



TRAPPER MINING INC.

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April 12, 2023

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-133
2022 Annual Report, Appendix W Responses to CDRMS Comments**

Dear Ms. Reilley:

Please accept this letter as our response to the adequacy review letter dated March 31, 2023. Items requiring a response have been copied below, Trapper's comments follow each as applicable.

DRMS 31 March 2023

Acres disturbed should not be greater than the sum of:

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

For the 2022 ARR Trapper's values provide the above result. However, DRMS calculates 6,906 acres of disturbance versus Trapper's 6,900.7 acres.

The Division reviewed the above referenced report, and found that it **adequately** meets the Rules cited above. DRMS does however have adequacy questions as follows:

DRMS 31 March 2023

- 1. The 2022 ARR indicates a 6,900.7 acres of disturbance. DRMS calculates 6,906 from the values provided in the ARR Report Form.*
- 2. Trapper indicates that 51.6 acres were subtracted from Phase III released acres. However the Phase III acres increased by 213.9 acres. DRMS believes that the acres subtracted should provide a value of 3,540 for Phase III released acreage.*

Trapper Response:

1. The value of 6,900.7 acres is correct for total disturbance for the minesite. The incorrect value of 51.6 acres was used in the "Acres Subtracted" column on the 2022 ARR Form. This value should be 56.9 acres. This acreage accounts for 51.6 acres of direct re-disturbance of Phase III bond released lands in the J-Pit area and the southern end of D-Pit. The additional acres account for 0.4 acres of Phase II released land in the SL-4 road corridor in D-Pit and 4.9 acres of land re-disturbed in parcel E-AB-08 that had not achieved any level of bond release. Total disturbance for 2022 was 85.3 acres, but these

56.9 acres have to be subtracted from the total disturbed acreage sum as they have already been accounted for in the past.

2. AS noted in the prior response 51.6 acres of Phase III bond released parcels were re-disturbed in 2022, this value must be removed from the total Phase III bond released sum. SL-23 achieved final approval on January 8th, 2022 and therefore must be accounted for in the 2022 ARR as an increase to the Phase III sum. This value was omitted from the 2022 ARR form. I apologize for the confusion over this sum. With SL-23 added to the Phase III total and the re-disturbance removed, the total acreage of 3,805.5 is correct.

A revised 2022 Annual Reclamation Report Form is included and should replace previously submitted materials.

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

Sincerely,

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

Graham Roberts
Environmental Engineer

GCR [M/Permit Revisions/TR-133 Response1 CL.doc]

c File 109.2.3.4 w/o attachments
Revisions File