

**STATE OF
COLORADO****Wein - DNR, Clayton <clayton.wein@state.co.us>**

McClane Canyon Mine, C-1980-004, TR-20 Preliminary Adequacy Review

1 message

Wein - DNR, Clayton <clayton.wein@state.co.us>
To: joe <joe@ridgerunnergeo.com>

Tue, Oct 29, 2024 at 11:56 AM

Good morning Joe,

Attached is the Division's Preliminary Adequacy Review Letter for the McClane Canyon Mine's Technical; Revision No. 20. Please feel free to contact me if you have any questions or concerns.

Sincerely,
Clayton Wein
Environmental Protection Specialist

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

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C-004 TR-20 Preliminary Adequacy Review Letter.pdf
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October 29, 2024

Joe Brinton
Ridge Runner Consulting, LLC
652 Peony Dr.
Grand Junction, CO 81507

**RE: McClane Canyon Mine, Permit No. C-1980-004
Technical Revision No. 20 Preliminary Adequacy Review**

Dear Mr. Brinton,

The Colorado Division of Reclamation, Mining and Safety (the Division) received ARC McClane Canyon, LLC's (AMC) application for a technical revision on September, 2024. The application was deemed complete on September 19, 2024. The Division has completed an initial review of the TR-20 application and has the following adequacy questions:

1. The application submittal package included information regarding the proposed activities associated with the new sediment drying pile design. The text submitted referenced the Rules in which the proposed activities would comply with. There were no proposed revised pages submitted with the application incorporating this information into the existing Permit Application Package (PAP). Section 2.0-General Description of Mining Operations and Section 3.0-Reclamation Plan of the current PAP should be updated with the new information for the activities proposed under TR-20. References in the proposed text Sections should be included to direct the reader to the relevant Appendixes and Figures in which TR-20 also include. **Please provide the Division with proposed revised pages that includes the relevant information from TR-20 into the existing PAP text Sections and Appendixes.**
2. The Application refers to the new facility as a sediment drying pile and as a waste pile. Please verify if the new proposed pile will be utilized as a sediment drying pile, as a waste pile, or a combination of both. All proposed text should refer to the new facility as one or the other. **If the facility is to be used as only a sediment drying pile, please prove and verify that all material removed from the sediment pond during cleaning is non-acid generating or toxic generating material.**
3. The application submittal package included new maps and figures showing the proposed design of the new sediment drying pile configuration. The proposed maps and figures should be included in either; existing PAP Appendixes and Figures, or in new



proposed appendixes and Figures to be added to the current PAP when the application is approved. **Please submit new Appendixes, Maps and Figures that are named with the current Appendixes and Figure nomenclature from the current PAP.**

Operations Plan – Rule 2.05.3

4. The proposed location for the sediment drying pile is the current approved construction materials/subsoil pile. The proposed Maps and Figures verify the location will be used. The new pile design enlarges the existing pile design. Application Figure 1.0 stated that the pile is designed to hold 1,765 cubic yards of material. The application needs to include the acreage footprint for the new pile design. The new design of the pile is larger than the existing construction materials pile and needs to account for any additional surface disturbance that will occur. **Please provide in the proposed PAP Text, Appendixes, and Figures, the acreage footprint of the new pile design.**

5. The polygon for the sediment drying pile on the proposed figure 1.0 is larger and a different configuration than on the Map provided with the application titled “McClane New Waste Pile”. **Please revise the map to include the same proposed pile design as Figure 1.0**

6. The application text, maps and figures do not show how the sediment drying pile will be accessed to place material on it. Will there be an access road constructed? If so;

6a. Please include in the proposed revised pages text that refers to the proposed access road design with the road location, construction and reclamation activities that will occur (i.e. Appendixes and Figures containing further information on the access road). The road must have the topsoil salvaged and stored in an appropriate location as required by the Rules.

6b. Please include the proposed access road location and design on any necessary Figures and Appendixes to be incorporated into the PAP.

Topsoil – Rule 2.05.3(5)

7. With the increased footprint of the sediment drying pile and the access road, all topsoil from these footprints must be properly salvaged and stored according to the requirements of Rule 2.05.3(5). **Please include text within the operations plan discussing the procedures of topsoil removal and where the resource will be stored for reclamation.**

8. The Proposed Figure 1.0 cross section indicates that the toe of the topsoil stockpile and the toe of the sediment drying pile will be directly adjacent to each other. Topsoil Resources must be separated from other surface facilities to prevent the loss of topsoil resource and/or contamination of the topsoil resource. The perimeter ditch existing for

the current topsoil pile must remain in place. **Please revise Figure 1.0 to show that the perimeter ditch for the topsoil stockpile is independent from the proposed sediment drying pile.**

Protection of the Hydrologic Balance – Rule 2.05.6(3)

9. Additional information on how the new sediment drying pile will control precipitation runoff must be incorporated in the permit via proposed revised text for PAP Sections 2.0 and 3.0 along with any accompanying Appendixes and/or Figures. Information about containment berms, sumps and any other proposed sediment control features must be included. All surface disturbances must control runoff through sediment control features to prevent off-site impacts. **Please include information on what sediment control structures will be proposed to be implemented with TR-20.**

9a. Please update Figure 2.2-3 with the new sediment control features.

9b. Please include a schematic of a sump design for any proposed new sediment control feature for the PAP.

This concludes the Division's Preliminary Adequacy Review for the McClane Canyon Mine's TR-20. Please provide the Division with responses to this adequacy letter or request an extension to the Decision Date by Monday November 11, 2024. If you have any questions or concerns please feel free to contact me.

Sincerely,



Clayton Wein
Environmental Protection Specialist
clayton.wein@state.co.us

cc: Travis Marshall, Senior Environmental Protection Specialist DRMS GJFO