TRAPPER MINING INC.

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April 5, 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. 3

Dear Ms. Reilley:

Enclosed is our response to your Adequacy Review #3 letter of March 29, 2023 and additional comments received April 3, 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 second response have been removed from this correspondence. Comments regarding correspondence and comments with SHPO remain with the commitment to follow the proposed cultural resources stipulation. A survey area of 29.4 acres was determined to be outstanding within the currently proposed PR-11 application. A map of the applicable survey areas is enclosed.

Outstanding comments concerning the geotechnical analysis for C-Pit remain as it was indeterminate if they had been fully reviewed and accepted by DRMS.

Stratigraphic cross sections of the PR-11 expansion area are enclosed for reference concerning ground water quality analysis for that area. A plan view of the cross sections and three cross sections (two north/south and one east/west) are presented.

Discussions concerning comments 53, 54 and 55 with DRMS staff on April 4, 2023 resulted in the decision by Trapper Mine to formally withdraw the proposed I-Pit West and all related disturbance at this time. Approval of the PR-11 Permit Revision has become urgent in order to continue timely production and coal deliveries for Trapper Mine to the Craig Station. Adequacy questions raised concerning the I-Pit West area and related possible hydrologic impacts cannot be adequately addressed at this time. Trapper is committed to addressing the concerns raised by the Division and will do so with a forthcoming Technical Revision that will re-propose activities for I-Pit West and properly analyze possible hydrologic impacts in this area of the mine. As a result of this withdrawal, several previously submitted permit maps as part of PR-11 have been revised to remove the proposed mining of I-Pit West.

The following revised permit narrative pages are enclosed: i-5 and 2-520vvvv. The following revised permit tables are enclosed: Table 2.7-20 (p. 2-456 to 2-457). The following revised permit figures are

enclosed: Figure 2.7-18p (p. 2-462b). The following revised maps are enclosed: M4; Life of Mine Plan, M4A; Pit Boundaries and Areas of Disturbance, M10A; Mining and Regrade (Sheet 1), M10B; Topsoil Stripping and Reclaim (Sheet 1), M12; Postmining Topography (Sheet 1), M51; Drainage and Sediment Control Plan (Sheet 1), M52; Hydrology Monitoring Locations, Light-Use and Access Roads.

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.

Second Additional Trapper Response: Trapper accepts the recommendations of SHPO and the pending stipulation to the approval of PR-11. See included map of areas stipulated for further cultural surveys.

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.

DRMS 28 February 2023
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.

Second Additional Trapper Response: Trapper accepts the recommendations of SHPO and the pending stipulation to the approval of PR-11. See included map of areas stipulated for further cultural surveys.

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.

42. (4) 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.

DRMS Comments: Please provide a reference for the geologic cross section to the west of the CY well locations.

Trapper Response to Above Comments: Cross sections are provided with this correspondence that have been updated with all current relevant coring data for the I and J pit areas. The approximate locations of the I, J and C Pits have been illustrated on these cross sections. Also the relevant monitoring wells and private domestic wells have been placed on the cross sections to demonstrate the approximate strata in which they occur and their locations relative to the proposed pits and high wall mining. Please understand these are based on core hole drilling, due to the dip and strike of the strata some layers may appear to be improperly correlated to some of the wells. This is due to the distance of the applicable cross-section either east or west of some wells. Overall it demonstrates in far greater detail the assumed geology of the area. This information was used during analysis for PR-10 and has been adjusted to better reflect the required information pertaining to PR-11. Trapper and Hydro-Engineering still assume the locations of the CY series of wells will adequately represent water quality changes and possible impacts in this area of the mine.

44. (6) 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.

DRMS Comments: The Division agrees that the comprehensive data obtained from these wells is relevant when analyzing baseline water quality at the mine, and notes that the information is retained in Table 2.7-20. Map 52 has an item in the legend for "Wells discontinued from monitoring" with the light blue hollow circle symbols. It would be helpful for the current review, and for future hydrologic reviews, if the location of the monitoring wells listed in Table 2.7-20 were shown on Map 52.

Trapper Response to Above Comments: All historic monitoring wells have been re-mapped to the M52 Hydrology Monitoring Locations, Light-Use and Access Roads Map. This map now correlates with Table 2.7-20. An error on the location of the GLUX-1 well was found in table 2.7-20, Trapper apologizes for any confusion this erroneous location may have caused during this evaluation. The table has been revised with the correct as-built location of GLUX-1 well which was subsequently abandoned in 2006. The majority of the wells now depicted on M52 as "Wells Discontinued from Monitoring" have been sealed and abandoned.

45. (7) 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 down-gradient 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.

DRMS Comments: The information provided in the March 14 letter is helpful, but the point remains that a new pit has been proposed with PR-11 but the groundwater quality in the pit is not discussed in the PAP text proposed to date. Please add a paragraph or a sub-section to Section 2.7.5.2 that explicitly discusses groundwater quality in the new C Pit proposed with PR-11, and directs the reader to the relevant historical information.

Trapper Response to Above Comments: As the new proposed C Pit is essentially an extension of the historic C Pit the baseline water quality data contained in PAP section 2.7.5.2 is relevant for this pit as it pertains to the original analysis conducted on the western portion of the mine site. A new section; 2.7.5.2e has been added to PAP page 2-520vvvv with additional information pertaining to C-Pit. PAP section 4.8.3 is the "Probable Hydrologic Consequences" section and is also applicable to the current water quality scenario present in the area of the newly proposed C-Pit. As the area and seams to be mined have already been mined within close proximity of the new pit, water quality is expected to be same as has been projected at this current time and should see the same effects of mining as has been observed in other observation wells near the D and E Pits.

46. (8) 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).

DRMS Comments: GLUX-1 does not appear in Table 2.7-20; is GLUX-1 the same as LUX-1? Map 52 has an item in the legend for "Wells discontinued from monitoring" with the light blue hollow circle symbols. It would be helpful for the current review, and for future hydrologic reviews, if the location of the monitoring wells listed in Table 2.7-20 were shown on Map 52.

Trapper Response to Above Comments: Trapper has noted this omission on Table 2.7-20 and has revised the text. See above response to comment 44 concerning historic wells on Map M52.

Rule 2.05.6(3) Protection of hydrological balance

DRMS 28 February 2923

47. (9) 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.

DRMS Comments: The variability of aquifer thicknesses is acknowledged, nevertheless it would be helpful to know at least the thickness of the aquifer at the points where aquifer properties have been measured – presumably the information is available from drilling logs. Several monitoring wells have been constructed since Table 2.7-21b was last updated. Monitoring wells should typically be tested at the time of construction, and the results of the tests should be added to the PAP in order to support the predictions made about the movement of groundwater. With reference to PR-11, where impacts are anticipated to the 3rd White Sandstone and 2nd White Sandstone, the nearest wells used to characterize these aquifers (that are shown in Table 2.7-21b and on Map 52) are in Pyeatt Gulch, at least 4 miles to the east of the proposed new disturbance. No well test data from any of the wells in the western part of the permit area has been included in the table.

Trapper Response to Above Comments: Trapper does not readily have aquifer thickness defined to that level of detail. Figure 2.7-18p was inadvertently omitted from the original submittal of PR-11. It has been included in this response and helps to further demonstrate and define the applicable aquifers at Trapper and within the PR-11 expansion area. Figure 2.7-5 may also be used to infer the general thicknesses of the aquifers on the site based upon interburden thicknesses encountered during the mining process. Appendix V of the PAP contains the well pumping studies and data from which table 2.7-21b is derived. Appendix V also includes some, but not all, of the well construction logs. Wells CY-A, 1, 2, 3 and GX-1 are included in this appendix. Included with this correspondence is also a series of cross sections pertaining to the PR-11 expansion area that also demonstrate possible aquifer depths and thicknesses. Recent installations of monitoring wells were not tested due to the assumption they would exhibit similar qualities to previously tested wells on the site. While the division notes wells in the Pyeatt drainage area are used for comparison, there were historic wells near the PR-11 expansion area in the western portion of the mine that were

evaluated. Revisions to Map M52 will help to better clarify this relationship. Transmissivity and recharge evaluations were conducted as follows. Well GLUX-1, approximately 1500 feet west by southwest of CY-1 defines the 1st White Sandstone. Well GE-3, approximately 3500 feet southwest of CY-2 defines the 2nd White Sandstone. Wells GB-2 (approximately 7700 feet southeast) and GBB-2 (approximately 6200 feet west) define the 3rd White Sandstone. Well GE-1, approximately 2200 feet north of GX-1 defines the QR aquifer. Other applicable wells on the site with respect to the designated aquifers typically exhibit similar qualities across the site. The CY and GX wells were not anticipated to be significantly different than results previously documented on the site. Further analysis of aquifer characteristics may be warranted within a forthcoming Technical Revision for a new mine plan in I-Pit West.

53. (15) 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 deposits. Well CY-3 will adequately monitor the 3rd White Sandstone downgradient of the J Pit mining. The nearest documented alluvial aquifer is the Yamp River bottom area. It was determenined (PAP Appendix H) that this aquifer would not be affected by mining operations at Trapper. Before Points of Compliance and associated standards are set Trapper will evaluate the current data available to define natural background concentrations. Trapper is formally withdrawing the proposed disturbance in I-Pit West within the PR-11 application at this time. This issue will be further evaluated in a forthcoming Technical Revision to address a new I Pit mine plan.

DRMS Response: These groundwater points of compliance wells must be established prior to Division approval of a mine plan that could impact the aquifers in accordance with Rule 2.05.6(3)(b)(iv). Please establish groundwater points of compliance for the western permit area at the Trapper Mine, pursuant to Rule 4.05.13(1).

54. (16) 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 formalize how the Interim Narrative Standard will be applied at the groundwater points of compliance with PR11.***

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 and historic baseline data present at the site. Trapper is formally withdrawing the proposed disturbance in I-Pit West within the PR-11 application at this time. This issue will be further evaluated in a forthcoming Technical Revision to address a new I Pit mine plan.

55. (17) Section 2.7.5.4b predicts potential adverse impacts from the backfilled I and J pits to water quality in the 1st, 2nd and 3rd White Sandstone aquifers. **Therefore, please address the following:**

a. **Please provide a plan to control as per Rule 4, groundwater drainage through and out of the proposed permit and adjacent area per Rule 2.05.6(3)(b)(i) to address these impacts.**

b. **Please provide a treatment plan for groundwater drainage from the area affected by the proposed activities and proposed quantitative limits on potential discharged pollutants subject to applicable State and Federal Laws per Rule 2.05.6(3)(b)(ii).**

c. **Please provide a hydrologic reclamation plan addressing any potential adverse hydrologic consequences identified in the probable hydrologic consequences determination of PR11 for the 2nd and 3rd White Sandstone. This plan shall include preventative and remedial measures as necessary to prevent material damage, to minimize hydrologic impacts, to meet the performance standards of Rule 4.05, and a plan for the restoration of the approximate recharge capacity of the permit area and adjacent area in accordance with Rules 2.05.6(3)(b)(v) and (vii).**

Trapper Response to Comments 55: Please see the above comments regarding further work to be done concerning points of compliance and hydrologic analysis of the western permit expansion area. Trapper is formally withdrawing the proposed disturbance in I-Pit West within the PR-11 application at this time. These issues 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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