



TRAPPER MINING INC.

P.O. Box 187

Craig, Colorado 81626

(970) 824-4401

April 13, 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. 6

Dear Ms. Reilley:

On April 12, 2023 the Division presented comments in regard to the Agapito Associates Dragline Spoil Stability Analysis for the C-Pit. Verbal discussion with the Division also resulted in a comment regarding reference to the Agapito Associates study used for HWM planning and the likelihood of post mining subsidence. The Division requested a reference to this report be made on PAP page 3-15c and that the report be provided to the Division.

A revised page 3-15c has been enclosed, this page is packaged with pages 3-15 to 3-15d. The Agapito Associates Inc. report "SUMMARY OF GEOTECHNICAL DESIGN AND OPERATIONAL CONSIDERATIONS FOR HIGHWALL MINING—I, J, N, AND L PITS, TRAPPER MINE" has been enclosed for DRMS reference. Subsidence discussions are contained on page(s) 3-1 and 6-3.

Division comments April 12, 2023:

The Division reviewed the Agapito Associates, Inc. (Agapito) report submitted with PR11 titled "Geotechnical Assessment of Dragline Spoil Stability Along the North Crest of C-Pit at Trapper Mine" to the applicable Rules (2.05.3(6) and Rule 4) and with similar reviews of spoil piles by the Division at the Trapper Mine.

On Page 12, Section 6 – Conclusions and Recommendations the report states, analysis results obtained from 2D numerical models developed along five representative vertical sections through the proposed C-Pit excavation and spoil pile indicate that the pile is likely to have FoS values equal to or greater than 1.3, which is the criterion outlined in this assessment for long-term stability. Therefore, the proposed spoil pile is likely to be stable over the anticipated storage period (6 to 8 years).

The Agapito report states the factor of safety for the south slope of Section 4 at 1.29. Please explain this discrepancy and/or reconfigure the stockpile geometry to achieve a factor of safety of 1.3 or greater.

Trapper Response to Comments:

The spoil pile within C-Pit will be temporary in nature and is simply dragline spoils piled on the boxcut highwall. It appears Agapito rounded this value for their report. The average factor of safety value of all sections combined is 1.367. Please understand this was a draft report prepared for planning purposes of C-Pit. The report also insinuates if less material were placed in these piles, as in less vertical height the factor of safety is likely to increase. In any scenario the report is a planning tool to use before the final pit design. Trapper is continuing to analyze the ultimate mining plans for this pit, including moving some of this material to the south highwall, and some material will be moved with truck and loader. These planned modifications may modify the safety factor and can be provided in a forthcoming technical revision for C-Pit.

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

Sincerely,

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

Graham Roberts
Environmental Supervisor
Trapper Mining Inc.

c PR-11 binder