

<u>Climax Mine</u> Highway 91 - Fremont Pass Climax, CO 80429 Phone (719) 486-7718 Fax (719) 486-2251

May 17, 2024

Mr. Dustin Czapla Environmental Protection Specialist Division of Reclamation, Mining and Safety Department of Natural Resources 1001 E 62nd Ave., Room 215 Denver, CO 80216

RE: Climax Mine, Permit No. M-1977-493, Technical Revision (TR)-38 – Molybdenum Removal Water Treatment Plant (MRWTP) Sludge Cell Design

Dear Mr. Czapla,

The Climax Molybdenum Company, Climax Mine plans to construct the Molybdenum Removal Water Treatment Plant (MRWTP) sludge cell in summer 2024 to store sludge generated from the new MRWTP addition to our existing Property Discharge Water Treatment Plant (PDWTP). The MRWTP construction was approved by DRMS as Technical Revision (TR-34) with comment that construction of the sludge cell will require an additional TR. The MRWTP stage of water treatment is on schedule to be commissioned in the first quarter of 2025 so the sludge cell must be completed in 2024 (before winter season) to be operational for deposition of MRWTP sludge, hauled from MRWTP via cement mixing truck. MRWTP sludge cell will not be identified as an Environmental Protection Facility (EPF), as it is fully contained within the existing EPF of Mayflower TSF and 5 Dam. This aligns with existing sludge cells (SDP and PDWTP) not being categorized as individual EPFs since they are fully contained within existing EPFs onsite, Tenmile TSF/3 Dam and Mayflower TSF/5 Dam respectively. Rule 7.3 only pertains to EPFs requiring a request to obtain Division approval to initial construction of the facility, however Climax clarified in TR-34 submittal that construction of the MRWTP sludge cell would require an additional TR submittal.

Attachments include the IFC Drawings and map of MRWTP Sludge Cell Location, and the \$1,060.00 fee applicable to a 112d operation. We appreciate your review of the TR and look forward to your approval. Please contact me at 719-486-7717 if you need additional information.

Sincerely,

Any Une

Alex Ungers Chief Environmental Scientist

attachments

CLIMAX MINE MOLYBDENUM REMOVAL WATER TREATMENT PLANT MOLY SLUDGE DISPOSAL AREA



	NO. DA	TE MADI	DE BY CKD	D. BY	REMARKS	"THIS DRAWING TOGETHER WITH ANY AND ALL	S	DRAWING N). REFEF	RENCE			
Γ	A 08/2	22 SA	AA TE	ГЕМ	ISSUED FOR CONSTRUCTION	ADDITIONS, CORRECTIONS, CHANGES AND	Ő	ÿ 🗌			🕞 Climax	Molyhdenum	MOLYBDENL
S [ALTERATIONS THEREOF IS THE PROPERTY OF	2					Worybacham	
⊡⊺						FURNISHED ON THE EXPRESS CONDITION THAT	빙	н —			A Freeport-McN	MoRan Company	N
S						IT SHALL NOT BE REPRODUCED, COPIED, LENT,	Ĭž	ži – – – – – – – – – – – – – – – – – – –					
Ψŀ						NOR USED FOR ANY OTHER PURPOSE THAN FOR	Ř				W. W. WHEELER	3700 S. INCA STREET	
۳ ł						WHICH IT IS SPECIFICALLY FURNISHED WITHOUT	l H				& ASSOCIATES, INC	303-761-4130	
F						MOLYBORNUM COMPANY."	Ř				Water Resources Engineers	FAX 303-761-2802	
_													

DRAWING INDEX						
RAWING NO.	DRAWING TITLE					
GENERAL						
G1	COVER SHEET - PROJECT LOCATION MAP					
G2	GENERAL ARRANGEMENT					
CIVIL						
C1	MOLY BERM PHASE I - SITE PLAN					
C2	MOLY BERM PHASE II - SITE PLAN					
C3	MOLY BERM - PROFILE AND SECTION					
C4	LOGS OF EXPLORATORY TEST PITS					

JM REMOVAL WATER TREATMENT PLANT	Climax Molybdenum Climax Mine Climax, CO					
MOLY SLUDGE DISPOSAL AREA	SAA	01/22	PROJECT NUMBER 1051.46.03			
COVER SHEET	CHECKED BY SMM	01/22	DRAWING NO.			
	ACCEPTED BY		G1			



	Climax, CO						
MOLY SLUDGE DISPOSAL AREA	SAA	01/22	PROJECT NUMBER 1051.46.03				
GENERAL ARRANGEMENT	CHECKED BY SMM	01/22	DRAWING NO.				
PLAN VIEW	ACCEPTED BY		G2				







OTES.									
1.	PHASE II EXCAVATION BOTTOM ELEVATION MAY BE								
	IMPACTED BY PREVIOUSLY STORED SLUDGE.								

JM REMOVAL WATER TREATMENT PLANT	Climax Molybdenum Climax Mine Climax, CO					
MOLY SLUDGE DISPOSAL AREA	SAA	01/22	PROJECT NUMBER 1051.46.03			
MOLY BERM	CHECKED BY SMM	01/22	DRAWING NO.			
PROFILE AND SECTION	ACCEPTED BY		C3			





Climax 🔁	Molybdenum	MOLYBDENUM REMOVAL WATER TREATMENT PLANT	Climax	Climax Molybdenum Climax Mine Climax, CO			
A Freeport-McMoRan Company		MOLY SLUDGE DISPOSAL AREA	MADE BY SAA	01/22	PROJECT NUMBER 1051.46.03		
W. W. WHEELER	3700 S. INCA STREET ENGLEWOOD, CO 80110-3405	LOGS OF EXPLORATORY TEST PITS	CHECKED BY SMM	01/22	DRAWING NO.		
Water Resources Engineers	303-761-4130 FAX 303-761-2802		ACCEPTED BY		C4 🔬		

NOTES

- USED.

- 6. LABORATORY TEST RESULTS:

1. THE EXPLORATORY PITS WERE EXCAVATED WITH A HITACHI 200 EXCAVATOR BETWEEN NOVEMBER 14 AND 15, 2012. THE TEST PITS WERE LOGGED BY KUMAR AND ASSOCIATES AT THE TIME OF EXCAVATION.

2. THE LOCATIONS AND ELEVATIONS OF THE EXPLORATORY PITS WERE MEASURED BY INSTRUMENT SURVEY PROVIDED BY W.W. WHEELER.

3. THE EXPLORATORY PIT LOCATIONS AND ELEVATIONS SHOULD BE CONSIDERED ACCURATE ONLY TO THE DEGREE IMPLIED BY THE METHOD

4. THE LINES BETWEEN MATERIALS SHOWN ON THE EXPLORATORY PIT LOGS REPRESENT THE APPROXIMATE BOUNDARIES BETWEEN MATERIAL TYPES AND THE TRANSITIONS MAY BE GRADUAL.

5. GROUND WATER LEVELS SHOWN ON THE LOGS WERE MEASURED AT THE TIME AND UNDER CONDITIONS INDICATED. FLUCTUATIONS IN THE WATER LEVEL MAY OCCUR WITH TIME.

WC = WATER CONTENT (%) (ASTM D 2216); DD = DRY DENSITY (pcf) (ASTM D 2216); +4 = PERCENTAGE RETAINED ON NO. 4 SIEVE (ASTM D 422); -200 = PERCENTAGE PASSING NO. 200 SIEVE (ASTM D 1140); LL = LIQUID LIMIT (ASTM D 4318); PI = PLASTICITY INDEX (ASTM D 4318); NP = NON-PLASTIC (ASTM D 4318); NV = NO LIQUID LIMIT VALUE (ASTM D 4318).

TEST PIT LOGS FROM KUMAR AND ASSOCIATES (2012).





MRWTP Sludge Cell Location



