



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

August 5, 2024

Joseph Harrington
MineWater LLC
10924 Leroy Dr.
Northglenn, CO 80233

**Re: Adequacy Review, Technical Revision TR2
London Mine, Permit No. M-2023-015**

Dear Mr. Harrington,

On July 31, 2024, the Division received the TR2 Technical Revision application for the London Mine, Permit No. M-2023-015, regarding the importation of historic waste from the Buckskin Joe Mine for processing. The following items need to be addressed prior to the DRMS approving TR2. Please respond to this Adequacy Review with the requested information by summarizing each response to the numbered items below, in a cover letter titled "Adequacy Review Response TR2; M-2023-015".

1. Please provide the amount of material which will be imported for processing from the Buckskin Joe Mine.
2. The Financial Warranty will need to cover the maximum amount of Non-Shot, processing fines, and sorted product that will be stored temporarily on-site associated with TR2. The current Financial Warranty covers a maximum, at any one-time, of 2,000 CY of mineralized fines and sorted product to accumulate on-site from processing historic wasterock stockpiles located within the permit boundary. Please discuss how this commitment will be revised to allow the importation of the additional TR2 material.
3. Please provide an approximate percentage of the material that is anticipated to remain on-site after processing versus sorted product which will be hauled off-site for further milling.
4. Please provide timeframes associated with the importation and processing of the TR2 materials. Please also provide the maximum amount of time that Non-Shot, processing fines, and sorted product will be on-site.
5. Please provide details on size and anticipated amount of fines that will be generated from the processing of the TR2 material. Please discuss how these fines will be handled and provide their ultimate fate.
6. Please discuss how the samples were obtained for the TR2 Non-Shot and Sorted Waste samples.
7. Please propose a sampling plan frequency of the sorted waste that will remain on-site to confirm the initial results sampling results provided in TR2.
8. Please discuss how and where the Sorted Waste will be disposed of on-site. Please also discuss if placed materials will be tracked and discussed/depicted within the Annual Report/Map.

This concludes the Division's adequacy review of this application. This letter shall not be interpreted to mean that there are no other technical deficiencies in your application; other issues may arise as additional information is supplied. Please be advised the application may be deemed inadequate, and the application may be denied on August 30, 2024, unless the above-mentioned adequacy review items are addressed to the satisfaction of the



August 5, 2024

Page 2 of 2

Division. If more time is needed to complete the reply, the Division can grant another extension to the decision deadline. A request for additional review time must be received no later than the deadline date.

If you have any questions, please contact me at 303-866-3567 ext. 8132 or elliott.russell@state.co.us.

Sincerely,



Elliott R. Russell
Environmental Protection Specialist

Cc: Zach Trujillo, Division of Reclamation, Mining & Safety
Ben Langenfeld, Greg Lewicki and Associates