



# TRAPPER MINING INC.

P.O. Box 187

Craig, Colorado 81626

(970) 824-4401

October 26, 2022

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

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*Re: Trapper Mining Inc., Permit No. C-1981-010*

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## Technical Revision, TR-132, Response to Adequacy Review No. 1

Dear Ms. Reilley:

Below is our response to your Adequacy Review letter of October 18, 2022 to Trapper's Technical Revision TR-132 application. We have used your original letter as the base format, with our response following each of your comments.

### **DRMS 18 October 2022**

#### **Rule 2.04.4 Cultural and Historic Information**

DRMS is in receipt (17 October), of a letter from History Colorado requesting an additional cultural survey to cover lands identified previously (2020), to have a high potential for the area to contain previously unidentified cultural remains that could be impacted by the proposed TR132 application.

*1. Please address History Colorado's concerns and provide DRMS with the information as to the relationship of the current TR132 request with the PR10 permitting action comprising the 2020 Metcalf Survey.*

**Trapper Response to Comment 1:** The two areas proposed for stripping operations under TR-132 have been placed on two separate maps. One map demonstrates the areas of Trapper Mine that have been surveyed for archeological resources. The second map demonstrates the historic pit areas and associated disturbance on the site. The smaller of the two areas is approximately 4.5 acres and is situated in previously undisturbed lands. This area was surveyed by Metcalf and Associates under report "*Trapper Mining, Inc.: Intensive Cultural Resources Inventory of Proposed 2022-2024 Disturbance Areas Within the Colorado State Coal Lease Boundary, Moffat County, Colorado; Metcalf Project No. 2020.CO.091*" during the

summer of 2020. The second larger area, approximately 29 acres is situated in previously disturbed lands as part of the H-Pit mining in the early 90's. This area was previously mined and used as dragline walk road before being fully reclaimed in 2004. The area has subsequently been fully bond released. Per discussions with History Colorado in 2020, only areas not previously disturbed were surveyed for archeological resources.

**Rule 2.05.6(4) Mitigation of Impacts, Public Parks and Historic Places**

*2. Please address the concerns related to the 17 October 2022 letter from History Colorado as it relates to listed archeological sites and provide information as to Trapper Mine Inc's, plan to protect any sites listed or eligible for listing as determined by SHPO.*

**Trapper Response to Comment 2:** Impacts to and protection of archeological sites is addressed in permit section 4.1; Control of Impacts to Cultural and Historical Sites and Structures. If any sites are encountered they will be addressed for protection or mitigation before proceeding with continued operations.

The attached letter, maps of proposed disturbance and a copy of Trappers PAP section 4.1 have been submitted directly to History Colorado for their consideration on this matter.

Please get back to us with any questions, comments or concerns.

Sincerely,



Graham Roberts  
Environmental Supervisor  
Trapper Mining Inc.

c TR-132 revision binder  
File 109.2.3.4