



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

July 9, 2024

Tim Strack
American Gypsum Company LLC
740 HWY 6
Gypsum, CO 81637

RE: Eagle-Gypsum Mine, File No. M-1984-041 , Technical Revision (TR-12) Adequacy Review #2

Dear Mr. Strack:

On June 24, 2024, the Division of Reclamation, Mining and Safety (Division) filed your Technical Revision request TR-12 for the Eagle-Gypsum Mine, Permit No. **M-1984-041**. Adequacy Review #1 regarding confidentiality was sent on June 25, 2024. To date the Division has not received a response. During the review of the material submitted, the Division determined that the following issue(s) of concern need to be adequately addressed before the Technical Revision can be considered for approval. In addition to the items raised in Adequacy Review #1, please address the following:

1. A spreadsheet "Tabulated Mine Quantities.xlsx." was included with the TR-12 materials. Three material types were broken out; storage (final placement), Waste (cut material to be relocated into storage) and gypsum (taken off site). The Division is interpreting that for bonding purposes Storage and Waste will be utilized as backfill material. However, no volumes for growth medium (topsoil) were provided.
 - a. Please revise the spreadsheet to include topsoil volumes by location.
2. Please update section 2.13 to clarify the material consistency of "intra burden" or "waste". Previous revisions have classified the overburden as Shalely Sandstone or dry clay. Specify the material consistency to be utilized for backfill material.
3. Please provide a map which labels the various areas broken out on the "Tabulated Mine Quantities.xlsx." Include on the map all referenced storage locations.
4. Please provide the "worst case scenario" maximum highwall length, height, and slope to be backfilled at any time during the mine plan.
5. For the backfill and topsoil (or "growth medium") material specify the volume, storage location, the average haul distance and haul grade for transporting the material, by area and material type.
6. Section 3.6 of the Reclamation Plan acknowledges that the site is topsoil deficient and that overburden will be blended to 'stretch' the volume. Has any soil testing of this blended material occurred to date? If so, what were the results?



7. A cost for riprap was provided. Is this the cost to purchase the material only or does this include delivery to the site?
8. Volumetrics were not provided for all currently disturbed areas. Please clearly provide information for the all-road segments, shop and office facilities, sediment control and access roads, stockpiles, and loadout areas in addition to the open pits.
9. Section 2.2 of the mining plan states, "the maximum footprint (of the upper pit) would be excavated to a pit floor elevation..." Per Rule 6.4.4(d) please state the size of area(s) to be worked at any one time. Provide the maximum acreages to be opened at any time, broken out by pit.
 - a. Table 2.1 Estimated Schedule of Operations breaks the mine into several phases. Per Rule 6.4.4(e)(ii), please include a description of the size of each phase and clarify whether the disturbance associated with each phase should be added to the previous phase. (If you feel that this information is better presented in the Tabulated Mine Quantities spreadsheet, please refer to it in the text or as a footnote to Table 2.1).
 - b. Please confirm that Table 2.1 does not include any mining activity that has not already been permitted.
 - c. Clarify what phases need to exist through life of mine but should be included in the worst-case scenario and will require reclamation.
10. Please include an inventoried list of all culverts (material type, length, and diameter) which were installed and will be removed as part of reclaiming haul roads.
 - a. Indicate if they will be excavated during recontouring of the roads or if additional excavation will be required for removal and if so, how much.
11. Will any mulch be applied to reclaimed areas?
12. Removal of buildings/structures is not explicitly discussed within the Reclamation Plan. Will any man-made structures remain post mining? Will all debris be transported off site for disposal? Please specify this within the narrative portion of the Reclamation Plan.
13. Within the reclamation plan installation of "rock vortex weirs or rip-rap" is mentioned. Is this referring to the surface water channel that is to be constructed through the regraded 6900 access road? Or are additional rock features necessary? If so, please provide the details of these features, including but not limited to dimensions, volume of import or excavated materials, anticipated quantity, and location(s).
14. Please provide the height of all structures to be removed.
15. For items in which the foundation type is cinder blocks please clarify if just the perimeter of the structure that sits on the blocks like a stem wall/footer or if a temporary pad has been constructed.
16. Please provide the construction details of the mine access gate which shall be removed upon final reclamation.
17. Section 3.10 (Reclamation Plan AM-4) mentions
 - a. Slope monitoring for a period of 5 years. What is the annual cost anticipated for this activity and the number of hours annually?

- b. Reclamation (vegetation) monitoring for a period of 3 years. What is the annual cost anticipated for this activity and the number of hours annually?
 - c. Stormwater monitoring for a period of 5 years. What is the annual cost anticipated for this activity and the number of hours annually?
18. Section 3.0 Reclamation Plan states that "Overburden and intraburden from each successive mining stage would be backfilled and stockpiled in the area of the depleted stage above the area of active mining." Based on the current mining configuration of the lower pit this does not appear to be the case. Backfill material will be transported from other pits as available. Clarify stockpile locations, type and volumes available on site for reclamation purposes.
- a. Additionally, if mining will not continue as described, the plan shall be revised to reflect the current operation.

Please submit your response(s) to the above listed issue(s) by Monday, July 15, 2024 in order to allow the Division sufficient time for technical review. If you cannot address the above issues by July 15, 2024, please request an extension to the decision due date to ensure adequate time for the Division to review materials. The current decision due date is **July 20, 2024**. If any adequacy issues remain by the decision due date the Division may deny your request.

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. Amy Yeldell at the Division of Reclamation, Mining and Safety, Room 215, 1001 E 62nd Ave Denver, CO 80216. Direct contact can be made by phone at 970-210-1272 or via email at amy.yeldell@state.co.us

Sincerely,



Amy Yeldell
Environmental Protection Specialist

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