

**NARRATIVE
TECHNICAL REVISION
VARRA RESOURCES PROJECT 110
PERMIT NO. M-1984-036**

**Varra Companies, Inc.
February 5, 2024**

The purpose of this Technical Revision is to address the items that were identified in the Minerals Program Inspection Report, dated July 27, 2023, specifically the following, *“The operator needs to clarify the current boundary area with a Technical Revision to update applicable maps. These maps need to show the remaining 36.37 acres, which is the official permit area at this time.”*

There is a discrepancy in the DRMS records regarding the overall acreage of the mining boundary. DRMS records reference 120 acres as the total acreage. However, the original total mining boundary acreage was 102.56 acres, not 120 acres. This is consistent with the Weld County Assessor’s records. Please see the attached Weld County Assessor’s Property Report, which specifies total acreage of 102.568 acres and includes a map outlining the property, based on the legal description. Additionally, the maps included within Annual Reports from the years 2015, 2017 and 2018 all show 102.56 acres as the mining boundary.

In 2018, when 83.63 acres were released by the DRMS, Peter Hays referenced a remaining acreage of 36.37 acres, which would have increased the original acreage to 120 acres. This was incorrect. The remaining acres within the current mining boundary should have been 18.93 acres.

The updated 2024 Exhibit F, Reclamation Map, identifies the Current Permit Boundary, consisting of the remaining areas pending release, as dark green strips and their acreage totals 18.93 acres.

Please see Tables below:

SUMMARY OF TOTAL MINING BOUNDARY ACREAGE		
	Acres	Notes
Mining Boundary	102.56 ±	Original Mining Area
Areas Released in 2018	83.63±	Total Areas Released
TOTAL ACRES REMAINING TO BE RELEASED	18.93±	Current Permit Boundary Acreage

CURRENT PERMIT BOUNDARY			
CURRENT PERMIT BOUNDARY	MAP CODE	ACRES	DESCRIPTION/NOTES
Area 3C - Vegetative Berm	#3C	4.00 ±	Resoiled – Seeding Pending
Area 2E - Roadside Vegetation	E	1.00 ±	Established – minimally affected area
Area 2F - Upper Inside Slope	F	2.73 ±	Established – need more time and weed control
Area 2G – Lower Inside slope	G	1.20 ±	Limited Vegetation – affected by fluctuating water levels
Area 4E - Roadside Vegetation (outer basin slopes)	H/K	2.40 ±	Established – minimally affected area
Area 4F - Upper Inside Slope	I	4.30 ±	Established – need more time and weed control
Area 4G – Lower Inside Slope	J	3.30 ±	Limited Vegetation – affected by fluctuating water levels
Total Acreage Pending Release		18.93±	

AREAS PREVIOUSLY RELEASED			
AREAS RELEASED (2018)	MAP CODE	ACRES	DESCRIPTION/NOTES
Area 1 - Scale house and Yard	#1	3.71±	
Area 2 - Basin Area Reservoir	#2	16.50±	Basin Area = 20.83± Acres
Area 3A – Agricultural Stockpile and Storage Area	#3A	20.44±	
Area 3B - Recycling Plant and Yard	#3B	10.00±	
Area D - River Access Road	D	2.30±	Access f.VC I/SV SD/O&G
Area 4 – Basin Area Reservoir	#4	24.60±	Basin Area = 28.38± Acres
Unspecified Areas not Pending	Other Access, Unaffected, River & Riverside Areas		
TOTAL ACRES PREVIOUSLY RELEASED (2018)		83.63±	