



TRAPPER MINING INC.

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February 28, 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

Technical Revision TR-135: L-Pit (K Knob) Extension and East J-Pit Dragline cuts

Dear Ms. Reilley:

This technical revision is being submitted to add additional mining in the southeast portion of the L-Pit, commonly referred to as K Knob. This portion of the pit will be extended to the north. Additionally all seams in this portion of the pit will be recovered to the Q seam. Additionally revised materials are included for a proposed J-East pit that will consist of five surface dragline cuts in the area immediately south of the I/J overburden stockpile. This pit will recover G seam, just as is being conducted in the current J-Pit west of this pit location. The final highwall may be highwall mined depending on thickness and quality of the coal seam.

With the proposed changes to L-Pit and new East J-Pit the bond amount must be increased to account for the additional acres of stripping/reclamation and backfilling of these additional cuts. Trapper has calculated total additional bond for this action at \$6,502,846.

New additional acres of disturbance requested is 50.8 acres and 49.3 acres additional to the affected acres. The difference is due to some areas of new disturbance already being accounted for as affected as they overlay proposed highwall mining panels.

Production goals for the life of mine have once again changed as of late 2023. The future pit development for C-Pit has been halted and is not planned to proceed. Proposed mining and future activities depicted on the permit maps for this pit will remain for planning purposes but will not be developed at this time. Approximately 173 acres of the originally proposed 189 acres (PR-11) had topsoil removed during the summer of 2023 for pit development. This area will be reclaimed in the future. With this change to the mine plan, Trapper requests that task N03 of the PR-11 CIRCES bond calculation be removed from the total liability for the site. Task N03; Backfill and Grading C-Pit, carries a cost of \$6,225,540 to account for the backfill of C-Pit. This cost is no longer applicable to the worst case bonding scenario for the mine at this time. If development of C-Pit must be occur, Trapper will request this liability be re-instated to the bond.

Further review of the PR-11 CIRCES bond calculation also revealed that task 092 and N13 appear to be duplicative in nature, and only one should remain in the estimate. Task 092 appears to have a small error in the cubic yards used in the calculation, task N13 utilized the cubic yards of topsoil as supplied in the Appendix A bond estimate as presented by Trapper (APP A, Table A-9.1 and Table A-10.2.) Topsoil costs will need to be retained in the estimate since the majority of the area was stripped, however, task 092 should be removed to further reduce the liability on the site by \$511,131.

The following revised permit pages are enclosed:

- Page 1-15 to 1-15a, revised neighboring land owners due to recent ownership changes.
- Page(s) 3-15a to 3-15d, revised pit discussion
- Page(s) 3-28b to 3-28c (Tables 3.4-2, 3.4-3), revised for new ownership and community contacts.
- Page(s) 3-44, revised pit discussion

The following revised appendix materials are enclosed:

- Appendix A, Appendix A TR-135 Addendum for additional topsoiling, seeding and backfill and regrading costs in L and East J-Pit.

The following revised maps are enclosed:

- M1, Sheet 1, Updated property ownership
- M4, Sheets 1 and 3; Updated pit boundaries
- M4A, Sheets 1 and 3; Updated pit boundaries
- M6, Sheets 1 and 3; Updated PMT/stripping limit for WCB year for J and L-Pit.
- M10A, Sheets 1 and 3; Updated stripping limit for J and L-Pit.
- M10B, Sheets 1 and 3; Updated stripping limit for J and L-Pit.
- M12, Sheets 1 and 3; Updated PMT for J and L-Pit.
- M13, Sheets 1 and 3; Updated as built power lines, constructed and or removed summer 2023.

Please contact us with any questions, comments or concerns.

Sincerely,



Graham Roberts
Environmental Supervisor
Trapper Mining Inc.

c Revisions binder
File 109.2.3.4
Foster Beckett, BLM