TRAPPER MINING INC.

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March 14, 2023

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

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

Permit Revision PR-11, Response to Adequacy Review No. 2

Dear Ms. Reilley:

Enclosed is our response to your Adequacy Review #2 letter of February 28, 2023 to Trapper's Permit Revision PR-11 application. We have used your original letter as the base format, with our responses following each of your comments where a response was requested. Comments and responses that were deemed adequate from the first response have been removed from this correspondence.

The following revised permit narrative page is enclosed: 2-392. The following revised permit tables are enclosed: Table 2.7-9 (p. 2-398) and Table 2.7-10 (p. 2-399). The following revised map is enclosed: M31. The following new maps are enclosed: Table M54I, Table M54J and Table M54K.

Rule 2.04.4 Cultural and Historic Information
DRMS December 2022
DRMS is in receipt (7 November 2022), of a letter from History Colorado requesting an additional cultural survey to cover lands previously identified (2020), to have a high potential for having previously unidentified cultural remains that could be impacted by the proposed PR11 application.
3. Please address History Colorado's concerns and provide DRMS with any outcomes pertinent to the PR11 expansion area.

Trapper Response to Comment 3: Trapper submitted a letter with attached maps to SHPO in response to their comments on January 17, 2023. SHPO's response is pending.

DRMS understands that Section 4.1 of the Trapper permit addresses reporting unidentified resources as discovered, halting activities and taking mitigative measures until evaluation by an the appropriate professional.

DRMS notes the receipt on 3 February 2023, of SHPO's response to Trappers January 2023 letter. SHPO's letter recommends additional class III archeologic inventory mapping in I and L

Pits prior to construction. ***Please continue to work with History Colorado clarify their expectations.***

Trapper Response to Above Comments: Additional follow-up was conducted with SHPO concerning correspondence sent February 16th, 2023. In this correspondence Trapper supplied SHPO with the Environmental Analysis completed by OSMRE in April of 2016 in response to a mine plan modification for Federal Coal Leases C-07519 and C-079641, within which proposed operations in L-Pit fall. This document analyzed cultural impacts for the coal lease areas and no requirements or comments were made at this time in regard to further archeological studies being required in this project area. OSMRE directly references this document in their January 3rd, 2023 concurrence letter to DRMS regarding the proposed PR-11 and determined it did not require a mine plan modification.

It is Trapper's opinion that this document is federal approval for all future operations in these coal leases and does not require further archeological surveys in the pre-existing permitted mine area at the time the EA was drafted. This includes all lands within the before mentioned Federal Coal leases. This action should satisfy any federal NEPA concerns and impacts SHPO is required to assess for.

DRMS understands that C Pit has been previously mined. DRMS also understands that a 4,500,000 LCY overburden stockpile (pages 3-15b and 3-15c) near C pit will be utilized for overburden storage and a temporary spoil pile of 600,000 LCY will be located east of No Name Pond #2 south of the BC haul road.
22. Given possible instability in these area please speak to the stability of the locations for holding large stockpiles, especially with regards to any previously mined areas that the overburden may be placed on.

23. Approximately how long will the stockpiles occupy their temporary locations?

Trapper Response to Comments 22: Trapper contracted with Agapito Associates, Inc. of Denver, Colorado to evaluate the stability of the temporary overburden stockpile designs mentioned above. Agapito concluded that the designs resulted in stable configurations with the I/J Pits stockpile showing cross section safety factors all exceeding 1.7, while the C Pit cross sections all met or exceeded safety factors of 1.3.

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DRMS notes that Trapper Mine Inc. provided the AGAPITO Geotechnical Report for the N Pit spoil piles for TR124, no such analysis was included in the PR11 submission for the C Pit spoil piles.
Please as per Rule 2.05.3(6)(b) and 2.05.3(6)(c) provide the Agapito analysis indicating the safety factors referenced in the response above.

Trapper Response to Comments 23: The stockpiles will remain in place until near the end of the Trapper mine life, anticipated to be in 2028.

Trappers' response adequately addresses the above cited rule *with the exception* of the provision to DRMS of the Agapito analysis for C Pit which is still outstanding.

Trapper Response to Above Comments: The applicable stability study for the C-Pit area is a Draft document concerning dragline spoil piles on the north highwall of the pit. The temporary spoil pile to be constructed by truck dumps has not been fully designed. A full geotechnical analysis for this pile is still

pending and can be provided to the division at a later time. The analysis of the dragline spoils, which are similar in nature and location to the truck dump pile has been included as an attachment to this letter. The document is not intended to be added to the PAP at this time, as these are temporary spoil stockpiles.

DRMS December 2022

25. Please address the concerns related to the 7 November 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 25: See comment number 3. Mitigation of archeological sites will be handled per section 4.1.1 of the permit. Concerning sites located in I West-Pit if they are to be disturbed, a mitigation plan has been developed with Metcalf Archeological Consultants and will be implemented if needed.

DRMS notes the receipt on 3 February 2023, of SHPO's response to Trappers January 2023 letter. SHPO's letter requests addition archeologic inventory mapping in I and L Pits prior to construction.

This adequacy item remains outstanding until further communication with SHPO.

Trapper Response to Above Comments: See prior response concerning correspondence with SHPO.

The following questions derive from DRMS's groundwater hydrology review and continue the numbering from the original adequacy letter and are organized by rule below.

Rule 2.04.6(2)(b) Geology Description; Surface Mining

DRMS 28 February 2023

39. Map 36 shows the locations of core holes used to characterize overburden geochemistry, and Section 2.7.2 (Page 2-357) presents the results of the analysis. No revisions to Section 2.7.2 have been proposed with PR-11, and Map 36 shows that few core holes were drilled in the western part of the permit area (see Figure 1 below).

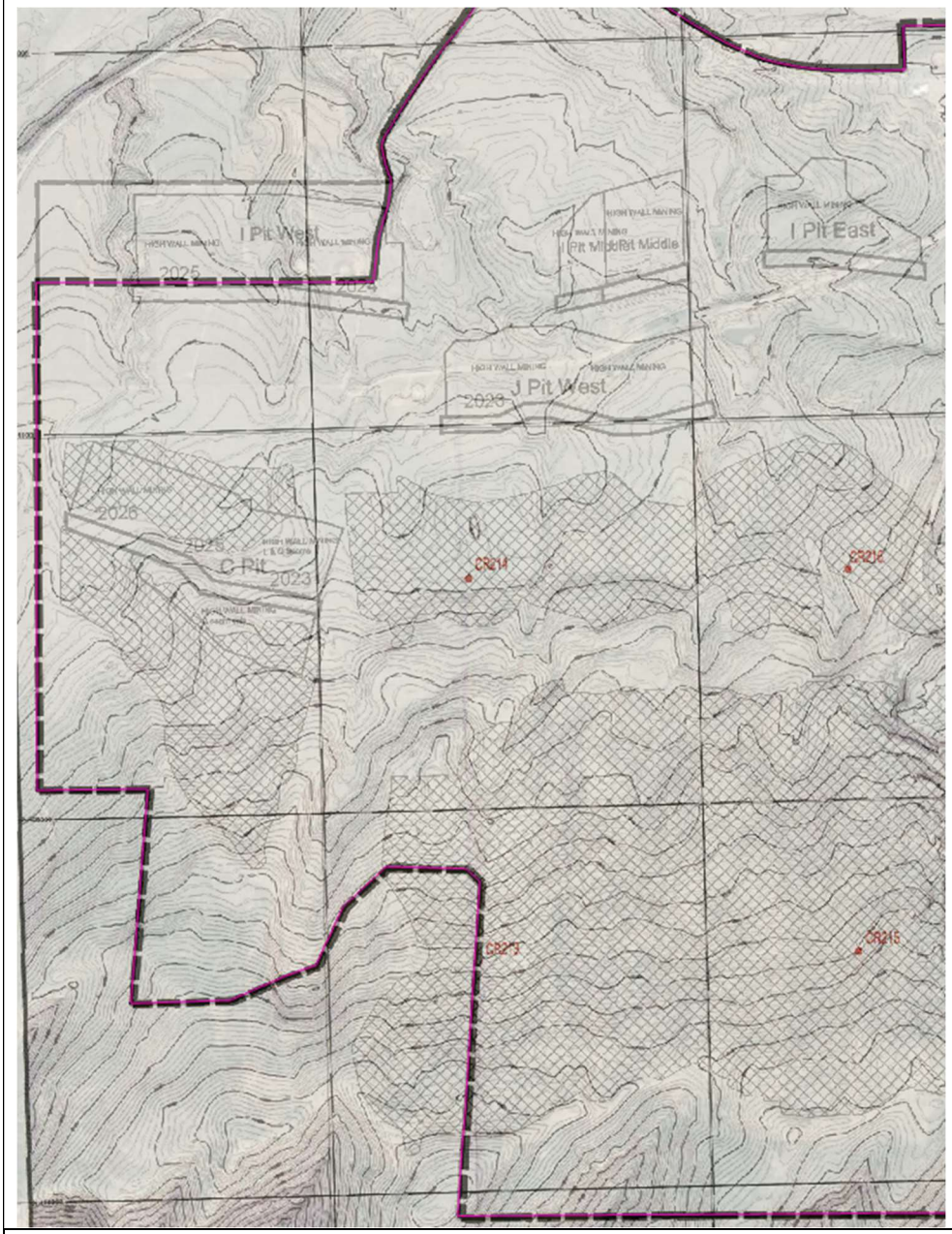

Figure 1: Screenshot showing currently approved permit boundary (pink polygon) and Map M36 (with core hole locations) overlain on proposed Map M4 (with pit locations)

Please update Section 2.7.2 with a discussion of the characterization of overburden geochemistry for the C, I and J Pits.

Trapper Response to Comments 39: The Trapper minesite has been extensively cored over its four decades of operation. The core holes demonstrated on Figure 1 were drilled to the deepest coal seams to be mined as required in Rule 2.04.6(2)(b). Proposed mining in PR-11 is encompassed in the upper strata of the

Williams Fork formation. The entire minesite and its geology has been well documented. The rock stratigraphy encountered in the I and J pits is typical of the upper strata described in Permit Section 2.7.1.2. Current mining in the I and J Pits, situated at the crop area of their respective target coal seams, is encountering weathered to highly weathered sandstones and other associated depositional layers such as sands and gravels. Four new monitoring wells, CY-A, CY-1, CY-2 and CY-3, were drilled in response to these planned activities after the approval of PR-10. A fifth well was completed in 2022, GX-1, for monitoring of the C Pit. Their drill logs are incorporated into Appendix V of the PAP.

The C Pit area will be a long box cut situated immediately down dip of the previously mined C Pit, which was a down dip strip pit mined into the 1990's. A buffer of undisturbed bedrock will be left between the historic endwall and the new highwall. The previous and new C Pit will mine down to the Q seam. This area has been well documented and previously disturbed. No further analysis should be required in this area.

The apparent purpose of the geochemistry analysis of the overburden is to determine the suitability of the spoil materials for backfill stability and possible growth medium issues. Permit Section 2.7.2 discusses at length the sampling program conducted on Trapper Mine spoils. Appendix I contains the results of the overburden testing program. Spoil analysis concluded one possible area of concern, mid-slope, in the east panel of the mine site. The overburden profile contained small sections directly adjacent to certain coal seams that could have potentially contained high ESP values. Extensive subsequent testing revealed no spoil toxicity issues with ESP or any other regraded spoil parameter. During operations at the site, core hole analysis was eventually stopped in favor of systematic spoil sampling of the final regraded surface. In 2000, with the approval of TR-89, no further spoil sampling was deemed necessary as no issues in the surface spoil materials in the regrade had been found. Historic sample results are documented in Permit Section 2.7.2.3 for the PR-7 expansion of the permit boundary. The analysis in the permit, confirmed through extensive sampling, proved the mixing of the spoil materials during backfilling operations eliminates any undesirable chemical characteristics. Current and future mining of the I, J and C Pit areas will rely heavily on truck loader operations. This will extensively mix the materials upon backfilling. Trapper does not anticipate any undesirable spoil characteristics in these pit areas.

Given the above discussion, Trapper does not feel that Section 2.7.2 requires updating.

40. Figure 2.7-5 (Page 2-393) is proposed to be added. The figure shows a typical stratigraphic section of the Trapper mine area, from the F-seam overburden to the R-seam. The pagination would place the figure into the currently approved PAP between an extensive discussion of overburden geochemistry in the PR-7 area (Section 2.7.2.3; Pages 2-391a through 2-391z) and Section 2.74, Pre-mining Conditions – Surface Water. No additional text is proposed that refers to or explains the significance of the figure.

Please explain proposed Figure 2.7-5.

Trapper Response to Comments 40: This figure was updated with PR-11 as the existing figure within the PAP did not include the stratigraphy above the interburden of the H seam. The units have also been updated with increased depth ranges to reflect conditions encountered on the site during the past 40 years. A reference to the figure is given on revised page 2-392 (enclosed). Page 2-392 is also updated with interburden depth ranges between Trapper's major coal seams.

Rule 2.04.7(1) Hydrology Description; Groundwater Information
DRMS 28 February 2023

41. Section 2.7.5.1d (Page 2-462o) describes aquifer characteristics of the I and J pits, it was last updated with PR-10.

Please update Section 2.7.5.1d to address the mine plan proposed with PR-11.

Trapper Response to Comments 41: The eastern extents of the I and J Pits were permitted with PR-10. Aquifer characteristics and hydrologic impacts were analyzed (by Hydro-Engineering; Casper WY, Trapper's long-term hydrology contractor) for that action and the potential proposed activities in PR-11. Section 2.7.5.1d is current and, relative to the proposed mining in PR-11, no updates were deemed necessary.

42. The water levels in the Twentymile Sandstone, Third White Sandstone, Second White Sandstone and Alluvial Aquifers are presented on Map 54G, which was last updated with PR-7 in 2014. The map shows projected contour lines at 100' intervals of the potentiometric surface in each of the named aquifers, from which the direction of groundwater flow can be inferred. The map suggests that groundwater flows generally to the NNW across most of the permit area in all three of the identified bedrock aquifers. There is an anomaly in the Third White Sandstone in the region of the PR-11 addition to the permit area (see Figure 2), where the 6300' contour line is shown curving dramatically around by 180°. If this line were accurate groundwater flow in the Third White Sandstone would be to the W, or possibly SW, beneath the proposed I Pit West, and neither of monitoring wells 81-03A or CY-3 would be downgradient of the proposed disturbance. Based on the information available in the PAP, the Division finds the projected potentiometric surface shown on the currently approved Map 54G implausible, particularly given that no such anomaly is shown in the Second White Sandstone which overlies it. According to Figure 2.7-4 (page 2-356) the axis of the synclinal basin is approximately 2 miles to the north, so there is no structural rationale.

Given that the Third White Sandstone is immediately below the G-seam (according to figure 2.7-18p, page 2462b), further characterization of this aquifer in the PR-11 area is warranted.

Characterization of the the alluvial aquifers in the three drainages in the west of the permit area appears to be lacking.

(a) Please discuss the anomaly in the Third White Sandstone aquifer described above.
(b) Please update Map 54G with the most recent data available to show the best possible prediction of the potentiometric surface in each of the named aquifers. (It may be necessary to collect data from another point south and west of 81-03A and CY-3)
(c) Depending on the response to (a) and (b), please propose an additional downgradient monitoring well in the Third White Sandstone if necessary.
(d) Please discuss the characterization of the alluvial aquifers in the west of the permit area.

Trapper Response to Comments 42:

(a) The water level elevations in the Third White Sandstone in the northwestern portion of the Trapper Mine are defined by the water levels in well 81-03A, CY-3 and GE-3 (prior to its abandonment in 2003). Water level elevations in wells CY-3 and GE-3 are lower than the water-level elevation in well 81-03A, indicating a depression in the piezometric surface to the south of well 81-03A. Water-level elevations in well CY-3 are higher than the water level elevation observed in well GE-3, indicating a gradient from the east to the west in this depression. This data indicates Third White Sandstone groundwater is flowing out of this aquifer to

the west in the area of the Yampa River alluvium. The geologic cross section to the west of the CY well locations shows the top of the Third White Sandstone very near the land surface (elevation of approximately 6250 ft-msl) in the Yampa Valley alluvial system to the west of the CY-3 well location. Therefore, the Third White Sandstone groundwater flow from the CY-3 area is expected to flow to the west to the Yampa alluvial groundwater.
(b) New maps M54I, M54J and M54K give projected potentiometric surface information for the QR aquifer, HI aquifer and FG aquifer, respectively.
(c) The CY-3 and 81-03A water levels, along with the historical water level, adequately define the groundwater flow in the Third White Sandstone aquifer in this area and shows that well CY-3 is an adequate downgradient monitoring well for the Third White Sandstone aquifer in this area.
(d) Permit Sections 2.7.7, 4.8.4 and Appendix H of the Trapper permit details the extent of alluvial aquifers and their possible impacts for the mine site. The only designated alluvial aquifers in the vicinity of the west panel were the Williams Fork and Yampa River floodplains. The Williams Fork river AVF will not be affected. The Yampa River AVF overlies the rock strata of the site in the Big Bottom Syncline. The mining disturbed strata dips deeply below this aquifer and was determined to be isolated from those aquifers. The smaller drainages in the I and J Pit areas do not contain significant enough alluvial deposits to create an aquifer.

43. There is currently no map in the PAP which shows location of the outcrop of the various aquifers identified within the permit area (or the coal seams).

It would make an assessment of the probable hydrologic impacts on groundwater significantly easier if these outcrop locations were shown on a map; Map 54G would be an ideal candidate. Is it Trapper's assumption that the recharge zone for each of these aquifers is at or near the outcrop?

Trapper Response to Comments 43: New maps M54I, M54J and M54K give projected cropline information for the Q and R, H and I and F and G coal seams, respectively. Yes, it Trapper's assumption that the recharge zone for each of these aquifers is near the outcrop.

44. Baseline groundwater quality information is presented in Section 2.7.5.2 of the currently approved PAP (Page 2-463). The text, which is not proposed to be revised, states that:

Water quality has been monitored at five different locations at the mine site; Sites GA, GB, GC, GD and GE are shown on Map 52

Please update Map 52 with the locations of sites GA, GB, GC, GD and GE.

Trapper Response to Comments 44: This statement may seem ambiguous but it is referring to the series of monitoring wells drilled over the years on the site. All monitoring wells (past and present) are detailed in Table 2.7-20 of the permit. Current existing monitoring wells are given on Map M52. Wells such as GC-1, 2 and 3 and GD-2 and 3 are still on this map. The GA, GB and GE well series were sealed and abandoned, as noted on Table 2.7-20, and were removed from the map. However, the comprehensive data obtained from these wells over many years is still relevant when analyzing baseline water quality in the west panel of the mine site. References to these wells and their data has been retained.

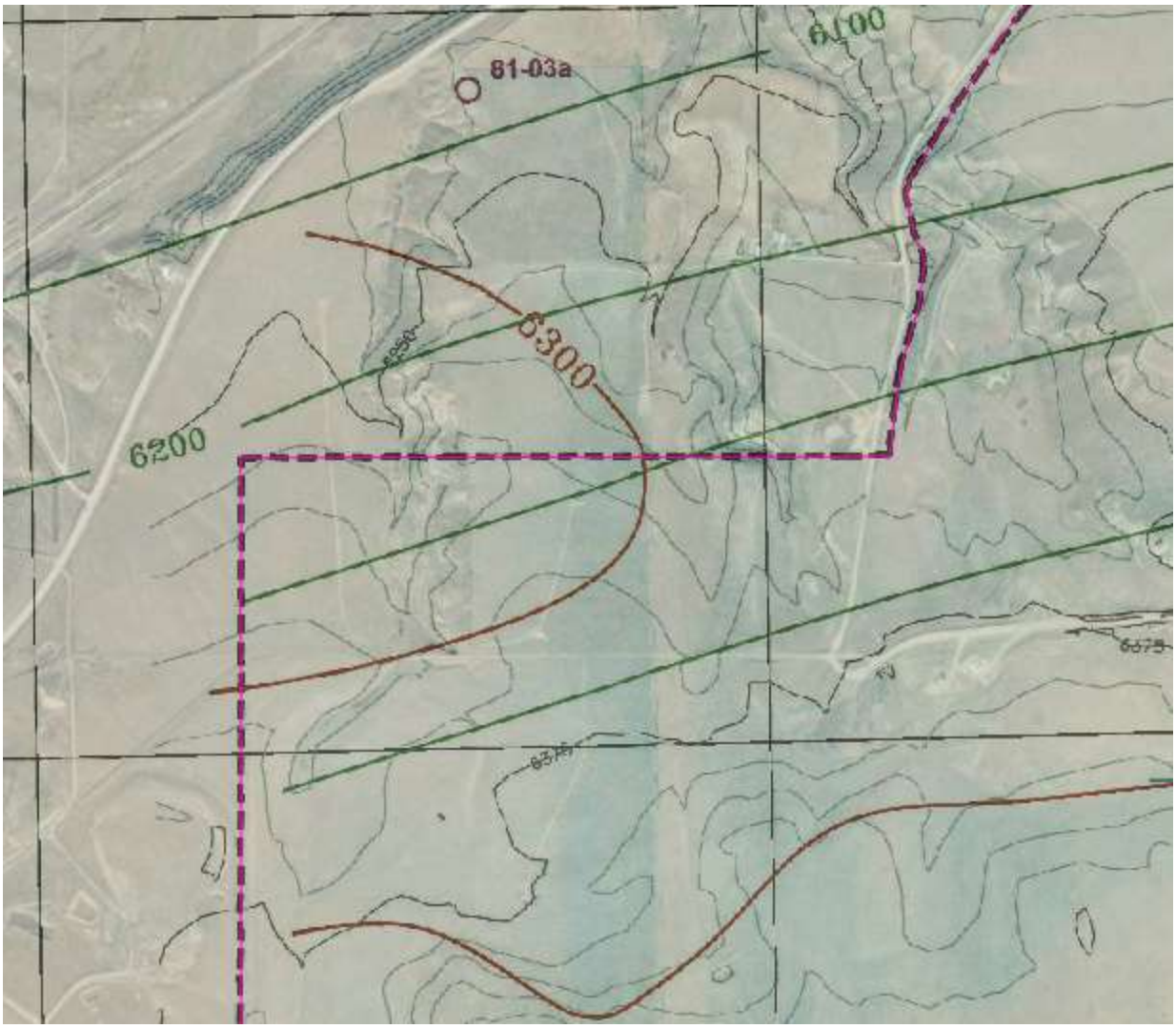

Figure 2: Screenshot showing currently approved permit boundary (pink polygon) overlain on currently approved Map M54G, with potentiometric surface of Third White Sandstone (red contour lines) and Second White Sandstone (green contour lines).

45. Section 2.7.5.2d (pages 2-520yy to 2-520zz), which is proposed to be revised, describes groundwater quality in the I and J pits, including the PR-11 expansion area. It does not mention the C pit, the mining of which is newly proposed with PR-11.

Please update Section 2.7.5.2d to include the new C pit. Please also clarify in the text which seams will be mined in each pit.

Trapper Response to Comments 45: Proposed mining in C Pit will be immediately down gradient of previous, extensive, mining in C Dip Pit. Water quality in the backfill aquifers has been collected at wells GD-3 and GF-11 for many years. These wells are paired with monitoring wells GD-2 and GF-6, which are drilled in un-mined material immediately downgradient of the endwalls of historic D and E Pits. The position of C Pit is similar in nature to these monitoring scenarios and the impacts of such are well documented. Mining in all of these pits went down to at least the Q seam and sometimes to the R seam. Mining in C Pit will be within the historic assumed plume below C Dip Pit. After mining was completed in the west panel and subsequent Phase III bond release of the majority of that area, monitoring well GE-1 was

abandoned. This well monitored the Q seam aquifer down gradient of the previous mining in the western portion of the west panel. During the summer of 2022 a new well was drilled northwest of the proposed C Pit to once again monitor the Q seam aquifer downgradient of this pit. Probable impacts to this aquifer are assumed to mirror the previously observed impacts in D and E pit.

Seams to be mined in the I and J Pits and their respective minor aquifers are defined in Permit Section 2.7.5.1d.

46. Section 2.7.5.2d refers to the GLUX-1 well as a source of baseline water quality data for the First White Sandstone.

Please update Map 52 with the location of the GLUX-1 well.

Trapper Response to Comments 46: GLUX-1 well was abandoned in 2006 following Phase III bond release of the lands above it. It was removed from Map M52 at that time. Only current, active wells are demonstrated on the map. Historic GLUX-1 well data and location coordinates are given in Table 2.7-20 (page 2-457).

Rule 2.05.6(3) Protection of hydrological balance

DRMS 28 February 2923

47. Several qualitative statements are made about the movement of groundwater in proposed Sections 2.7.5.2d and 2.7.5.3d (pages 2-520yy to 2-520zz and page 2-523aa). Estimates of aquifer properties will allow the Division to better assess these statements.

Please update Table 2.7-21b (page 2-462f) with data that has been collected since 2000. Please also add a column for aquifer thickness to the table.

Trapper Response to Comments 47: There is no new testing information to add to this table. In addition, aquifer thicknesses vary across the mine site and no information is available for the table.

48. Proposed Map 31 shows the locations of neighboring wells completed in the First, Second and Third White Sandstone aquifers, within one mile of the I and J Pits. Proposed Section 2.7.5.4b (page 2-524i) discusses potential impacts to these wells. LUX Well No 1, W1406-78 is shown on the map.

Is LUX Well No 1, W1406-78 the same well as GLUX-1?

Trapper Response to Comments 48: These are not the same well; one is a residential water well and the other was a Trapper constructed monitoring well. Please see previous response to comment 46.

49. The second paragraph of proposed Section 2.7.5.4b states that LUX Well No 1, W1406-78 may be impacted by upgradient mining, but the location of LUX Well No 1, W1406-78 appears to be inside the boundary of the proposed I Pit West which suggests that it will be destroyed by mining.

Please clarify the predicted impacts to LUX Well No 1, W1406-78.

Trapper Response to Comments 49: The water rights filing with DWR is incorrect and places the filing location for well W1406-78 in the wrong quarter section. The well is actually located just north of the proposed new permit boundary near the Lux private residence, as depicted on Map M1. For clarification,

a revised Map M31 has been provided with the as-built location of the well and not the water rights filing location. The close proximity to proposed mining creates a high potential for permanent impacts to this well. Trapper estimates this well is completed to at least the base of the 1st White Sandstone, and most likely penetrates through the F coal seam and possibly into the roof of the 2nd White Sandstone. Proposed mining of I Pit West will involve disturbance of the initial box cut on the southern fringe of the 1st White Sandstone. This disturbance may not be enough to impact the well in itself as the pit will be approximately 1600 feet from the well. However, if maximum penetration of the HWM panel entries of 1200 feet is realized, that will bring subsurface disturbance to within 400 feet of this well. Depending on aquifer conditions, TDS concentrations and possible increased transmissivity due to the HWM entries, the well may be directly impacted in a short amount of time. Alternatively, it is also possible the upgradient mining impacts could be negligible, water drawdown may not be significant and recharge could even increase with the cropline oriented boxcut. Permit Sections 2.7.5.4b (page 2-524i) and 4.8.2.2 (page 4-226b) discusses the potential ground water quality impact to the Lux well. In Permit Section 4.8.2.2 (page 4-226c) Trapper commits to "replace the water supply of any owner of a vested water right which is proximately injured as a result of the Trapper Mine."

50. The third paragraph of proposed Section 2.7.5.4b states that:

...wells 151991 and 93848 exist greater than one mile west of the western planned edge of the J West Pit 1 HWM

Comparing Maps 4 and 31, the wells appear to be significantly closer than one mile to the proposed I Pit West.

Please revise the third paragraph of proposed Section 2.7.5.4b to predict the impacts of the mine plan proposed with PR-11 to wells 151991 and 93848.

Trapper Response to Comments 50: Wells 151991 and 93848 appear to be completed within the 3rd White Sandstone. The I Pit will penetrate to the F seam at the base of the 1st White Sandstone. It is assumed a tight shale layer in the 2nd White Sandstone serves as an aquitard and isolates these layers from the 3rd White Sandstone. J Pit will penetrate to the G seams at the roof of the 3rd White Sandstone. J Pit will be more than one mile from these wells at its western extent and terminus. It is unlikely to impact these wells. These impacts are discussed in Permit Sections 4.8.2.2 and 4.8.2.2a. Third White Sandstone monitoring well CY-3 is upgradient of these two wells and should adequately monitor the potential impacts to these wells.

51. [This item is included as a placeholder – further adequacy questions related to the protection of the hydrologic balance are expected to come up following Trapper's response to this review].

Rule 4.05.13 Surface and Ground Water Monitoring

DRMS 28 February 2023

52. In the 2021 AHR, in the introduction, it is reported that:

Mining activities during 2021 include continued expansion of the L and N pits and the initial removal of coal in the I Pit West

The I Pit West is not shown on the currently approved version of Map M4, Life of Mine Plan (dated 3/30/22). It is the Division's understanding that the I Pit West is being proposed with this revision (i.e. PR-11).

Please clarify whether mining of the I Pit West has already begun, or whether this is a typo in the 2021 AHR.

Trapper Response to Comments 52: This is a semantics issue. The I Pit has currently been broken into three sections, or separate pits. At the time the 2021 AHR was drafted the western most pit excavation was called I Pit West. This is actually the middle pit of the three pits. The western most pit, I Pit West, as proposed on the PR-11 materials has not been disturbed as of yet.

53. Proposed Section 4.8.5.2 (page 4-242) describes the groundwater monitoring plan. The text states that:

In Technical Revision TR-93, the Division and Trapper Mining Inc. agreed that well GP-9 is the point of compliance for the Basic Standard for Ground Water for the Third White sandstone. In Technical Revision TR-96, the Division and Trapper Mining Inc. agreed that the Coy well is the point of compliance for the Basic Standards for Ground Water for the Flume Gulch alluvium.

Clearly GP-9 is not appropriately located to act as a point of compliance for the disturbance proposed with PR-11.

Please propose additional points of compliance for all aquifers that have the potential to be impacted by the disturbance proposed with PR-11, including alluvial aquifers.

Trapper Response to Comments 53: Wells CY-1 and CY-2 adequately monitor the 1st and 2nd White Sandstone aquifers downgradient of the present I Pit mining, while well CY-A monitors downgradient of the Coyote alluvial aquifer. Well CY-3 will adequately monitor the 3rd White Sandstone downgradient of the J Pit mining. Before Points of Compliance and associated standards are set, we feel these wells should just be considered downgradient monitoring wells until such time as sufficient data is available to define natural background concentrations. This issue will be further evaluated in a forthcoming Technical Revision to address a new I Pit mine plan.

54. The applicable standard at the points of compliance is the Interim Narrative Standard from Regulation 41, The Basic Standards for Groundwater (Reg 41). The Division does not have the authority to set standards, but it does have the authority to use historic monitoring data to determine numerical values for groundwater quality parameters, if suitable data is available. If no data is available then the most stringent values from Tables 1 – 4 of Reg 41. (Further details of the Division's interpretation of Reg 41 is given in a Groundwater Monitoring and Protection Technical Bulletin published in 2019, and available via the Division's website, or directly from the reference given below).

Please consider formalising how the Interim Narrative Standard will be applied at the groundwater points of compliance either with PR-11, or with a Technical Revision following the approval of PR-11.

Trapper Response to Comments 54: Trapper believes that it would be inappropriate to set standards that will be applied to Points of Compliance until more analysis of the full range of natural background concentrations is better defined from additional groundwater monitoring. This issue will be further evaluated in a forthcoming Technical Revision to address a new I Pit mine plan.

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

Sincerely,

Graham Roberts
Environmental Supervisor
Trapper Mining Inc.

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