

August 4, 2023

Sturges Karban Caldera Mineral Resources, LLC 593-110 Ave North Naples, FL 34108

Re: Camp Bird Tailings Exploration Project, Notice of Intent to Conduct Prospecting Operations Modification (MD-2), File No. P-2012-017, Adequacy Review

Dear Mr. Karban,

On July 20, 2023 the Division of Reclamation, Mining and Safety (Division) received your request for a modification for the above listed NOI. The Division is in the process of reviewing the above referenced application in order to ensure that it adequately satisfies the requirements of the Colorado Mined Land Reclamation Act (Act) and the associated Mineral Rules and Regulations of the Colorado Mined Land Reclamation Board for Hard Rock, Metal, and Designated Mining Operations (Rules). During review of the material submitted, the Division determined that the following issue(s) of concern shall be adequately addressed before a decision can be rendered.

Section III Project Description

Item number six, on Pg 6 of your application states there will be 8 exploration drill holes completed
to a depth of 100 feet. However, under section IV Operation and Reclamation Measures, item 4
states the holes will be completed to a depth of 500 feet. Additionally, the submitted project
overview only identifies 5 holes and includes the 3 groundwater monitoring wells which were
previously approved under Modification 1. Please provide a narrative clarifying the number of pads
to be constructed, holes to be drilled and their target depth.

Section IV, Operation and Reclamation Measures

2. In conjunction with item 1 of this review, item 4 of section IV identifies the holes will be temporarily capped, however the depth appears consistent with the water quality monitoring wells that were completed under Modification 1, suggesting that these new holes will interact with groundwater. Please provide a demonstration that the holes will not interact with groundwater and are appropriate for temporary capping, or provide details regarding the plugging and abandonment of the holes should the interact with groundwater.

Project Overview

3. As stated previously, the groundwater monitoring wells were previously reviewed and approved under modification 1. Please revise and submit a new project overview, as well as application package omitting the groundwater monitoring well information.

The current Decision Date for your application is Monday August 28, 2023. Please submit your responses to the above listed issues by Monday August 21, 2023 to allow the Division sufficient time to review. If additional time is required to address the items, please submit a Decision Due Date Extension Request to the Division



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prior to August 28, 2023. If your responses or a Decision Date Extension Request are not received by the current Decision Due Date, your application may be denied.

If you have any questions or concerns please do not hesitate to contact me. Direct contact can be made at the Division's Grand Junction Field Office, by phone at 303-866-3567 Ext. 8187 or by email at lucas.west@state.co.us.

Sincerely,

Lucas J. West

Environmental Protection Specialist

Cc: Travis Marshall, DRMS

Ec: Sturges Karban, Caldera Mineral Resources, LLC

Chris Skerik, Strategic Minerals