



## Department of Energy

Washington, DC 20585

February 13, 2024

Via email: [dlcoram@msn.com](mailto:dlcoram@msn.com)

Mr. Don Coram Sr., President  
Gold Eagle Mining Inc.  
PO Box 3007  
Montrose, CO 80401

Subject: Gold Eagle Mining Inc.  
Uranium Mining Leases DE-RO01-19LM70240 and DE-RO01-19LM70253  
Response to Reclamation Plans and Environmental Checklist

Dear Mr. Coram:

The U.S. Department of Energy Office of Legacy Management (LM) is issuing this letter and enclosure regarding Gold Eagle Mining Inc.'s (GEMI's) revised reclamation plans and *Uranium Leasing Program Lessee Environmental Checklist* (LM-Form-4-20-22.0) (Environmental Checklist) for those mines listed below on lease tracts that are leased to you by LM under the Uranium Leasing Program (ULP) lease agreements. These mines are permitted by the Colorado Division of Reclamation, Mining, and Safety (DRMS) and are on the following ULP lease tracts:

- C-SR-13, Burro Tunnel mine (DRMS ID: M1977-297)
- C-SR-13, New Ellison mine (DRMS ID: M1978-342)
- C-JD-5, JD-5 mine (DRMS ID: M1977-248)

LM and the Legacy Management Support contractor staff have performed a preliminary review of the Environmental Checklist and revised reclamation plans you submitted on January 18, 2024, and determined them to be *incomplete*. To facilitate the necessary revisions of the Environmental Checklist and reclamation plans, please see the enclosed review comments regarding these documents. These comments are to ensure adequate environmental review and subsequent compliance measures are implemented for the proposed actions.

Please review and provide responses, clarification, or information, as appropriate, to each comment in the review document. If you have any questions, LM would be happy to meet with GEMI and your consulting staff to discuss the information to be included in the Environmental Checklist and reclamation plans.

Please contact me at (970) 640-6088 or [Ian.Shafer@lm.doe.gov](mailto:Ian.Shafer@lm.doe.gov) if you have any questions.

Sincerely,

IAN  
SHAFFER

Ian Shafer  
Uranium Leasing Program Project Manager

Digitally signed by  
IAN SHAFFER  
Date: 2024.02.13  
12:10:38 -07'00'

Enclosure

cc w/enclosure via email:

Stephanie Carter, BLM

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## Preliminary Review Notes

### GEMI Reclamation Plans and Environmental Checklist

#### Checklist - General Notes

1. Complete one checklist per lease tract; one for JD-5 and one for SR-13.
2. Checklist should be submitted in word document format until review is complete and ready for approval signatures.
3. Lessee should not sign and date the checklist until the proposed scope of the checklist has been agreed upon.
4. Electronic format for all submittals is encouraged.
5. Both the Bureau of Land Management (BLM) Colorado State Office and the Colorado Division of Reclamation, Mining, and Safety (CDRMS) have opted to postpone their reviews until these initial comments are addressed.

#### Section III. Summary of Project

Checklist is **incomplete**. See comments below.

5. No reference to the PEIS or Lease Agreement Appendix C measures (compliance, mitigation, or Best Management Practices [BMPs]) to minimize environmental impacts ([link – under environmental documents](#)).
  - 5.1. Per the *ULP Lessee Environmental Checklist Instructions* (LM-SOP-4-20-6.0)
    - 5.1.1. Utilize references included in the 2014 ULP PEIS (specifically Table 4.6-1) to identify relevant resources that have the potential to be impacted by the proposed action and incorporate the resources into the checklist accordingly.
6. No reference to needing a site-specific mitigation action plan ([link – under environmental documents](#)).
  - 6.1. Per checklist instructions:
    - 6.1.1. Generate a list of site-specific mitigation measures that would be applicable to the proposed action and include it as an attachment to the checklist. These mitigation measures will be incorporated from those identified as part of ULP PEIS and Mitigation Action Plan.
7. No cultural resource surveys included.
  - 7.1. Per the Lease Agreement, Appendix C, Section (g); If the lessee desires to have mine related features assessed for their Cultural Significance, DOE must be provided with a Class 3 Cultural Resources survey completed by a qualified consultant acceptable to DOE. Additionally, if the mine related features are determined to be Culturally Significant, the lessee will need to prepare a Mitigation Action Plan to address those Resources as is outlined in the Lease Agreement.
  - 7.2. The BLM Uncompahgre Field Office has located a cultural survey from 1995 (5MN.4483) that is now out of date, therefore, a new survey is required.
8. No reference to wildlife surveys (sensitive species, habitats, raptors, migratory bird nesting, 0.25 miles from Dolores River – bighorn corridor and other wildlife) included. Refer to the Lease Agreement, Appendix C and 2014 ULP PEIS Table 4.6-1.
9. No permitting information included.
  - 9.1. Current site stormwater permits or new proposed permits must be referenced.

9.1.1. Include copies of stormwater management plans

10. Per the checklist instructions:

- 10.1. Attach a legible location map, site plan, or other relevant figures, as applicable (drawn to a scale no smaller than appropriate to clearly show all elements that are to be delineated in the plan). At a minimum the map should include a scale, north arrow, relevant site features (e.g., mine structures), and environmental resources (e.g., nearby wetlands and/or waterbodies).
- 10.2. Reference and submit, where applicable, supporting information such as (but not limited to) site survey reports, Geographic Information System (GIS) data, engineering plans, and correspondence with other federal, state, and local agencies.

### Reclamation Plan – General Notes

11. No response to DOE's May 11<sup>th</sup>, 2022, letter rejecting the 2022 reclamation plans. Questions in letter have yet to be addressed.

### Burro Mine M-1979-297

12. Please indicate on a map of appropriate scale where the chain-link fence will be installed across the ramp. Please reference an appropriate cultural resource survey.
13. Please address the water levels in accordance with DRMS Rule 3.1.6

### Ellison Mine M-1978-342

14. Ripping of the waste rock pile
  - 14.1. Please add detail to how the slopes will be ripped. Will the ripping occur on contour (perpendicular to the slope) or other?
  - 14.2. "Mechanically rip areas that need effective growth media preparation", does this refer to only the slopes of the waste rock pile that will be reduced to 3:1 or the entire New Ellison disturbance?
  - 14.3. Topsoil must be applied before the slopes may be ripped.
15. Please include in the Reclamation Plan a description of the proposed post-reclamation stormwater control berms outlined in Technical Revision 04 dated 12/9/2013.
16. Please include in the Reclamation Plan the proposed seed mix. Refer to the Lease Agreement, Appendix C and 2014 ULP PEIS Table 4.6-1.
17. Please include in the Reclamation Plan a plan for securing the adit against unauthorized entry as is stipulated in the DOE letters responding the Technical Revision 04.
18. Please include in the Reclamation Plan the proposed disposition of the structures on site include the snow shed and portal gate, wood-cribbed earthen equipment ramp, Quonset shop building, and power infrastructure as is stipulated in the DOE letters responding the Technical Revision 04.
19. Please include in the Reclamation Plan the disposition of the mineralized material stockpiled on the surface as is stipulated in the DOE letters responding the Technical Revision 04.

### JD-5 M-1977-248

20. See previous comment about cultural resource survey.
21. No reference to Technical Revision 02 (TR-02) that has been reviewed by DRMS and shared with DOE. If the lessee wishes to maintain the hoist house and connected compressor house along with all the features within for their cultural significance, in addition to the cultural resource survey noted in the previous bullet, the lessee must consult with DRMS concerning the need for a Technical Revision. The Technical Revision 02 dated 12/9/2013 lists these feature as being removed during reclamation.
22. Ore bins
  - 22.1. Please describe in detail how the ore bins will be demolished.
  - 22.2. Is there additional wooden debris that will be disposed of besides that found in the ore bins?
  - 22.3. Where will the wood debris be relocated to?
  - 22.4. Will the steel be relocated or buried in place?
  - 22.5. What is this final slope for the material that will cover the ore bins.
  - 22.6. As outlined in the Lease Agreement, Appendix C, Section (I): please include a plan to ensure the ore-storage areas have been covered with sufficient material.