



TRAPPER MINING INC.

P.O. Box 187

Craig, Colorado 81626

(970) 824-4401

October 26, 2022

Mr. Matthew Marques
Section 106 Compliance Manager
History Colorado
1200 Broadway
Denver, CO 80203

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

Technical Revision, TR-132, Response to History Colorado Survey Comments

Dear Mr. Marques:

In regards to correspondence dated October 14, 2022 concerning your initial review of Technical Revision 132 for the Trapper Mine in Craig Colorado, the following comments should address any concerns raised in your review.

The Technical Revision 132 proposes stripping two areas of the mine site. These areas have been placed on two separate maps (attached), shown in green. Map M45 demonstrates the areas of Trapper Mine that have been surveyed for archeological resources. The second map, M4, 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 and submitted to your office in October 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 a dragline walk road before being fully reclaimed in 2004. The area has subsequently been fully bond released. The re-disturbance of this area will not exceed the previously disturbed area. Per discussions with History Colorado in the summer of 2020, only areas not previously disturbed were surveyed for archeological resources.

The Trapper Mine mining permit, Section 4.1; Control of Impacts to Cultural and Historical Sites and Structures addresses the requirements of protections of any sites known or found during the

mining process. As found in this section and attached for your reference, operations will be halted if any sites are found and evaluated before proceeding. Protection or mitigation of the site will be devised and conducted if necessary for continued mining operations.

The surveys conducted in 2020 should be adequate to cover this mining revision and other future operations at the site for the foreseeable future.

It is of utmost importance that we address your concerns in a timely manner as we must conduct this work in the coming weeks before winter weather precludes topsoil stripping on the site. Please contact me with any questions, comments or concerns (970-826-6143).

Sincerely,

A handwritten signature in cursive script, appearing to read "Graham Roberts", with a long horizontal flourish extending to the right.

Graham Roberts
Environmental Supervisor
Trapper Mining Inc.

c TR-132 revision binder
File 109.2.3.4

4.1 CONTROL OF IMPACTS TO CULTURAL AND HISTORICAL SITES AND STRUCTURES

Revised
9/24/81

All lands within and adjacent to the proposed mine plan area have been surveyed for cultural and historical resources. These resources are discussed in detail in Section 2.9 and Appendix K and are shown on Map M45.

Under Title I of the Historic Preservation Act (1966), the Secretary of Interior is authorized to expand and maintain a National Register of districts, sites, buildings, structures and objects significant in American history, architecture, archaeology, and culture. The Colorado State Historical Society has been contacted to determine the current National Register listings in Moffat County. This list includes:

- 1) White-Indian Contact Site at Brown's Park, listed 3/8/77.
- 2) Old Lodore School at Brown's Park, listed 2/24/75.
- 3) David H. Moffat "Marcia" Pullman car at Craig, listed 6/20/75.
- 4) Two-Bar Ranch at Maybell, listed 2/17/78.

None of the listed sites are in or adjacent to the proposed mine plan area and no new nominations are known to be pending for Moffat County. However, two archaeological sites (5MF290/549 and 5MF948) evaluated during a 1980 cultural resources survey for Trapper Mine have been recommended for testing of eligibility for the National Register. (Refer to Section 2.9 and Appendix K for more detail.)

In the future, any unidentified cultural or historical resources discovered on lands within or adjacent to the proposed permit area will be reported as is appropriate to the responsible regulatory agencies. If necessary, activities that may damage or destroy such a find will be halted until the area can be evaluated by a qualified historian or archaeologist. Appropriate mitigative measures will subsequently be initiated. Resumption of activity will not begin until the evaluation is complete and the necessary information is collected or protective measures are implemented.

4.1.1 Archeological Resources

Of the two archeological sites (5MF288 and 5MF290, refer to Section 2.9 and Appendix K) as surveyed and catalogued by Breternitz (1972), only one (5MF288) will be disturbed by mining activities. This site has, in fact, been destroyed already by the construction of sediment control dams in Johnson drainage. The Craig District Bureau of Land Management has approved the survey of these sites (refer to Appendix K) and no further mitigation was necessary prior to disturbance.

The survey conducted for Trapper Mine during the summer of 1980 by Archeological Services, Laramie, Wyoming, identified five sites on or adjacent to the proposed mine plan area. (Refer to Section 2.9 and Appendix K.) Only three of these sites (sites 5MF945, 5MF946 and 5MF947) will be disturbed by mining activities. None of these sites were considered worthy of testing for nomination to the National Register and Archeological Services (1980) stated that no further work was needed for them. Both sites 5MF946 and 5MF947 were disturbed in the spring of 1981 with topsoil salvage advance in Ashmore Pit. Site 5MF945 was disturbed by mining activities during the 1993-1997 permit period. This site was inventoried and recorded and no further work was proposed. (Refer to part IX of Appendix K for more detail).

An archeological site previously identified by Breternitz in 1972 as site 5MF290 and resurveyed in 1980 by Archeological Services as site 5MF949, was recommended by Archeological Services for nomination to the National Register. (Refer to Section 2.9 and Appendix K for more detail.) This site is outside the proposed mine plan area but inside the proposed permit area. However the site was not considered eligible to the National Register of Historic Places on August 27, 1982 by the State Historic Preservation Officer (Appendix K, Part I).

Revision: TR-115

Approved: 8-6-16

Site 5MF948 is a pictograph on the outcrop of the Twenty Mile Sandstone on the south side of the Williams Fork Mountains. This site is outside the proposed mine plan area but within the permit area. The site was determined eligible to the National Register of Historic Places by the State Historic Preservation Officer on August 27, 1982 (Appendix K, Part I).

The site lies approximately 700 feet south of the closest proposed mining disturbance. Due to this distance from the mining area, the location of the site on the Twenty Mile Sandstone and the relatively inaccessible location, the site will not be disturbed by Trapper Mine Operations.

No other archeological sites have been recorded within or adjacent (500' or closer) to the proposed mine plan area.

4.1.2 Historical Resources

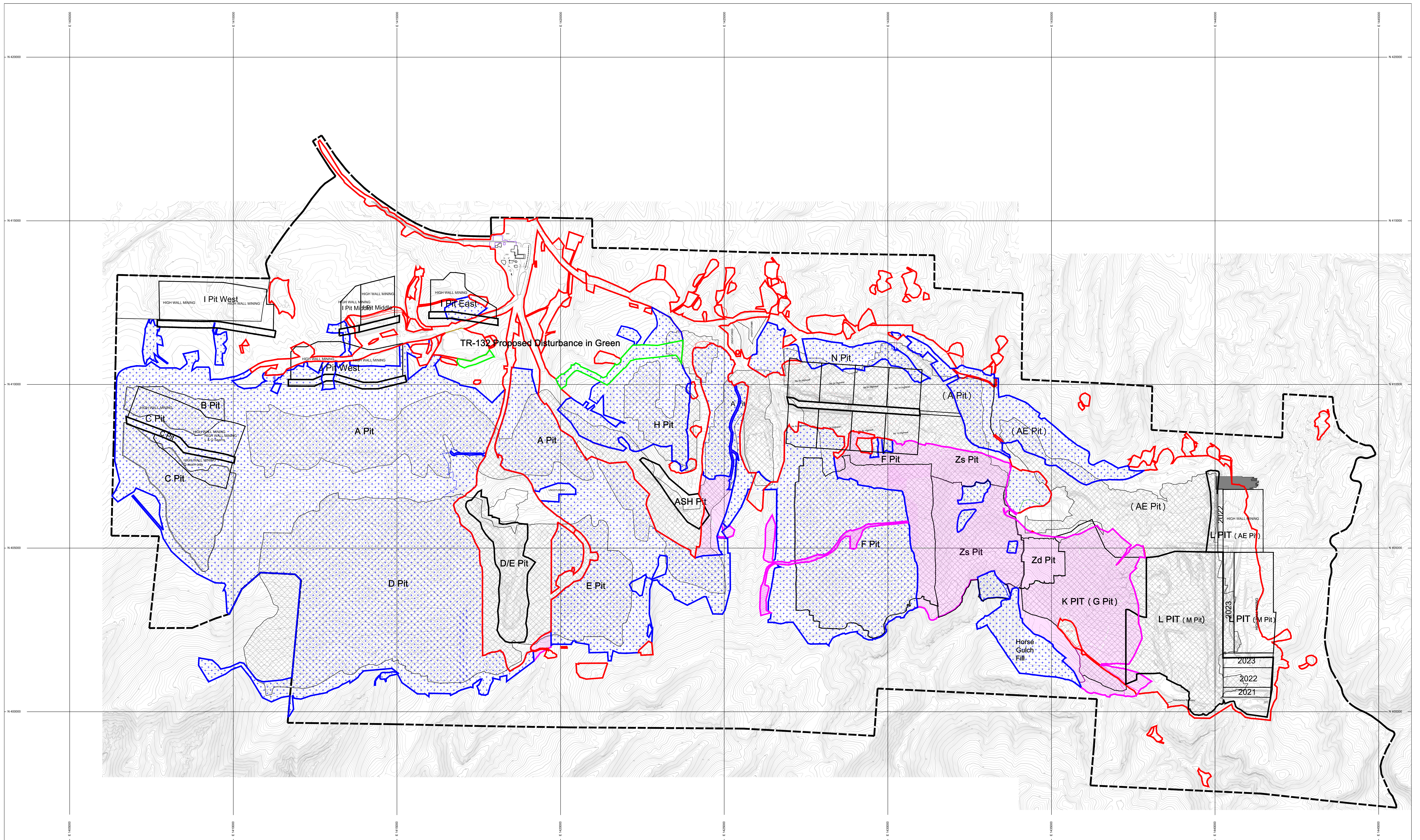
No significant historical resources have been identified within or adjacent to the proposed mine plan area. Of the three sites located prior to this permit submittal, two (sites 5MF348 and 5MF950) will be disturbed by the proposed mining activities during some future permit period.

Historical site 5MF348 has been evaluated by the Bureau of Land Management as the surface managing agency. They have determined this site does not qualify for the National Register (Refer to part II of Appendix K). The site has been fully inventoried and recorded and no further work is proposed before disturbance.







Historical site 5MF950, located by Archeological Services in 1980, was surveyed by Nickens and Associates in May, 1987. As explained in Section 2.9.2, the site does not qualify for the National Register and no further work is required. The site will be disturbed by mining activities late in the life of the mine.

During the 1987-1992 permit term, three additional historical sites, 5MF1960, 5MF2253, and 5MF2427 were discovered. These sites will be disturbed by mining operations. However, they have been cleared by the State Historical Preservation Officer as not eligible for the National Register and no further work is required (Part X, XI, and XII of Appendix K).

None of the sites (archaeological or historical) referred to in attachment B of the OSM mining plan approval document No. CO-0013 will be impacted during the current permit term.



LEGEND

- | | |
|---|---|
|  | PERMIT BOUNDARY |
|  | CURRENT PIT BOUNDARIES |
|  | HISTORIC PIT BOUNDARIES |
|  | NON - PHASE III BOND - RELEASED RECLAMATION |
|  | CURRENT ASSOCIATED AREAS OF DISTURBANCE |
|  | PHASE III BOND RELEASE AREAS |



SCALE: 1 IN = 1000 FT
CONTOUR INTERVAL: 10 FEET

Topographic information compiled from 2017 aerial photography and December 2021 Topography from Drone surveys.

L:\Engineer /PR11/PR11/M4A Pit Boundaries & Dist. Areas/M4A_PR11.dwg

[illegible]

TRAPPER MINING INC.
TRAPPER MINE CRAIG, CO

Pit Boundaries and Areas of Associated Disturbance

SCALE:	1" = 100'
DESIGNED BY:	WTC
DRAWN BY:	WTC
DATE:	3/28/2022

Sheet 1 of 1

M4-A



