

November 12, 2021

Lance Barker  
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Mineral Mountain Gold, LLC  
P.O. Box 247  
Cripple Creek, CO 80813

**Re: Adequacy Review #3, Amendment AM1, Mineral Mountain Project, Permit M-2014-045**

Mr. Barker:

On October 27, 2021, the Division of Reclamation, Mining and Safety (Division) received the response to the Division's October 22, 2021 Adequacy Review letter for the Mineral Mountain Project, LLC (Operator) 110d Reclamation Permit Amendment Application (AM1) on the Mineral Mountain Project, Permit No. M-2014-045. During the review of the material submitted, the Division determined that the following items need to be adequately addressed before AM1 can be considered for approval. Please title your responses "Adequacy Review Response #3 AM1 M-2014-045".

**EXHIBIT C – Mining Plan (Rule 6.3.3)**

6. Please describe how the Operator will prepare the floor and key-in the proposed 0.5 foot high concrete berm at the entrance to the sump room to ensure that all fluids captured by the berm are contained directed to the sump room.
15. The Division has updated the 2014 reclamation cost estimate with up-to date unit costs and additional reclamation tasks associated with AM1. The Division has calculated the total required financial warranty for the site to be \$36,640.00, which is an increase of \$8,290 from the \$28,350 financial warranty currently held for the site. A copy of the reclamation cost summary is attached for the Operator's review. At this time, upon approval of the AM1, the required financial warranty for the proposed operation will be set at \$36,640.00 and the additional amount will be due within 60 days of approval; please contact me prior to the decision date to discuss any questions regarding the cost estimate or if you identify any errors with this calculation.

**EXHIBIT U – Designated Mining Operation Environmental Protection Plan (Rule 6.4.21)**

38. The Operator has stated that a Quality Assurance and Quality Control (QA/QC) program will be implemented and since "DRMS regulations require approval by DRMS, Elliot Russell of DRMS, or his designee shall inspect the installation to meet the acceptance criteria by DRMS". In accordance with Rule 7.3.1(4), it is the responsibility of the Operator to provide adequate QA/QC or certification of the construction of the EPF. The QA/QC program is to be completed by a 3<sup>rd</sup> party engineer or designee. Please revise the *Engineering design for Concrete floor in Mill Room and Chemical Storage Room* to include the QA/QC program. Please note, the Division may still inspect the installation of the secondary containment, however QA/QC is to be performed by the 3<sup>rd</sup> party engineer or designee. In accordance with Rule 7.3.2(2), the Operator must provide a certified verification by a professional engineer or other appropriately qualified professional that will confirm that the facility was constructed in accordance with the approved design plan. This final facility certification report will be reviewed and accepted by the Division.



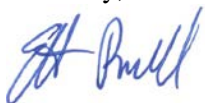
**New Adequacy Review Items:**

42. To accompany the *Diagram of Processing Area*, please provide cross section designs with a North-South and East-West trending depiction to show the concrete floor, sills/berms and rib coverings of the upper and lower levels of the mill including the sump room berm. Upon review of the *Diagram of Processing Area*, the Division has discovered the Operator has relocated the proposed Designated Chemical Storage Room from the western upper mill room to a separate room located east of the grinding area. The designs, exhibits, and adequacy review response narratives do not depict or describe containment of this new proposed room. Please confirm this room will be similarly constructed as the mill room(s). Please also provide cross sectional diagrams of this room too.
43. Please revise the *Engineering design for Concrete floor in Mill Room and Chemical Storage Room* to include a mixing and material specifications for the concrete containment structure.
44. Within the *Engineering design for Concrete floor in Mill Room and Chemical Storage Room*, the installation instruction step #5 describes existing concrete foundations within the mill room which will be thoroughly cleaned so that good adhesion occurs between the existing foundations and the floor. Please address the following items:
  - a. Please describe and account for all existing foundations.
  - b. Please depict these existing foundations on the cross section diagrams requested above.
  - c. In addition to thoroughly cleaning, the Operator will need to propose further measures to ensure a water tight seal occurs between the existing foundations and the new floor (water stops or other seals, use of a bonding agents, etc.).
45. There appears to be a typo/miscalculation regarding the volume of concrete needed for the Designated Chemical Storage Room. Please revise this volume calculation within the *Engineering design for Concrete floor in Mill Room and Chemical Storage Room*.
46. Any changes or additions to the application on file with the Division, must also be reflected in the public review copy. Please submit proof that the public review copy has been updated or a copy of the response to this adequacy letter has been added to it.

This concludes the Division's third adequacy review of AM1. Subsequent to receipt and review of the Operator's response to these items, the Division may identify additional items. As a reminder, please be advised that AM1 may be deemed inadequate, and the application may be denied on the decision date deadline, unless the above mentioned adequacy review items are addressed to the satisfaction of the Division. **If more time is needed to complete the reply, the Division can grant an extension to the decision date.**

If you have any questions, please contact me by telephone at 303-866-3567 x8132, or by email at [elliott.russell@state.co.us](mailto:elliott.russell@state.co.us).

Sincerely,



Elliott R. Russell  
Environmental Protection Specialist

Ec: Jason Musick and Leigh Simmons, DRMS  
Art Braun, Braun Environmental, Inc., [braunenv@msn.com](mailto:braunenv@msn.com)