revegetation)

Temporary Office Buildings

8. Describe how the footprint for these buildings be reclaimed. (i.e. ripped, topsoil, revegetation)

Equipment Wash Area

- 9. The Equipment Wash Area is not located on the map F-1, please revise the map to include this feature.
- 10. It is understood that the as-built drawings will be submitted upon completion of the wash area. Please provide drawings and designs showing the size, location and construction details of the wash pad.
- 11. What is the sump capacity of the Equipment Wash Area?
- 12. Please provide details of the oil/water separator that is being proposed for use in the Equipment Wash Area. Details should include technical specifications and efficiency information to demonstrate that wash water will be free of hydrocarbons prior to introduction to the passive water treatment system.
- 13. During the reclamation of the Equipment Wash Area please specify where the concrete rubble from removing the wash pad will be placed?

Generator Station and Fuel Tank

14. It is noted that the two Generator Stations will be left on their respective trailers while in use, however no secondary containment structure for the units were described. Please describe what sort of containment structures will be used for the two generator units while on site.

<u>SPCC</u>

- 15. Table 3.1, no secondary contaminant description is listed for Container C-5. Similarly the generators included under C-9 will have a similar containment structure.
- 16. Table 4.3 of the SPCC plan does not include the new 10,000 gal fuel tank or storage of fuel within the generators. It is container C-9 in the SPCC, please update this section of the SPCC.
- 17. Section 4.2.11 should also address the two proposed backup generators (C-9)
- 18. Section 4.3 is an incomplete list of tanks that have hydrocarbons transferred into it. It should include C-5 and C-9. Note that C-8 is listed but not labeled, transfer of reagents. Please update this section of the SPCC for consistency.

Please submit your responses to the above listed issues by Monday <u>August 16,021</u> in order to allow the Division sufficient time for review. If you cannot address the above issues by August 16, 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 **August 30, 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.

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Sincerely,

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Lucas West Environmental Protection Specialist Division of Reclamation, Mining and Safety

Ec: Travis Marshall, Senior EPS, DRMS Amy Yeldell, DRMS Todd Jesse, OSMI Michelle Robbins, OSMI