



TRAPPER MINING INC.

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April 24, 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

Technical Revision TR-134: C Pit, I Pit East and J Pit Dragline Cuts

Dear Ms. Reilley:

This technical revision is being submitted to revise topsoil stripping areas in the C, I and J-Pit areas. The enclosed material includes maps that present the proposed changes. Proposed changes and permit updates include:

- In J-Pit area additional stripping is needed to open additional cuts of this pit with a dragline to the north of the current cut to maximize surface mining tons. Once the additional dragline cuts are completed the final cut will be highwall mined as originally proposed. An additional 34.7 acres of stripping is proposed north of the current J-Pit to facilitate three more additional dragline cuts.
- In the C-Pit area, revised pit designs developed by Agapito Associates, has changed the orientation of C-Pit as proposed in PR-11. This change in pit shape and pit entrance ramps will require additional stripping. An additional 75.8 acres of stripping is proposed in this area.

With the proposed changes to J-Pit and the additional topsoil stripping in J and C-Pit, the bond amount must be increased to account for the additional acres of stripping which is an increase over that requested in PR-11. Additional bond is proposed to cover topsoiling and seeding these additional acres. Trapper has calculated total additional bond for this action is at \$547,455. Adequate bond is held by Trapper for this action at this time.

New additional acres of disturbance requested is 110.8 acres and 81.6 acres additional to the affected acres, (which includes the 110.8 acres of disturbance and proposed highwall mining areas beyond current and proposed disturbance acres but reduces the affected acreage change due to less affected areas being beyond the increased stripping acres when compared to PR-11.)

Trapper is aware there are some proposed areas of new stripping that will be subject to new cultural resource surveys per SHPO review. In the interest of expedited review and approval of this Technical Revision please stipulate any requirements of SHPO so that areas that do not require review may be

stripped and mined as soon as possible. Trapper has already selected a contractor to be on site once field conditions are conducive to a study and the areas stipulated under PR-11 and this Technical Revision will be surveyed and the results submitted to DRMS and SHPO as required.

The following revised permit pages are enclosed:

- Page i-14, revised appendices, new Appendix X added
- Page(s) 3-15 to 3-15d, revised pit discussion

The following revised appendix materials are enclosed:

- Appendix A, Appendix A TR-134 Addendum for additional topsoiling and seeding costs
- Appendix X, Added Appendix X to PAP for HWM design criteria as developed by Agapito Associates. A new cover has also been provided for PAP Volume VIII to include the new APP-X, it has been included here, although out of sequence, as the APP-W is continually added to the permit each year for the Annual Reclamation Report and volume numbers increase with it each year.

The following revised maps are enclosed:

- M4, Sheet 1; Updated pit boundaries
- M6, Sheet 1; Updated PMT/stripping limit for WCB year for J-Pit.
- M9, Sheet 1; Updated haulroad orientation for C-Pit
- M10A, Sheet 1; Updated stripping limit for C/J-Pit.
- M10B, Sheet 1; Updated stripping limit for C/J-Pit.
- M12, Sheet 1; Updated PMT for C/J-Pit.
- M51, Sheet 1; Updated stripped areas for watersheds

Please contact us with any questions, comments or concerns.

Sincerely,



Graham Roberts
Environmental Supervisor
Trapper Mining Inc.

c Revisions binder
File 109.2.3.4
Foster Beckett, BLM