

September 1, 2021

Dan Hartman Director of Public Works 911 Tenth St. Golden, CO 80401

Re: City of Golden; Empire Pit; File No. M-1977-534; Technical Revision No. 4 (TR-04); Adequacy Review

Mr. Hartman,

The Division of Reclamation, Mining and Safety (Division/DRMS) reviewed the contents of technical revision no. 4 (TR-04) for the Empire Pit received on August 16, 2021 and submits the following comments. The Division is required to make an approval or denial decision no later than September 15, 2021 therefore; a response to the following adequacy review concerns should be submitted to the Division as soon as possible.

- The Operator proposes to re-establish an access road along the east fence line of the
 pasture at the request of the property owners. The Division believes based on the map
 submitted with the technical revision the Operator intends to re-establish an access road
 along the west fence line of the permit boundary. Please review the statement and revise
 the technical revision accordingly.
- 2. Please provide typical construction details for the proposed access roads and turn around area.
- 3. The Operator states, where needed, the liner will be anchored under the road in such a way to prevent migration. Please explain and provide details regarding how the geosynthetic clay liner will be anchored under the new access road adjacent to the saline soil revegetation area.
- 4. The Operator states drainage will be redirected from the site that is currently causing minor erosion on the road that connects the reclamation area to the property to the north. Please describe the drainage improvements and indicate the location of improvements on the revised Reclamation Plan Map.



- 5. The Operator states the construction of a new road to access the property to the south is included in the technical revision. The Operator did not provide a description or depict the new access road on the revised Reclamation Plan Map. Please provide a description and revise the Reclamation Plan Map to indicate the location of the new access road.
- 6. Note #3 on the revised Reclamation Plan Map states, refer to specifications for the permanent seeding requirements. Please confirm the Operator is not proposing to revise the approved reclamation seed mixture for the site.

Please be advised the technical revision for the Empire Pit may be deemed inadequate and the revision may be denied on September 15, 2021, unless the above mentioned adequacy review items are addressed to the satisfaction of the Division.

If you have any questions, please contact me at peter.hays@state.co.us or (303) 866-3567 Ext. 8124.

Sincerely

Peter S. Hays

Environmental Protection Specialist

Ec: Jared Ebert; Division of Reclamation, Mining & Safety