



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

October 8, 2024

Chris Skerik
Thorin Resources LLC.
1900 Main St. Unit #1
PO Box 1030
Ouray, CO 81427

RE: Revenue Mine, Permit No. M-2012-032, Technical Revision (TR-17), Adequacy Review-2

Dear Mr. Skerik:

The Division of Reclamation, Mining and Safety (Division) is in the process of reviewing the above referenced Technical Revision in order to ensure that it adequately satisfies the requirements of the Colorado Mined Land Reclamation Act (Act) and the associated Mineral Rules and Regulations of the Colorado Mined Land Reclamation Board for Hard Rock, Metal, and Designated Mining Operations (Rules).

During review of the material submitted, the Division determined that the following issue(s) of concern need to be adequately addressed before the Technical Revision can be considered for approval. Please provide the following:

1. In the submitted Adequacy Review Response to Item 1, it was stated that the down gradient wells have been drilled but not yet completed. To verify, please provide the drill logs completed by the driller, and a narrative including any details of casing left in the hole, photo documentation of the hole and what tasks remain to complete the monitoring well. Additionally, please provide documentation that the appropriate Well Installation Permit has been applied for or obtained through the Colorado Division of Water Resources. Please also note that any activity associated with this revision will not be authorized to proceed until both the Groundwater Monitoring Well and Stormwater Containment Pond have been completed and certified where applicable.
2. It is noted that the arrangement of the Secondary Containment Structure has been changed to 6 separate units, however no volumetric demonstrations or dimensions of the units were provided. Please provide the dimensions and volumetric demonstration of containment capacity for each of the 6 units. Since the system will be under pressure, each unit will need to be able to contain the full volume of water/slurry contained within the system, unless the units are connected by some matter of conveyance, in which case the total containment volume would be of the units added together, ensuring the total volume is consistent with the volumes presented in Attachment A of the Adequacy Review Responses.
3. Adequacy Response Item 9 states that the containment units will be constructed of 18oz PVC, however the design specifications included in Attachment C on Pg 7 only specify a 22oz PVC liner. Please Clarify which PVC specifications will be utilized. Additionally, in Exhibit C, the manufacturer recommends the use of ground cloth to prevent punctures. Please commit to the utilization of ground cloth under the liner.
4. The additional bonding information contained in Attachment F is insufficient.



- a. Please provide the specific line number(s) and description(s) from the RS Means handbook for demo of each user provided item listed in Section 6 of the original TR submittal.
 - b. In table format, summarize the total quantity, units and production rate for each item being removed. The quantity / production rate determines the total job hours and costs.
 - c. Based on the RS Means line number(s) equipment utilized can be identified and the required hours necessary.
5. An SDS for "BioZem" was provided and is proposed to be utilized on site. However, the SDS provided did not include required information pursuant to Rule 6.4.21(5)(a). Specifically, the SDS does not address the known potential to affect human health, property or the environment. Please provide more information about the product.
6. With regards to "BioZem" please provide a map depicting all areas in which the product is being proposed to be applied. Please note, that application of the product to areas slated to be reclaimed (i.e. outside of buildings) will require removal and possible offsite disposal upon reclamation and may result in bonding implications.

Please submit your responses to the above listed issues by Monday October 21, 2024 in order to allow the Division sufficient time for review. If you cannot address the above issues by October 21, 2024 please request an extension to the decision due date to ensure adequate time for the Division to review materials. The current Decision Date for this revision is October 31, 2024. If any adequacy issues remain by the decision due date and no Decision Date Extension Request has been received, 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,



Lucas West

Environmental Protection Specialist

Ec: Travis Marshall, Senior EPS, DRMS
Amy Yeldell, DRMS