



COLORADO
Division of Reclamation,
Mining and Safety
Department of Natural Resources

Mr. Graham Roberts
Trapper Mining Inc.
P.O. Box 187
Craig, CO 81626

12 December 2023

Re: Trapper Mine (Permit No. C1981-010)
Preliminary Adequacy SL24

Dear Mr. Roberts:

In developing the reduction in liability for the Trapper Mine SL24 Phase II permitting action, DRMS finds that the Phase I acreage available for release is 3.6 acres less than the acreage available when the requested 298.3 acres are deducted from current Phase I acreage. This suggests that TMI's request is greater than the actual acreage releasable. Having researched past permitting actions and the associated liability calculations DRMS has not identified where the discrepancy may reside. DRMS suggests that there may be a double counting of redisturbed acres. DRMS also understands that tracking acreage has inherent error and finding acreages is a time consuming exercise.

1. Please, if possible, indicate where the 3.6 acres of Phase I acreage may have been miscounted or consider reducing the acreage in the Phase II bond release request.

The decision date for the SL24 Permitting action is 31 December 2023. If an extension may be needed please send DRMS a request for extending the decision date.

Sincerely

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