



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

August 19, 2024

Eric Detmer  
Climax Molybdenum Company  
Highway 91 - Fremont Pass  
Climax, CO 80429

**RE: Climax Mine, File No. M-1977-493 , Technical Revision (TR-37) Adequacy Review-4**

The Division of Reclamation, Mining and Safety (Division) received your previous adequacy responses. The Division has reviewed all material submitted to date and determined that the following issue(s) of concern shall be adequately addressed before a decision can be rendered.

**Adequacy Review #3**

14) How many task hours are associated with installing the hydrologic protection features?

Please list by area the anticipated number of hours.

**The number of task hours associated with hydrologic protection features for 3 Dam was not provided.**

**NEW Adequacy Review #4**

1. In the provided CVS, initial volume and final volume for transported materials take into account a swell factor. However, the dozer spreading of this transported material does not use the corresponding final volume that's in LCY. Similarly, if the initial transport volume in CCY is to be used a swell factor in the correction factors down below should be applied.
  - a. All transported volumes that are in LCY will have a 1.2 Loose stockpile for material consistency.
2. Rolling resistance haul road conditions provided were 2.5 packed snow. The Division will use 3.0 firm packed maintained road.
3. The revegetation cost for Mayflower TSF are missing. Please specify what areas by acreages will receive which revegetation treatments.
4. Please clarify why no disposal cost for reagents should be factored in. Unmixed chemicals were described as being returned to the vendor. What about mixed chemicals.



5. No correction factors for Tenmile TSF – Spreading Topsoil 33 were provided.
6. The Roads task previously utilized a 4000 gallon water truck. No support equipment is included in this task, please add this associated cost.
7. Please provide the Floor thickness for the following features:
  - a. Explosives Shed (Powder Storage) – Floor
  - b. New Mill Building – Floor
  - c. Train Shack at Ten Mile North Portal – Floor
  - d. MAYFLOWER HLDNG TANK - Floor

Please submit your response(s) to the above listed issue(s) by **Monday, September 9, 2024**, in order to allow the Division sufficient time for technical review. The current decision due date is **September 30, 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.

Sincerely,



**Amy Yeldell**

Environmental Protection Specialist

Ec:

Travis Marshall, Senior EPS, DRMS  
Dustin Czapla, DRMS  
Todd Jesse, DRMS  
Alex Ungers, Climax