



STATE OF
COLORADO

Reilley - DNR, Robin <robin.reilley@state.co.us>

(TRAPPER)SL-24 Bond Release Adequacy Response

1 message

Graham C. Roberts <graham.roberts@trappermine.com>

Thu, Feb 8, 2024 at 7:07 PM

To: "Reilley - DNR, Robin" <robin.reilley@state.co.us>

Cc: Connie Bauers <connie.bauers@trappermine.com>

Robin,

Please see the attached adequacy response concerning Phase II Bond Release Application SL-24.

Please let me know if you have any questions concerning this correspondence, thanks,

Graham Roberts

Environmental Supervisor

Trapper Mining Inc.


PO Box 187

Craig, CO 81626

Office-970-826-6143

Cell-970-756-8950



 **SL-24 Adequacy Review.pdf**
431K



TRAPPER MINING INC.

P.O. Box 187

Craig, Colorado 81626

(970) 824-4401

February 8, 2024

Ms. Robin Reilley
Environmental Protection Specialist
Colorado Division of Reclamation, Mining and Safety
1313 Sherman Street, Room 215
Denver, CO 80203

**Re: Trapper Mining Inc., Permit No. C-1981-010
Phase II Bond Release Application SL-24
Adequacy Comments**

The below adequacy, comments were received from the Division on December 12, 2023:

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.*

After careful review of all past bond release acreages and re-disturbance to these acreages, it appears an error has been found that will rectify the discrepancy of the above 3.6 acres. The issue was found to include an excess of Phase I Bond release re-disturbance acres (3.1 ac) and a topsoil pile area that did not receive appropriate Phase I bond release, (1.6 ac) but has since received Phase II and III release. These errors more than account for the lack of suitable acres present for the SL-24 bond release. It would be preferred if this discrepancy perfectly rectified the issue, but it appears to show a slight excess of acres in the LOM numbers. The only assumption at this point is this inaccuracy is associated with rounding of the acres on the site to the nearest tenth, which has inherently induced some error to the LOM acreages. The below explanation details the effected parcel and the acreage accounting errors realized over the past several years.

Parcel FB-07 is located near the middle of the former F-Pit area. The parcel was regraded, topsoiled and seeded in the fall of 2007. Three topsoil piles were located along the edges of this parcel to be used later for future reclamation parcels in the area. The parcel was initially delineated in the 2007 ARR at 38.8 acres. It was subsequently included in the SL-8 Phase I bond release application in 2008 at the same acreage as shown in Figure 1, Exhibit A. In the 2010 ARR this same parcel was presented with a new acreage of 43.4 acres and is shown as Exhibit B on Figure 1. My notes indicate that 4.6 acres of topsoil piles were added to the parcel at that time. One pile at the southern edge, (F3-07) was utilized and depleted that summer and the footprint was reclaimed. The other two piles, (F2-06 and F2-07) remained

until 2012 when they were utilized for reclamation. I do not recall the entire reasoning for including the outlines of these piles in the parcel.

During the summer of 2012 piles F2-06 and F2-07 were utilized from the parcel. The parcel was also re-disturbed to build a topsoil haulroad for retrieval of two large topsoil piles located west of the F-Pit reclaimed area for laydown on the eastern portion of the former pit area. During this process, re-disturbance to Phase I acres was erroneously calculated at 5.1 acres. This included the footprints of the two previously noted piles and the road corridor through the middle portion of the parcel. The parcel is shown in this configuration with re-disturbance noted on Figure 1, Exhibits C and D. For the 2012 ARR the parcel was given a new updated acreage of 38.3 acres. The 5.1 acres of Phase I re-disturbance accounted for here has been carried in the annual report totals since.

Subsequently the parcel underwent further bond release approvals for Phase II (SL-16) and Phase III (SL-20) at the new revised acreage of 38.3 acres. The former footprint of topsoil pile F3-07 received approval for Phase II and III bond release in these actions. It, however, did not receive Phase I bond release. This is shown on Figure 1, Exhibit C. The pile was 1.6 acres.

The re-disturbance in 2012 did not affect the Phase II and III acreages as it occurred before those bond releases were submitted. The acres of the two remaining piles and the topsoil haulroad were accounted for in 2012 as a separate parcel and have also been bond released at this time. The only actual re-disturbance to Phase I bond release acres occurred during the haulroad construction and accounts for 2.0 acres. This area is shown on Figure 1, Exhibit D.

Trapper proposes the acres associated with the former topsoil pile site of F3-07, at 1.6 acres, be added to the LOM Phase I bond release total. Trapper also proposes a reduction of 3.1 acres to the LOM re-disturbance acres for Phase I bond release. These corrections will account for the discrepancy noted by the Division and provide enough acres to grant approval of the SL-24 bond release application. As of the end of 2022, the revised LOM bond release acres with re-disturbance removed would be as follows:

Bond Release Phase	Current LOM Acres	Proposed Revised LOM Acres	Proposed Revised Releasable Acres
Phase I	4527.6	4532.3	---
Phase II	4232.9	4232.9	299.4
Phase III	3805.5	3805.5	427.4

Please contact us with any questions, comments or concerns.

Sincerely,



Graham Roberts
Environmental Supervisor
Trapper Mining Inc.

Figure 1

SL-24 Acreage Discrepancy

Exhibit A

Parcel as
presented in SL-8
PHI Bond Release
38.8 acres

Exhibit B

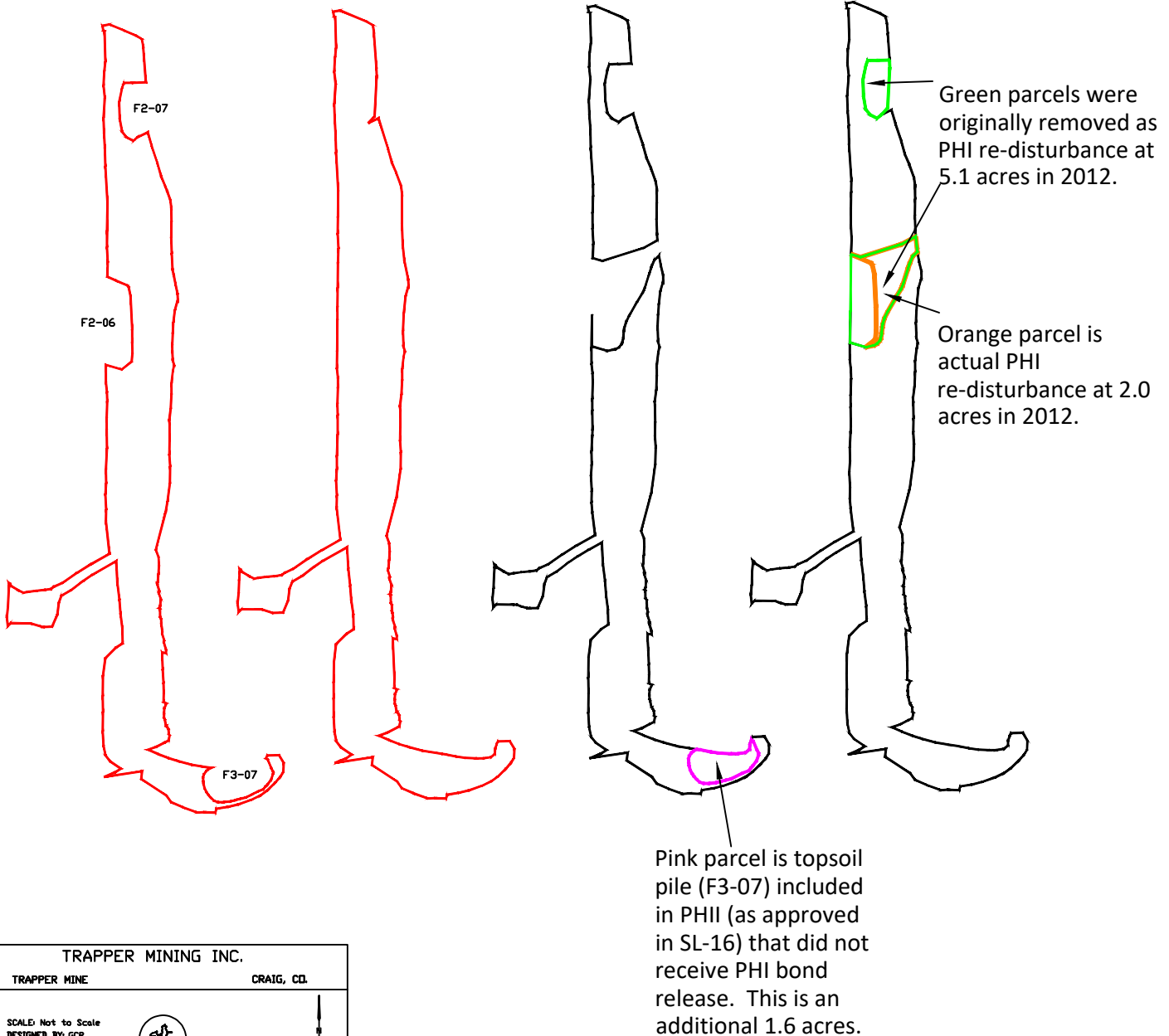
Parcel as
presented in 2010
ARR with piles
added, 43.4 acres,
this was in error.

Exhibit C

Parcel as
presented in
SL-16 PHII Bond
Release
38.3 acres

Exhibit D

Parcel as
presented in
SL-20 PHIII Bond
Release
38.3 acres.
Redisturbance
areas shown



TRAPPER MINING INC.

TRAPPER MINE

CRAIG, CO.

SCALE: Not to Scale
DESIGNED BY: GCR
DRAWN BY: GCR
DATE: 1/31/24

