



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

August 16, 2021

Dustin Ballard
Advantage Mining & Reclamation LLC
P.O. Box 1211
Fairplay, CO 80440

RE: Adequacy Review, Request for Technical Revision TR1, London Mill Cobble, File No. M-2020-054

Dear Mr. Ballard,

On July 28, 2021, the Division received Advantage Mining & Reclamation LLC's (Operator) request for a Technical Revision (TR1) for the London Mill Cobble, Permit No. M-2020-054, regarding the addition of an air burner to the site operations. The Division has determined that the following items need to be adequately addressed before TR1 can be considered for approval. Please respond to this Adequacy Review with the requested information and summarize each response to the numbered items below, in a cover letter titled "Adequacy Review Responses TR1, M-2020-054".

1. The Operator states an air permit has been applied for the air burner. Please commit to providing the Division with a copy of the approved air permit.
2. The Operator states a maximum of 100 tons of slash/trees and 100 tons of ash would be kept onsite at any one time. Please provide the approximate volume (cubic yards) of these two materials in order for the Division to calculate a removal/disposal task within the reclamation cost estimate.
3. In accordance with Rule 3.1.5, 6.3.4(j), and 6.3.4(l), please provide details on how the Operator will mitigate wind and water erosion on the ash stockpile to prevent impacts to the hydrologic balance and to protect off-site lands from damage.
4. Please discuss if and how fuel will be stored on-site for the air burner.

This concludes the Division's adequacy review of TR1. This letter shall not be interpreted to mean that there are no other technical inadequacies in your revision as other issues may arise when additional information is supplied. Please be advised the London Mill Cobble Technical Revision TR1 may be deemed inadequate, and the request may be denied on **August 30, 2021**, unless the above mentioned adequacy review item is addressed to the satisfaction of the Division. If more time is needed to respond, the Division can grant an extension of the decision date following a request to do so by the Operator.

If you have any questions or need further information, please contact me at (303) 866-3567 x8132.

Sincerely,

Elliott R. Russell
Environmental Protection Specialist

Ec: Jason Musick with DRMS, jason.musick@state.co.us
Ben Langenfeld with Greg Lewicki and Associates, benl@lewicki.biz

