



May 15, 2023

Colorado Department of Natural Resources
Division of Reclamation, Mining and Safety
ATTN: Patrick Lennberg
1313 Sherman Street; Room 215
Denver Colorado 80203

RE: Adequacy Review No. 4; Technical Revision (TR-1) – Revise Mining and Reclamation Plans and Maps to Account for Acreage Release Areas in AR-1; Irwin/Thomas Mine, Permit No. M-2016-054

Dear Patrick ,

Please accept this letter on behalf of Holcim-WCR, Inc to acknowledge the requirements for this Technical Revision as outlined in your Adequacy Review No. 4 letter dated May 15, 2023. Our response follows your response as outlined in your letter as follows:

1. The Reclamation Cost Estimate provided by the Operator/Permittee of \$8,176,204.00 has been accepted by the Division. This represents an increase in the required Financial Warranty of \$5,428,293.00 from the currently held amount of \$2,747,911.00. While the Division will approve TR-1 the revision will not become final until the outstanding financial warranty amount has been accepted by the Division. Please acknowledge the increase in the required financial warranty for the site.

Applicant Response: Holcim-WCR, Inc. acknowledges the required increase in Financial Warranty and will forward the required documentation to the Division.

2. The table below is an accounting of the permit acres through TR-1:

Mining Area	Original Permit Acres	Acres Released through AR1	Agreed Upon Acreage for TR-1	Acres to be Released through AR2	Final Acreage Accounting for Permit after AR2
MA1	211.3	62.96	148.34	23.54	124.8
MA2	37.7	0	37.7	0	37.7
MA3	28.4	0	28.4	0	28.4
MA4	18.4	0	18.4	0	18.4
Total	295.8	62.96	232.84	23.54	209.3

During the TR-1 process it became apparent that AR-1 did not release the full number of acres as was originally intended, 62.96 acres versus 86.5 acres. Another Acreage Release Request will be submitted, AR-2, that will request release of remaining acres or 23.54 acres. Please acknowledge that the approval of TR-1 does approve release of any acres and the permitted acreage remains 232.84 acres.

Applicant Response: Holcim-WCR, Inc. acknowledges that the approval of TR-1 does NOT approve release of any acres and the permitted acreage remains 232.84 acres.

3. Please acknowledge the following. The Operator/Permittee has committed to submitting and gaining approval of a Technical Revision to update the reclamation cost estimate for the site prior to mining Cells 4 and 5. The revision is needed to account for the deficit in the revised bonding amount to account for the importation of material needed to backfill Cells 4 and 5.

Applicant Response: Holcim-WCR, Inc. is committed to submitting and gaining approval of a Technical Revision to update the reclamation cost estimate for the site prior to mining Cells 4 and 5.

4. Through the review process the Operator/Permittee acknowledged that an increase in the maximum number of disturbed acres be increased to match the number of acres that are in MA-1 after approval of AR-2 or 124.8 acres. The Division will approve the increase from 51.95 acres to 124.8 acres. Please note with the approval of TR-1 the permit acres remain 232.84, the affected land acres remain to be equal to the permit acres of 232.84, and the maximum number of disturbed acres at any one time is 124.8 acres, please acknowledge.

Applicant Response: Holcim-WCR, Inc. acknowledges that with the approval of TR-1 the permit acres remain 232.84, the affected land acres remain to be equal to the permit acres of 232.84, and the maximum number of disturbed acres at any one time is 124.8 acres.

Thank you for your assistance. Please contact me if you need additional information to complete your review.

Sincerely,

RESOURCE CONSERVATION PARTNERS, LLC



Barbara Brunk, Manager
Landscape Architect

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