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August 2, 2024

Amy Yeldell, Environmental Protection Specialist
Colorado Division of Reclamation, Mining and Safety
1313 Sherman St., Rm. 215
Denver, CO 80203

Re: TR-37 Adequacy Review #2 Response – Climax Mine Permit No. M-1977-493

Dear Ms. Yeldell:

The purpose of this letter is to provide additional information requested in DRMS's June 10, 2024, TR-37 Adequacy Review. The Division's comments are in italics with Climax's response following.

Adequacy Review #1 - Outstanding

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. Revised LBS PLS/Acre sum to the total and subtotals as currently listed. However, on Table E-7.1.4 Hydric Seed Mix, the Mertens Rush LBS PLS/Acres is 0.00. Please provide a LBS PLS/Acre for this species and update table totals.

Table revised as requested. Merten's rush LBS PLS/Acre changed to 0.005. Totals have been updated. Note that the total did not change because the previous values were rounded to 2 significant digits.

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. No updated discussion provided yet.

Text will be revised.
Climax will provide a table listing the reagents, typical volumes, the chemical state (solid or liquid) and if they are hazardous vs non-hazardous for disposal. Prior to closure, Climax will use reagents, depleting the quantity remaining at closure to a small quantity. Climax will return unused reagents to the supplier.

Climax has provided the estimated cost to return reagents to the cost model. Quantities are assumed based on the tank's storage capacity listed in Table T-A-1 in the current Environmental Protection Plan. The cost is based on a quote provided by Univar Solutions to remove Hydrocal 60 ($0.02/pound) plus restocking fee. None of the reagents are hazardous.

Reagent	Quantity	Units	State	Hazardous
Hydrocal 60	13,500	Gallons	Liquid	No
Tergitol NP -4	165	Gallons	Liquid	No
Froth Pro 509	9,300	Gallons	Liquid	No
CorsiTech FrothPro 327	600	Gallons	Liquid	No
Orfom D8	10,000	Gallons	Liquid	No
Nokes	18,000	Gallons	Liquid	No
FloatSil™ (sodium silicate)	2,100	Gallons	Liquid	No
Lime	225	tons	Solid	No
Polymer Ventures DAF-30	8,250	Pounds	Solid	No
Nalco 7561	3,000	Gallons	Liquid	No

New- Exhibit L – Bonding Specific

Open Pit

1) *What is "Grade west open pit periphery"? How is this different from the overburden and topsoil grading or final finish grade?*
   a) *Task is not included on L-17 but provided under CSV as a volume of 26,560.*

The task was a remnant from previous versions and is no longer applicable. The item has been removed from the model.

   b) *What is the material consistency and push gradient?*

No longer applicable.

2) *What is the material consistency of the "Haul overburden-Waste rock removal task"?*

Agreed during July 15 workshop with DRMS.

Material consistency factor for spread is 1.2.

Material consistency for load/haul partially consolidated 1.1

3) *What is the push gradient associated with spreading/dozing the 27,000 CY of topsoil at the Open Pit?*

Push factor 1.0, assumes 0%. Dozer will operate along bench.

4) *Where is the overburden associated with task 110.8 being hauled from? The CVS states Arkansas Basin while L-2 and Table 1 state haul from mill and Ceresco Ridge. Is 15,840 LF the average haul distance of all of these locations?*

As described in Section 2.2 paragraph 4. "The material is hauled from the overburden pile located south of the mill area along and below Ceresco Ridge in the Arkansas River basin." The descriptions described the same area. Table 1 will be revised to "Arkansas River Basin". The haul distance is the haul distance from centroid of the stockpile to centroid of the pit periphery.

5) *What is the number of acres to be revegetated at the Open Pit? This is the area being covered by the 27,000 CY of topsoil. Table E-8 states 241.1 associated with the Mill and Pit area.*

Due to access issues, the cost estimate assumes that the pit itself will not be revegetated. The 241.1 acres is for the mill area and includes the area of the overburden pile located south of the mill area along and below Ceresco Ridge in the Arkansas River basin will that be excavated and hauled to the pit bottom.

6) *Please verify the number of "No Trespassing" signs to be installed around the open pit. According to L-2 40 signs will be installed vs the CVS state 41 signs.*

Text revised to 41.

7) *Has the 2,800 LF of pipe for the dewatering system been installed to date?*
   a) *If not, it needs to be bonded until it has been installed. Please provide cost data for installation of this feature.*

Cost to install 2,800 lf of 30" corrugated HDPE pipe has been added to the cost model. Text revised.

<u>Mill Complex</u>

8) *CVS Cost data covers 236 ac to be reclaimed while page L-17 states 241 ac to be reclaimed. Please clarify the number of acres to receive topsoil and be revegetated.*

Cost model has been corrected to 241 acres.

<u>North 40 OSF</u>

9) *1,919,000 cy of material will be graded to a 2H: 1V. What is the push gradient used?*

Push gradient factor of 1.6 assumes a downhill gradient of 30% (maximum gradient in CAT Handbook

table).

McNulty OSF

10) *Please clarify the total volume of cover material to be used at McNulty OSF. CVS Cost data states 2,187,00 CY between 3 piles, while page L-16 states 2,206,000.*

Page L-3 and Table 1 corrected to 2,187,000 CY.

11) *9,253,000 cy of material will be graded to a 2H: 1V. What is the push gradient used?*

Push gradient factor of 1.6 assumes a downhill gradient of 30% (maximum gradient in CAT Handbook table).

12) *60,000 cy of material will be graded for the haul road. What is the push gradient used?*

Push gradient factor of 1.0 assumes a gradient of 0%.

Tenmile Tunnel

13) *Is the TDL considered hazardous or can it be buried in place?*

The tailings delivery line is not hazardous.

Per discussion in July 15 workshop with DRMS, a line item will be added to remove the tailings delivery line. There are 12,808 LF of 42-inch RCP pipe. Unit cost from RSMeans line item 02 41 12 38.0100 for demolition of 42-48 inch concrete pipe. Productivity is 12 linear feet per hour. Unit cost from RSMeans line item 02 41 13 38.1900 for demolition of 20-36 inch plastic pipe (36-inch HDPE). Productivity is 25 linear feet per hour. Hauling cost have been added. The HDPE will be hauled to the Republic Landfill in Golden, Colorado.

Ten Mile TSF

14) *Please clarify the total volume of cover material to be used at Tenmile OSF. CVS Cost data states 2,121,032 CY between 5 piles, while page L-4 and L-14 states 2,077,000.*

Volumes in CVS revised to total 2,077,000.

15) *The 2019 estimate includes a task for pumping (Dredge and Pump Sludge to Tunnel) which accounts for 388.26 hrs and $87,098. No mention of this task was included in this estimate. Please either provide bonding information or a justification as to why the Division no longer needs to bond for this item.*

That activity is no longer a necessary component for our closure plan as we now plan to utilize

Tenmile Tunnel in our closure plans.

3 Dam

16) *Please provide the haul distance and grade for the 94,000 CY of cover material to be transported.*

Haul distance is 1.0 mile, gradient is 5.7%. Tab has been updated to calculate haul times using this distance and grade.

17) *Is additional revegetation required in touch up areas for installation of the new channel? If so please state how many acres?*

The 29 acres listed includes the area where the channel will be constructed. No additional acres are required.

Pond Shop

18) *How many acres are associated with revegetation at the Pond Shop?*

The CVS has been updated with the revegetation area, 0.77 acres.

19) *Please provide the haul distance and grade for the 538 CY of cover material to be transported.*

The CVS has been revised to update the haul distance and grade. Haul distance is 917 feet, grade is 7.3%.

Mayflower Seepage Collection Building

20) *Please clarify the total volume of cover material to be used at Mayflower Seepage Collection Buildings. CVS Cost data states 2,690 CY while Exhibit L states 2,700.*

The difference is rounding error. Volumes in the table are rounded up to nearest 1000 CY. Volumes in CVS are nearest 1 CY.

All cover volumes in the text and Table 1 will be updated to match the volumes in the CVS.

21) *Similarly the total amount to be graded varies between 33,873 CY and 34,000 CY.*

The difference is rounding error. Volumes in the table are rounded up to nearest 1000 CY. Volumes in CVS are nearest 1 CY.

Robinson TSF

22) *Please clarify the total volume of cover material and backfill to be used at Robinson TSF. Total volumes (cover + import) vary between the CVS Cost data and page L-5 and L-13 by approximately 54,000 CY.*

The difference is rounding error. Volumes in the table are rounded up to nearest 1000 CY. Volumes in CVS are nearest 1 CY. The text on Page L-5 has been corrected to match the Table 1.

23) *What is the total number of acres to be revegetated? 457 ac and 455 ac are referenced on page L-5. Table 1 states 457 ac.*

Page L-5 corrected. Acreage is 457.

Roads

24) *Will any contouring/grading be required or are roads only going to be topsoiled?*

Access roads that are permanent shown on Figure F-01 will not receive any cover or grading. Access roads to be reclaimed will be ripped with a dozer and will receive closure cover afterwards. Large haul roads on the south side of the pit and east of the North 40 OSF will be regraded to an overall slope of 2.5H:1V by cutting out the road and using that fill to flatten the existing fill slope. These cut to fill quantities are included in the Mill and North 40 OSF quantities.

25) *Several road segments were identified on the CVS Cost Data. Slopes and seed mixes will vary site wide, please provide the following information by road segment.*

a) *How many acres of roads are associated with each seed mix type?*

Seed Closure Cover (Standard seed Mix Flat Areas)	42.88
Seed Closure Cover (Wetland Seed Mix)	18.36
Alpine Seed Closure Cover	51.58

The roads tab in the CVS will be updated to distribute the revegetation cost as described above.

b) *What is the CY of material to be hauled for cover material to each segment?*

Mayflower Roads	95,000
Tenmile Roads	24,000
Robinson TSF Roads	20,000
Robinson Lake area Roads	60,000
McNulty Roads	166,000

The Roads tab will be updated to distribute the 365,000 CY of cover between the segments shown above.

Please note these cover volumes do not include the volume of the large haul roads regraded and described in "24". Those haul roads will be regraded to a gentle slope and will receive closure cover.

c) *What is the haul distance and grade for each segment?*

Mayflower Roads	3.64	0.6%
Tenmile Roads	1.06	4.5%
Robinson TSF Roads	2.58	1.9%
Robinson Lake area Roads	2.63	0%
McNulty Roads	0.81	7.9%

d) *Will ripping (decompaction) be employed? If not, provide rationale.*

Yes, ripping will be required on roads to be reclaimed. The ripping is required to allow the closure cover soils to bond with the existing soils. Ripping is already included for each of the road segments associated with each facility on the appropriate tab.

26) *What areas are covered under the Misc. Roads?*

Roads colored purple in Figure F-01.

<u>Robinson Lake</u>

27) *On the CVS Cost Data there is an item "Pre-Excavation Work and Water Management" which costs $519,326. Please describe what is associated with this cost? This information should also be described in other applicable exhibits.*

Pre-excavation work includes installing diversions and dewatering. The cost is a lump sum estimate based on actual contractor costs for similar work in 2010. The 2010 costs have been escalated to 2024 costs for inflation based on the increase in the CPI (37%). No detailed designs are available. A more detailed estimate will be provided prior to the actual final closure date.

28) *On the CVS Cost Data there is an item "Finish Work" which costs $129,000. Please describe what is associated with this cost? This information should also be described in other applicable exhibits.*

Finish work includes final recontouring at Robinson Lake. The cost is a lump sum estimate based on actual contractor costs for similar work in 2010. The 2010 cost has been escalated to 2024 costs for inflation based on the increase in the CPI (37%). No detailed designs are available. A more detailed estimate will be provided prior to the final closure date.

29) *30,000 CY of waste rock from McNulty OSF is called out to build the temporary haul platforms on the CVS Cost Data. Is 30K the total amount of waste rock to be used or is it 15k and the 30k is the total volume to be hauled to and from Robinson Lake?*

The 30,000 CY is the quantity that will be hauled from McNulty OSF to Robinson Lake to construct access and work platforms. The cost to load, haul and place the waste rock back to McNulty OSF has been added to the CVS.

a) *Please confirm if waste rock will be returned to McNulty OSF. If the material will be hauled to a different location, please provide haul distance and grade.*

Waste rock will be returned to McNulty TSF.

30) *What is the material type for hauling of the temporary platform?*

Material weight was 1600 lbs/CY, corresponding to topsoil. All stockpiled material consists of a mix of weathered waste rock, alluvium topsoil and subsoil. The topsoil designation is considered appropriate.

Per agreement during the July 15 workshop, material type for the temporary platform (from McNulty OSF) will be broken granite, which has a density of 2,800 pounds/CY. Haul times and dozer productivity have been revised in the cost model for the revised material type.

31) *Please clarify the seed mix to be used at Robinson Lake. CVS states Alpine, while pages L-6 and L-15 say Hydric/Wetland.*

The CVS has been revised to use the wetland seed mix.

32) *Does the 43 acres to be reclaimed at Robinson Lake include revegetation of the temporary haul platforms once removed?*

Yes.

33) *The CVS mentioned installing 1,720 LF of Clean surface water channel at Robinson Lake. However, L-6, Table 1 states 3,100 LF between Robinson Lake and Eagle Park Reservoir and Chalk Mountain Reservoir to Robinson Lake. This means that based on L-6, 1,380 LF of clean water channel is unaccounted for. Please address.*

Lines 25 through 29 in the CVS Robinson Lake tab are the cost to construct the 3,100 LF of Clean Water Surface Channel. Quantities in CY are volume required for 3,100 LF.

The notes have been corrected to change "…install **1,720'** clean water surface channel to **3,100'**.

<u>Dam</u>

34) *Please clarify the total volume of cover material to be used at 5 Dam. Total volume on the CVS Cost data is 196,170 CY while page L-6 and L-13 state 197,000 CY.*

The difference is rounding error. Volumes in the table are rounded up to nearest 1000 CY. Volumes in

CVS are nearest 1 CY. The text has been revised to match the volumes in the CYS.

35) *Page L-7 states that 2,800 LF of a Clean Water Surface Channel will need to be constructed. While Table 1 item 103.7 and the CVS states that 2,900 lF is required. Please clarify the total distance of the new channel to be installed.*

2,900 LF is correct Page L-7 has been corrected.

Underground Mine Openings

36) *Will any grading or earth work take place in addition to the concrete seals?*

No regrading is required.

37) *Please provide total job hours per closure for the four openings.*

The reference project cited for the unit costs installed approximately 342 CY of plugs. The project required 4,030 hours. This equated to approximately 11.8 hours/CY of plug. Therefore, the hours required for each plug are:

- Storke Portal 12.44 CY 147 hours
- No. 3 gallery 4.74 CY 556 hours
- Phillipson Portal 11.11 CY 131 hours
- Tenmile tunnel 111 CY 1,307 hours

The costs and labor are considered to be conservative, because the reference project required installing a remote plug in the workings, while the Climax plugs will be at the entrance to the workings.

Impacted Water Treatment

38) *Commit to providing the Division with the actual additional cost for Molybdenum WTP within 6 months of the plant operating.*

Climax commits to providing actual additional cost for molybdenum treatment within one year of plant operating.

a) *Until such time, please provide an anticipated cost.*

The anticipated additional cost is incorporated into the cost shown on the Impacted Water treatment tab. The additional cost (includes labor, power, reagents and maintenance) is $1,201.91/Million gallons.

Maintenance, Monitoring and Environmental Controls

39) *Please provide cost data for the 13 water monitoring wells to be plugged and abandoned.*

Well abandonment cost is $3.74/LF. Source is RSMeans 4th quarter 2023 line item 02 41 13 76.0900

Selective demolition water wells, Slotted PVC wells 1-1/4 to 8". Cost includes bare labor and equipment. The cost data and source have been added to the Materials tab.

40) *How many hours annually are associated with Water Quality Monitoring? *Annual hours will be multiplied by 30 yrs.*

Water quality monitoring includes 100 labor hours per year for sampling.

Demolition Tasks

41) *The reclamation plan states that foundations greater than 3ft below final grade will be pulverized and left in place. While any foundations closer than 3 ft to final grade will be removed.*
   a) *Please indicate which foundations will be pulverized vs. removed.*

The CVS has been updated to include cost to demolish all foundations and footings. Dimensions for floors, and footings from the 2019 estimated have been used. All foundations, floors and footings will be buried in place during regrading.

   b) *Also indicate where removed materials will be disposed of. If on site, please provide haul distance and grade information.*

Removed materials will be disposed in the pit with the Arkansas River Valley/Cerresco Ridge materials. The RSMeans building demolition unit cost includes and assumption of a 20-mile haul for disposal. Thus, no additional haul cost is included.

   c) *No cost data for foundations/footers were provided under the Demolition -Structure CVS, only removal of superstructures were accounted for. Please include cost data for the various foundations and footers based on their disposal methods.*

The CVS has been updated to include cost to demolish all foundations and footings. Dimensions for floors, and footings from the 2019 estimated have been used. All foundations, floors and footings will be buried in place during regrading.

42) *Please address how you will decontaminate concrete which has come into contact with reagents. Additional clarifications may need to be made under other exhibits as well.*

Climax proactively collects and cleans any spills of reagent during operations as required by the Environmental Protection Plan. No significant contamination is anticipated. However, the demolition cost includes $400,000 which has been added since the 2019 estimate. The $400,000 represents decommissioning costs included to cover activities such as rinsing tanks and equipment and surficial cleaning (i.e., decontamination) of any concrete. Climax will develop a more detailed estimate based on actual contractor budgetary estimates and bids prior to the final closure date.

43) *Open Pit Phase 2 Shop was previously noted to be 400 x 80 x 70 in the 2019 calc. In the CVS it is listed as 440 x 80 x 70. What is the actual size?*

440X80x70 is the correct size.

44) *The new mill building volume was previously listed as 11,497,500 CF while the 2024 estimate states 11,563,825 CF. Please confirm the actual size of this structure.*

11,563,825 is correct.

45) *The Supply Canal No. 2 Pipeline volume was previously listed as 393 CF while the 2024 estimate states 565 CF. Please confirm the actual size of this structure.*

565 CF is correct.

46) *The following structures were included on the 2019 bond calc but were not a part of the 2024 estimate. Have they been removed? Or has the structure been renamed?*
   a) *"Chalk Mountain / Robinson Lake Sub" with dimensions of 20x8x8*
   b) *"Carv Substation - Superstructure" 28x20x15,*
   c) *"Carv Substation – Floor" 10x20x12*
   d) *"Old Hospital Sub - Super Structure" 60x30x*
   e) *"Old Hospital Sub - Floor" 44x8x12*
   f) *"Tailings Delivery House Substation" 8x8x8*
   g) *"Tailings Delivery House Substation - Containment Cell" 8x8x12*
   h) *"3 Dam Pumpstation" 36x30x30*

Demolition of the following structures listed below have been added to the cost model:

Chalk Mountain / Robinson Lake Sub
3 Dam Pumpstation

Demolition of one substation located near the truck shop has been added to the cost model (old Phillipson Substation).

The remaining structures no longer exist.

47) *Two separate line items for decommissioning ($150K and $250K) are included on the Demolition-Structures CVS. Please provide a detailed list as to what items are covered under each of these items to make up the lump sum.*

The decommissioning line items were originally included in two separate tbs. The two tabs have been combined into one tab. The two line items will be combined into one $400,000 item. The decommissioning work includes rinsing of tanks, equipment, and transfer systems and collection and recycling/disposal of remaining reagents and oils. The cost represents approximately 3 weeks of labor, materials, equipment (e.g., pressure washers, vacuum trucks), and transportation and disposal fees. Climax will develop a more detailed estimate based on contractor bids prior to the planned closure date.

48) *Does decommissioning of the mill include cleaning (decontamination) of all the tanks and equipment prior to removal?*

Yes, the decommissioning estimate includes rinsing of tanks, equipment, and transfer systems.

49) *Please elaborate as to what is covered under the $100,000 associated with "Remove Regulated Materials" on the Demolition-Structures CVS.*

Removal of regulated materials includes labor, materials, equipment (e.g., forklift, manlift), and transportation and disposal/recycling costs for the collection of materials such as florescent light bulbs and ballasts, LED lights, fire extinguishers, batteries, electronics, thermostats, refrigerants, switches, capacitors, transformers, and other materials requiring proper disposal or recycling, as applicable, prior to demolition. A comprehensive regulated material survey has not been performed to date. Climax will perform this survey and develop a more detailed estimate based on contractor bids prior to the planned closure date.

50) *Will the Seep Pump Stations ever be removed, or are they expected to operate indefinitely? If at the end of the 30-year period water treatment ceases, they too should be removed. Please clarify and address this concern.*

4 dam seep, and Robinson lake be removed. Storke, 1 Dam, 5 Dam, will remain for monitoring purposes. Demolition cost have been added to the Demolition tab in the cost model.

<u>Misc. / All</u>

51) *What is the material description, materials cycle time and bucket fill factor for Loading/Hauling of the Cover Material?*

All cover material is classified as topsoil. Material cycle time is calculated in the production tables on each tab. Cycle times are based on haul distance and gradient. Bucket fill factor was not used in the productivity calculations. The loader bucket capacity was based on average bucket capacity from the Cat Handbook Ed. 47. The bucket capacity will be updated to address the DRMS recommendation to replace the 938K loader with a larger loader (966M). Loader Bucket capacity of 5.5 CY per Cat Handbook Ed. 47 will be used. Assuming 5.5CY per bucket is appropriate for this level of cost estimate considering the nature of the material and the fact that it is being mine from a stockpile and not a bank.

During the July 15 workshop climax and DRMS agreed to revise material factors as follows:

Cover material (topsoil)

Swell factor 1.2

Material factor load/haul 1.1, push (regrade) 1.2

Weight factor 2,300/1,600 = 1.44

Overburden

Swell 1.3

Material factor load/haul 1.1, push (regrade) 1.2
Weight factor (broken granite) 2300/2800 = 0.811

Bedding and riprap use gravel material

Swell 1.0
Material factor load/haul 1.1, push (regrade) 1.2
Weight factor 2300/2550 = 0.902

52) *For the bedding material. Please provide the: material description, material type, materials cycle time and bucket fill factor for Loading/Hauling of the Bedding Material?*

Material description for the bedding material assumed topsoil. The haul cycle time calculations will be revised to assume gravel (2,550 lb/CY). See response to comment 51. Bucket capacity will be revised to 5.5 CY. Productivities will be recalculated for bedding material.

53) *E-6.2 states that cover material may be ripped to reduce compaction.*

a) *Specifically, which areas will be ripped, and how many acres by area are anticipated?*

E-6.2 will be revised to state that cover material on level areas will be scarified using an agricultural tractor and disc. The Unit cost has been added to each facility from RSMeans (2024) 32 91 13 23.6000 (tilling topsoil, 2-inch depth, disk harrow).

In the cost model, all level topsoil areas will be revised to include scarifying, applying straw mulch (2,000 pound /acre and drill seeding). Straw mulch and drill seeding rates are from the contractor provided rates for 2023 from the Standard Reclamation cost Estimator model (SRCE 2023).

b) *What is the average ripper distance per pass?*

Ripper productivity is calculated based on CAT Handbook Ed. 47. Productivity is based on the following assumptions:

- CAT D7
- 3 shanks, width 5.92 feet
- Pocket spacing 2.92 feet
- Ripping width = 8.84 feet
- Ripping speed 1 mile/hr, 5280 ft/hr
- Ripping productivity = 46,675 ft/hr = 1.07 Ac/hr

No ripping distance was used.

c) *If ripping is not employed, will other surface roughening/seedbed preparation take*

place?

See item 53a. Ripping is included for the reclaimed haul roads and the mill area.

54) *There was no mention of removing culverts. If roads will be removed the culverts should be removed as well. Please provide an itemized list of all applicable culverts which includes length, diameter and building material. Clarify the disposal method.*

The attached Excel file (Culverts Removed at Closure.xlsx) includes the information requested. Culvert removal cost has been added to the Demolition 2-Linear Facilities tab on the cost model Unit costs are from RSMeans. Culverts will be disposed in the pit. One hour per culvert has been added for an 18CY dump truck.

55) *Please provide the updated 2024 cost for 30" corrugated HDPE Installed (RS Means 33 3111.20 3160)*

No 2024 cost is provided in RS Means for the line item. As discussed during the July 15, workshop, the 2013 unit cost has been adjusted to account for inflation using the change in the CPI from November 2023 to July 2024 (2% increase.) the adjusted unit cost is 478.33/LF.

These responses have been incorporated in Exhibit E, F and L. The revised exhibits are attached. Changes are in track changes.

Please feel free to contact me at (719) 486-7633 or edetmer@fmi.com if you have any questions.

Sincerely,

Eric Detmer
Manager, Environmental

Attachments

1) Exhibit E - Reclamation Plan
2) Exhibit L 2024 Reclamation Cost Estimate Update
3) Exhibit F – Maps
4) Culvert Excel file culverts Removed at Closure.xlsx