



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

June 22, 2022

Amy Veek
GCC Rio Grande, Inc.
3372 Lime Road
Pueblo, CO 81004

**Re: Salt Canyon Project, Permit No. M-1997-064, Technical Revision (TR-3);
Preliminary Adequacy Review**

Dear Ms. Veek:

The Division of Reclamation, Mining and Safety (DRMS) received a request for a Technical Revision (TR-3) addressing the following:

Updated Mining Plan and Disturbed Acreage Increase.

The submittal was called complete for the purpose of filing on May 31, 2022. The **decision date for TR-3 is June 30, 2022**. Please be advised that if you are unable to satisfactorily address any concerns identified in this review before the decision date, **it will be your responsibility to request an extension of the review period**. If there are outstanding issues that have not been adequately addressed prior to the end of the review period, and no extension has been requested, the Division may deny this Technical Revision.

The following comments are based on the DRMS review of the request for TR-3 and the information requested as part of the Corrective Action for the problem cited in the DRMS site inspection report dated March 15, 2022:

- 1) Rule Reference: The last sentence of the first paragraph of your cover letter references “Section 1.9 of the Mineral Rules and Regulations of the Colorado Mined Land Reclamation Board for Hard Rock, Metal, and Designated Mining Operations”. The primary commodity mined at the Salt Canyon Project is gypsum, a construction material. As such, this permit is regulated under the “Mineral Rules and Regulations of the Colorado Mined Land Reclamation Board for the Extraction of Construction Materials”. Rule 1.9 is the same in both sets of the regulations, but that is not the case for all Rules. No response is necessary.
- 2) General Mining Information: The cover letter states the maximum allowed disturbed area at one time will be increased to 40 acres. The third paragraph on p.1 of Exhibit D states “Processing and Storage Area will be limited to approximately ten (10) acres or less.” Please clarify whether the 10-acre processing and storage area is included in the 40-acre maximum allowed disturbance.



- 3) Active Mine Highwall: The first paragraph on p. 2 of Exhibit D indicates a 225 foot wide limit to the active face will be maintained, and discusses dozers pushing blasted material down to the pit floor “if needed”. The sloping of highwalls to 3H:1V is an important consideration in estimating the reclamation bond, in both the length of the highwall and the initial mining/excavated slope. Please provide clarification on the typical highwall configuration:
 - a. 225 feet would seem to be a short highwall length. A quick look at the October 6, 2019 Google Earth image indicates the active highwall was approximately 650 feet long. Please clarify if the mine plan has changed since 2019 to maintain a shorter highwall width, or if the indicated 225-foot width needs to be increased.
 - b. Is the highwall planned to be near vertical, or blasted at 3H:1V?
- 4) Highwall 115 Visual Buffer: The third paragraph on p. 2 of Exhibit D discusses the “most southeasterly portion of the southern deposit will not be mined to maintain visual buffering for Highway 115 patrons. When mining approaches this area, a 3:1 slope will be maintained...”. It is unclear from this narrative whether the reclamation plan for this area has changed from what is shown on the Exhibit F map (dated 9/3/2009) and approved with the 2009 conversion application; or if this is the proposed Phase 7, 8 or elsewhere. Please clarify where this area exists and where the visual buffering is planned on Exhibit C maps C-2 and C-3. Also, if this grading differs from the approved Exhibit F map, please submit a revised Exhibit F.
- 5) Surface Water Management Reclamation: The last paragraph of Exhibit D discusses the “installation of temporary diversion ditches, berms, and settling basins”. Please address the disposition of these features during final reclamation, when they will be removed and provide estimated or typical dimensions of each feature to be included in the reclamation cost estimate.
- 6) Blasting Plan: There are two elements of the blasting plan that could not be located:
 - a. Limits on airblast (dB or psi),
 - b. Locations of blast monitoring.

Please provide this information.

If you have any questions or need further information, please contact me at (303)866-3567 x8169.

Sincerely,



Timothy A. Cazier, P.E.
Environmental Protection Specialist

ec: Michael Cunningham, DRMS
DRMS file