



TRAPPER MINING INC.

P.O. Box 187

Craig, Colorado 81626

(970) 824-4401

October 10, 2024

Ms. Robin Reilley
Environmental Protection Specialist
Colorado Division of Reclamation, Mining and Safety
1313 Sherman Street, Room 215
Denver, CO 80203

**Re: Trapper Mining Inc., Permit No. C-1981-010
Permit Revision PR-12, L-Pit Additional Cut and AOC Change**

Dear Ms. Reilley:

Attached is Trapper's Permit Revision 12 application. Also attached is a copy of a newspaper public notice for the Craig Press and a revision application form to our existing coal mining and reclamation permit. No new acres of disturbance or change in bond is proposed with this permit revision.

Permit Revision PR-12 proposes to update the mining and reclamation plans with the addition of one cut in the L-Dip pit. With this change the final PMT as proposed on Map M-12, Post Mining Topography, has been altered to reflect the final regrade of this area. With this modification, pages 3-43b to 3-43c and new Appendix B materials are included to modify the AOC variance area to reflect this new regrade plan. Upon review, it may be noted the Map M-6 Worst Case Bond Scenario topography has not been altered. This topography is tied to the worst-case bond backfill scenario in Appendix A and is still applicable to the pit area.

Several discussions between DRMS and Trapper have occurred concerning our reclamation plan and the timeliness of regrade on the site. As Trapper approaches final closure of the site, final reclamation of primarily the L and N Pit areas will need special attention taken to adequately backfill and regrade the pits. The majority of the required backfill materials to attain the final PMT were transported and stored in various spoil dumps or truck benches during the pre-strip truck/loader operations in these pits. This has limited our ability to continue regrade and reclamation efforts in both pits. In the case of L-Pit, only a small corridor on the western edge of the disturbed pit area has been regraded to PMT, but not yet topsoiled. The remaining truck dump benches on the eastern edge of this corridor and west of the pit contain required materials to backfill the final cuts of L-Pit. As such, they cannot be regraded to the proposed PMT, until at such time the material may be transported back to the east as backfill for L-Pit.

In the N-Pit, the original pit concept required a west to east strike pit to be opened in four panels. The initial excavation of the pit took spoil materials to an out of pit spoil dump adjacent to the west end of the pit. Panels 3 and 4 in the west end have just recently concluded mining and are presently being backfilled. Panels 1 and 2 are currently being excavated and the majority of that spoil material is being backfilled into panels 3 and 4. Once mining is complete in the east end of the pit, the out of pit spoil dump will be retrieved as backfill. Until that time, there is limited final PMT regrade that can be done in the N-Pit area. To facilitate the back haul of the spoil pile and future pit ramp access through panels 3

and 4, the west end cannot be regraded to final PMT at this time. Only once N-Pit is complete, and access through the west end is terminated, may the entire area be regraded to final PMT. This will occur over the next few years when production ceases at the site.

Proposed changes to section 3.5: Backfill and Grading (Pages 3-37-3-39) are proposed to more adequately address the extended timeframes required of these truck loader pits. Highwall mining of the exposed final highwalls also extends the backfill and grading timeframes of these pits if it is to occur.

Trapper has submitted a revised ground control plan to MSHA to allow top down highwall mining on the north wall of the remaining two panels of N-Pit. This is in contrast to the current operations where the pit is excavated to the Q-Seam and then highwall mining begins to the north and south of the pit with backfilling to the next higher minable seam and so on. This will allow a portion of the highwall mining to occur as excavation is completed. Page 3-15c is revised to reflect this possible change in highwall mining operations. The accompanying study performed by Agapito Associates, Inc. has been included for inclusion in Appendix X (Inwall HWM Sequence Analysis Proposed for N-Pit, Trapper Mine; July 31, 2024), detailing the safety factors for this approach on the north wall only.

As-built drawings and revised SedCad runs are included for the East Buzzard #3 and West Buzzard #3 and #4 ponds as constructed in the western portion of the permit area. These materials should replace existing Appendix Q, Sections I and II materials previously submitted during the planning phase of these ponds. Tables 4.8-6 and 4.8-7 are also included and updated to reflect these as-built parameters.

Archeological site 5MF948 consists of a small petroglyph panel in Deal Gulch. Concerns about an erroneous position of this site were addressed in late 2015, with this investigation concerns of damage to the site due to blasting were raised as L-Pit worked south and eastward in 2015. Agapito Associates, Inc. (AAI) conducted a study of possible damage and proposed mitigation measures through a modified scaled distance equation when nearer than 1,230 ft of the site and reduced charge weights. They also recommended observation of seismic levels at that site with a maximum PPV threshold of 2 in/s. In late 2015 an Instantel Micromate Seismic Vibration monitoring unit was installed at the site to aid in the AAI study and provide continuing monitoring of the site. From then until the present time, hundreds of seismic events have been recorded at the site. Of these events, only two exceeded 1 in/s PPV. The nearest shots occurred within 650 feet of site 5MF948, although they did not create the highest vibrations. Present operations in the L-Pit are now in excess of 2,400 feet from the site. A summary of the five highest PPV events is provided below for reference. Generally all other data available from the site is below the PPV of these shots, most well below. Trapper proposes to remove the seismic monitoring unit as L-Pit continues to move away from the site for the remainder of the mine life. The current closest shots are now in excess of 2,400 feet from 5MF948. Revised page 3-32 is included reflecting the request to end monitoring.

Date	Tran PPV	Vert PPV	Long PPV	Mic Peak (dB)
9-19-2019	1.012	0.795	0.594	114.9
10-17-2019	0.994	1.021	0.605	117.7
8-13-2019	0.869	0.685	0.804	119.3
8-18-2020	0.677	0.511	0.798	102.9
9-24-2019	0.518	0.489	0.582	109.6

The Following Enclosed Permit Pages are Modified

iv-4, iv-5
3-15a to 3-15d
3-32
3-37 to 3-39
3-43b to 3-43c
4-186a, Table 4.8-6
4-190a, Table 4.8-7

The following Enclosed Appendix Materials are Modified or Added:

Appendix B: Replace cover page and text pages 1-11 with PR-12 hydrology updates. Replace Attachment 2 with new hydrology evaluation, and replace Flume Gulch Post Mine Hydrology SedCad run.

Appendix Q: Updated Sections I (West Buzzard hydrologic model) and II (East Buzzard hydrologic model) information. Updated as-built drawings for East Buzzard #3 and West Buzzard #3 and #4.

Appendix X: Added Agapito Associates Inc., study on top down HWM analysis, place behind existing study in appendix.

The Following Enclosed Permit Maps are Modified

- M4, Sheet 1, new mining
- M4A, Sheet 1, new mining
- M9, Sheets 1-3, updated haul routes
- M10A, Sheets 1 and 3 , new/revised mining limits
- M10B, Sheets 1 and 3, new/revised mining limits
- M-12, Sheets 2 and 3, revised PMT L and N-Pit
- M-14, Sheets 1 and 2, revised profiles, replace map set
- M-14A, Sheets 1-4, revised profiles for new PMT, replace map set

Please contact me if you have any questions or concerns with the initial review of this document.

Sincerely,



Graham Roberts
Environmental Supervisor

GCR
[PR12cl.doc]

Encl
c BLM Little Snake Field Office, w/enc