

July 17, 2024

**Colorado Division of Reclamation, Mining and Safety
Mine Land Reclamation Board
Room 215
1001 E 62nd Avenue
Denver, CO 80216**

Attn: Lucas West, Cammile Mojar

Re: Reclamation Status DOE leases JD-5 and SR-13

From: Gold Eagle Mining, Inc

Gold Eagle Mining, Inc. (GEMI) is formally requesting a hearing before the Mine Land Reclamation Board for a time extension for the reclamation activities proposed for the following sites which are located on Department of Energy (DOE) leases in western Colorado:

DOE Lease Name	DRMS Permit Number
C- JD – 5	M – 1977 - 248
SR 13 Burros	M – 1977 – 297
SR 13 Ellison	M – 1978 - 342

GEMI has initiated some reclamation activities on these sites, including cleanup of trash and debris, removal of equipment, and removal of structures. However, DOE informed GEMI that no additional reclamation can be performed until NEPA clearances have been completed for the proposed reclamation work. Gold Eagle Mining is currently responding to DOE by preparing Environmental Checklists and performing NEPA surveys of each of the above mentioned sites before reclamation activities can begin.

The current estimated timeline for NEPA approvals is as follows:

1. Real West Natural Resources has completed field surveys and is preparing a draft environmental site report to DOE for T&E species evaluation. The draft report will be reviewed by DOE and BLM for inclusion in the NEPA analysis and for any timing, mitigation, or avoidance stipulations which may be applied to the sites individually.

2. Alpine Archaeological Consultants was contracted by Gold Eagle Mining, Inc. on April 23, 2024 to complete Class III cultural surveys of each site. The first step is pre-field work, including obtaining Office of Archaeology and Historic Preservation file search results, and receiving field work authorizations from BLM. Anticipated timeline 30-45 days, complete by early June.
3. Alpine Archaeological Consultants will then perform the Class III cultural site surveys. Anticipated timeline 8 days, complete by mid-June.
4. Upon completion of field surveys, Alpine Archaeological Consultants will prepare the cultural survey report and submit it to the DOE NEPA coordinator. Anticipated timeline 45 days, with the completed report submitted in late July / early August.
5. Upon receipt of the cultural survey report, DOE will submit it to the State Historic Preservation Officer for 30 days review. Concurrently the document will be reviewed by DOE, BLM, and DRMS. Anticipated end of review period approximately early September.
6. Upon completion of the environmental reports review, the DOE NEPA team will make a determination for each site of the level of environmental review required. These sites may qualify for a Categorical Exclusion (CATEX). Final approval of the work on sites qualifying for a CATEX may be received within 2 weeks of the end of the review period, or as early as mid-September if there are no comments. If there are comments, more time may be required for GEMI to answer them.
7. For sites with cultural resources, such as JD5, or environmentally sensitive species, an Environmental Assessment (EA) may be required resulting in a Finding of No Significant Impact (FONSI) or if required, a more rigorous Environmental Impact Statement (EIS) may be required. The minimum timeline for preparation and approval of an EA is anticipated to be 1 year with a FONSI and longer if an EIS is required.

As shown on the enclosed timeline, the earliest approval under a CATEX is anticipated would be mid-September. The current deadline for completion of reclamation on these sites is October 1, 2024. The anticipated time to complete reclamation work on each site is as follows:

Depending upon whether or not a CATEX is issued and when the approvals are completed by the DOE, there may or may not be enough time to complete the reclamation work prior to October 1, 2024 depending on contractor availability and weather.

If an EA is required, no work can be completed until 2025. If work is to proceed in 2025, there are wildlife timing stipulations that may be applied as part of the NEPA analysis as follows:

Wildlife Species Restrictions	Restriction Period
Mule deer and elk critical winter ranges	December 1 to April 15
Gunnison Sage Grouse	March 1 – July 15
Bald Eagle	December 1 – July 31
Golden Eagle	December 15 – July 15

Depending upon the presence or absence of individual species on the sites, the reclamation work could be restricted to a window starting after July 31 and ending by December 1.

While it is the intent of Gold Eagle Mining to complete the required reclamation activities at these sites in a timely manner, because of delays due to the additional NEPA requirements imposed by DOE Legacy Management, Gold Eagle Mining is requesting DRMS consider a time extension to complete reclamation on these sites to, October 30, 2025

Estimated Time

JD – 5	4 days
Burros/ Ellison	2 days

Completion of the original extension date of October which was agreed to by GEMI and granted by MLB now looks like a pipe dream. BRS Consultants has provided information and documentation to DOE. After review additional information is requested. The Hawkeye which is now released was completed by simply following agreements with DOE, BLM and DRMS. Now we are jumping through hoops that beyond the Code of Federal Regulations related to solid mineral mining under the 3809 Surface Management section:

<https://www.ecfr.gov/current/title-43/subtitle-B/chapter-11/subchapter-C/part-3800/subpart-3809>

If you have any questions regarding this request, please contact Gold Eagle Mining, Inc. directly or their consulting engineer, BRS, Inc. at 307-857-3079 or brs@brsengineering.com.

Thank you for your time and consideration,



Don Coram
President

Cc:

Brian Mangan, DOE
William Burns, DOE
Harold Hutson, BRS