



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

April 25, 2024

Eric Detmer  
Climax Molybdenum Company  
Highway 91 - Fremont Pass  
Climax, CO 80429

**RE: Climax Mine, File No. M-1977-493 , Technical Revision (TR-37) Adequacy Review**

The Division of Reclamation, Mining and Safety (Division) is in the process of reviewing the above referenced Technical Revision Application in order to ensure that it adequately satisfies the requirements of the Colorado Mined Land Reclamation Act (Act) and the associated Mineral Rules and Regulations of the Colorado Mined Land Reclamation Board for Hard Rock, Metal, and Designated Mining Operations (Rules). During review of the material submitted, the Division determined that the following issue(s) of concern shall be adequately addressed before a decision can be rendered.

Exhibit E

1. Per Rule 6.4.5(2)(a) please provide an estimated amount of acreage accorded to each type of reclamation (rangeland, commercial/industrial, etc.).
2. Per Rule 6.4.5(2)(f)(ii) please provide an estimated mixture and quantities of fertilization to be applied. The Division acknowledges that this information may be location specific and dependent upon soil sampling at a later date. However, type and rate information is necessary for bonding purposes. Please also include this information under Exhibit L.
3. Section E-3.4 references 4 Dam but this feature is not found on any figures, please clarify.
4. The LBS PLS/Acre listed in Table E-2, E-4, and E-6 do not sum to the totals and subtotals listed in the table - please clarify.
5. Are the alternate species listed associated with any one species in particular or can they be substituted for any species in the mix? Do the alternate species have specific LBS PLS/Acre or do they have the same LBS PLS/Acre as the species they are replacing?



6. Concrete bulkheads are mentioned within the bonding materials for the Tenmile Tunnel, No. 3 Gallery, Stroke Portal and Phillipson Portal. However closure of these items are not discussed within the Reclamation Plan. Please clearly illustrate how these features will be addressed come final reclamation.

#### Exhibit F

7. Per Rule 6.4.6(b) please portray the proposed final land use for each portion of the affected lands.

#### Exhibit G

8. Per Rule 6.4.7(3) please include flow rates in addition to annual volumes for development, mining, and reclamation phases of the project.

#### Exhibit L

9. Volumes of material have been provided for civil activities however it is not specified if these volumes are bank, compact or loose. Material swell and therefore total volume may vary throughout the process. Please clarify the volume units for each task type. And provide the corresponding material consistency type related to the swell factor.
10. Are the units presented for haul distances linear feet?
11. Underground Mine Openings - 2 ft thick concrete bulkheads are mentioned for the Tenmile Tunnel, No. 3 Gallery, Stroke Portal and Phillipson Portal. Are these hydrologic bulk heads or just a concrete closure of the opening?
12. Underground Mine Openings - Please provide the overall dimensions of the opening (height and width) where the bulkhead will be installed.
13. Disposal of Reagents - The Division cannot assume that the mill would operate until all mixed chemicals as Nokes Reagent in solution would be consumed by the milling process. Please provide an inventory of Nokes by the typical volume(s) located on site. The Division will also account for those chemicals mentioned in TR-28 Table T-A-1. Please also designate the chemical state (solid or liquid) and if they are hazardous vs non-hazardous for disposal.

Please submit your response(s) to the above listed issue(s) by **Friday May 17, 2024**, in order to allow the Division sufficient time for technical review. The current decision due date is **July 29, 2024**. If any adequacy issues remain by the decision due date the Division may deny your request.

4/25/2024

The Division will continue to review your Technical Revision and will contact you if additional information is needed.

If you require additional information, or have questions or concerns, please feel free to contact me.

Sincerely,

A handwritten signature in blue ink that reads "Amy Yeldell". The signature is written in a cursive, flowing style.

**Amy Yeldell**

Environmental Protection Specialist

Ec:

Travis Marshall, Senior EPS, DRMS

Dustin Czapla, DRMS

Todd Jesse, DRMS

Alex Ungers, Climax