



31 March 2023

Graham Roberts
Trapper Mine, Inc.
P.O. Box 187
Craig, Colorado 81626

RE: Trapper Mining Inc, Permit; C1981010
Adequacy Review, Preliminary: 2022 Annual Reclamation Report (ARR), TR133

Dear Mr. Roberts

The Colorado Division of Reclamation, Mining and Safety (The Division), received Trapper Mine's 2022 Annual Reclamation report (2022 ARR), TR133 on 14 March 2023 via electronic submission. The report contains all the information required by Rule 2.04.13(1) and (2). The Division found the application complete on 22 March 2023. Field verification of backfilled and graded topography (as per Map 1 (M1)) is not foreseen until completion of grading to final AOC. No acres were topsoiled in 2022.

The Reclamation Summary Table; Table 1.1 of Section 1, summarizes all reclamation activities achieved in 2022. The Section 1.2.1 of the report indicated that disturbance totaling 85.3 acres in the form of topsoil stripping and redisturbance of Phase III occurred in conjunction with D, I and J Pit activities. Backfilling, grading, topsoiling and seeding did not occur according to the 2022 annual report year. The DRMS form submitted by Trapper Min Inc, corroborates these values.

Rule 2.04.13(1):

The name and address of the permittee is provided.

The location and number of acres disturbed during 2022 are discussed in Section 1.2.1 in Appendix W, and Map 1. The report indicated that disturbance totaling 85.3 in the form of topsoil stripping in D, I and J Pits and redisturbance associated I and J Pit activities occurred in 2022.

Previously Phase III bond released lands at D Pit were redisturbed in 2022. *The Redisturbance Reclamation Summary Table*; Table 1.2 of Section 1, summarizes areas of redisturbance by parcel.

Backfilling and grading (B & G), topsoiling and seeding comprised zero acres. Backfilling and grading are discussed in Section 1.2.2, and indicated on Table 1.1 of Appendix W.

The location and the number of acres topsoiled during 2022 are discussed in section 1.2.3, and indicated on Table 1.1 of Appendix W. The number of acres coincides with the number of acres backfilled and graded.



Map 1 of Appendix W depicts all previously planted parcels at the site. Each parcel identifies the acres and the year seeding occurred.

Trapper permanently seeded zero acres of land in 2022. Acres seeded during 2022 are discussed in section 1.2.4 of Appendix W. Revegetation seed mixes are discussed in section 7.3 and associated tables of the report. Trapper included an invoice from Stevenson Intermountain Seed, Inc. in Section 7 of Appendix W illustrating the reclamation seed mix utilized.

Section 1.2.5 of Appendix W discusses the cultural practices conducted in 2022. Separate sections in the report discuss each unique practice. Cultural practices include and are not limited to:

- Drainage reconstruction
- Development drilling
- Topsoil pile construction

Rule 2.04.13 (2):

Section 3 of the report indicates that improvements and repairs were conducted on reconstructed drainages. No new drainage construction occurred in 2022. Dredging of sediment pond No Name #2 occurred and dozer basins in East Pyeatt, Oak, Middle Flume and Deal systems were cleaned.

Table 5-1 in Section 5 of Trappers report provides geographic locations for each of the topsoil stockpiles and the approximate volume stored in each pile. Topsoil stockpiles are depicted on the maps associated with the submission in Appendix W. Over the course of 2022 four new topsoil piles were constructed, and one topsoil pile nearly depleted as topsoil laydown in D Pit was staged.

Stock tanks and dozer basins are discussed in Section 6.0 of the report.

In accordance with section 3.6.3.5 of Trapper's permit, Trapper Mine must provide the Division with the proposed list of plant species to be used each year. It appears, per Tables 7-1 through 7-4 of the ARR submission, the number of species for plant type (grasses, forbs and, shrubs) and the amount of seeds to be applied are in accordance with Trapper's approved seed mixtures.

No vegetation monitoring occurred in 2023.

Acres disturbed should not be greater than the sum of:

- Acreage in active mining
- Backfill and grading
- 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.*

Please check the above mentioned discrepancies and provide additional information, an explanation and a revised ARR form as needed. Please provide responses to the above items by 21 April 2023 for DRMS review before the decision due date of 21 May 2023.

I'm available to discuss any questions or concerns.

Best Regards,

A handwritten signature in blue ink that reads "Robin Reilley". The signature is written in a cursive, flowing style.

Robin Reilley, M.S. GISP
Environmental Protection Specialist II