

August 28, 2024

Garrett C. Varra
Raptor Materials, LLC.
8120 Gage Street
Frederick, CO 80516

**RE: Adequacy Review No. 2; Technical Revision No. 1 (TR-1);
Two Rivers Sand, Gravel and Reservoir Project, Permit No. M-2022-013**

Dear Mr. Varra,

On August 22, 2024, the Division of Reclamation, Mining and Safety (Division/DRMS) received your responses to the Division's preliminary adequacy review dated July 18, 2024. After review of your responses the Division has identified the additional items that need to be addressed.

1. Please provide a detailed summary of the proposed changes in Exhibit L compared to what was approved during the original application process (specifically Exhibit L provided during adequacy review response no. 4). At a minimum, it appears the Operator is proposing to reduce the reclamation liability by reducing the area proposed to be disturbed during the initial phase of mining from 70.21 acres to 51.07 acres. While the relocation of the processing and plant area eliminates the need for a conveyor system.
2. In Exhibit L, page 2, the area of the yellow hatched area needs to be provided. The area dimensions must be clearly shown on the Exhibit L map.
3. In Exhibit L, page 4 second paragraph, it is stated that the initial excavation will be 51 acres resulting in 4,310 ft of external perimeter pit wall. In the original application the initial excavation was to 40 acres resulting in 6,200 ft of external pit wall. Please explain the difference.
4. In Exhibit L, page 4 third paragraph, there appears to be a discrepancy between the lengths provided in this paragraph compared to the preceding paragraph, please clarify.
5. Please explain how the volume of water to be removed from the 51.1 acres was calculated in the dewatering task. The Division used the calculation method detailed in the approved exhibit and arrived at a different volume which in turn results in a different cost estimate.



6. The 30-day dewatering volume calculation appears to have been calculated incorrectly, please verify and update as needed.
7. Comment - In the grading task, page 5, the highwall lengths need to be consistent with the lengths provided in the preceding sections.
8. The highwall length to be excavated at 2H:1V length of 2,121 feet could not be verified on Map C-2. The length closest to this is value is the 2,150 feet along the southern portion of yellow hatched area. Should these two lengths be the same or what accounts for the difference? Exhibit L map needs to be updated with a consistent length to be used.
9. The highwall length to be excavated at 1.25H:1V length of 4,069 feet could not be verified on Map C-2. The combined lengths of the three remaining highwall faces of the yellow hatched area combine to a lower value of 3,937 feet. Please clarify the discrepancy. Exhibit L map needs to be updated with the lengths clearly depicted that sum to the value to be used.
10. Please provide a figure or describe where the 1,880 foot of advancing wall is located. The Division assumes this is the eastern wall of the yellow hatched area.
11. Please provide a figure or describe where and how the 4,320 foot extraction limit wall was calculated.
12. A cost estimate calculation for the keyway at the base of the liner was not provided, please provide this calculation or if it is not required provide an explanation as to why.
13. In the currently approved Exhibit L there is a cost for a perimeter liner at 3H:1V. Why was a similar liner cost estimate not provided in the exhibit currently under review?
14. Please review the volume calculation for soil replacement on 4.8 acres on the Center of the Central Field, the Division calculated a lower volume of material needed.
15. Costs for the establishment and reseeding are not correctly calculated as shown on page 12. Please verify the calculations and update the costs accordingly.

This concludes the Division's adequacy review of your revision application. The Division reserves the right to further supplement this document with additional adequacy items and/or details as necessary.

The decision date for your application is set for **September 19, 2024**. If additional time is needed to respond, an extension request must be received by our Office by the decision date. If on the decision date, outstanding adequacy items remain, and no extension request has been received, your revision may be denied and the file terminated.

If you need additional information or have any questions, please contact me by email at patrick.lennberg@state.co.us.

Sincerely,

A handwritten signature in blue ink, appearing to read "Patrick Lennberg". The signature is fluid and cursive, with the first name "Patrick" written in a larger, more prominent script than the last name "Lennberg".

Patrick Lennberg
Environmental Protection Specialist

cc: Jared Ebert, DRMS

ec: Garrett Varra, Raptor Materials, LLC, gvarra@raptormaterialsllc.com