



TRAPPER MINING INC.

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June 23, 2022

Ms. Robin Reilley
Environmental Protection Specialist
Colorado Division of Reclamation, Mining and Safety
1313 Sherman Street, Room 215
Denver, CO 80203

**Re: Trapper Mine (Permit No. C-1981-010) Technical Revision TR-129
2021 Annual Report, Appendix W Responses to CDRMS Comments**

Dear Ms. Reilley:

Please accept this letter as our response to the adequacy review letter dated April 20, 2021. Items requiring a response have been copied below, Trapper's comments follow each as applicable.

DRMS 1 April 2022

Acres disturbed should not be greater than the sum of:

- Acreage in active mining
- Backfill and grading
- Long term facilities acres.

1. The 2021 ARR indicates a 4.1 acre increase in acres disturbed, when summing the above components. It is not clear to DRMS where this increase in acreage derives. Please, provide some explanation for the acreage difference.

Trapper Response: As was noted in last year's Annual Reclamation Report an irreconcilable error was found in the 2019 "Acres Backfilled and Graded, Acres Topsoiled and Acres Seeded" acres. For the 2020 value, the known acreage of reclamation currently present on the site was used in conjunction with current Phase III bond release acreage. From this value the 2019 and/or previous year value was calculated based on the change in acreage created in 2020. This resulted in 8.2 acres being added to the 2019 "Acres Backfilled and Graded, Acres Topsoiled and Acres Seeded" sums. In error, the same adjustment was not made to the "Acres Disturbed" category which is inclusive of these acres.

Furthermore, after careful review of these numbers, the new disturbance acreage as reported in 2020 at 271.5 acres was incorrect. This acreage should have been 266.6 after a review of the 2020 ARR map.

After correcting the error in disturbance for 2020 and the adjustment necessary to the "Acres Disturbed" tally the sum of Active Mining, Backfilled and Graded and Long term facilities now equals the "Acres Disturbed" acreage. These slight adjustments were then carried forward to the 2021 ARR acreage tallies and they are also now correct. The sum of the above values equals the

“Acres Disturbed” value as it should for 2021. These corrections should remedy the discrepancies that were found in the disturbance numbers over the last three years.

Revised materials for the 2021 Annual Reclamation Report are included and should replace previously submitted materials.

Please contact me if you have any questions regarding the enclosed information.

Sincerely,

A handwritten signature in dark ink, appearing to read "Graham Roberts", written in a cursive style.

Graham Roberts
Environmental Engineer

GCR [M/Permit Revisions/TR-129 Response1 CL.doc]

c File 109.2.3.4 w/o attachments
Revisions File