

December 3, 2024

Bridget Wade Bureau of Land Management Tres Rios Field Office

RE: Sunday Mine Complex (Sunday Mine, Carnation Mine, St. Jude Mine, Topaz Mine, West Sunday Mine), Permit Nos. M-1977-285, M-1977-416, M-1978-039-HR, M-1980-055-HR, M-1981-021, 2024 Reclamation Cost Estimate Update, Request for Concurrence

Dear Ms. Wade,

On November 13, 2024 the Division of Reclamation, Mining and Safety (Division) and the Bureau of Land Management (BLM) inspected the above mentioned sites, collectively referred to as the Sunday Complex. As a result of that inspection a Reclamation Cost Estimate update was performed to ensure the Financial Warranty adequately reflects the actual current costs of fulfilling the requirements of the approved reclamation plan. The resulting calculations will result in a Notice of Surety Increase and are displayed in the table below. All cost summary sheets are enclosed with this letter for your reference.

Site Name	Permit No.	Current Financial Warranty	2024 Updated Financial Warranty Required
Sunday Mine	M-1977-285	\$330,242.00	\$523,126.00
Carnation Mine	M-1977-416	\$40,245.00	\$54,849.00
St. Jude Mine	M-1978-039-HR	\$69,828.00	\$108,830.00
Topaz Mine	M-1980-055-HR	\$99,893.00	\$162,630.00
West Sunday Mine	M-1981-021	\$85,036.00	\$126,940.00

Per our memo of understanding prior to sending out Surety Increase notifications, the Division needs a letter of concurrence from the Bureau of Land Management. Please submit a letter by Wednesday, December 18, 2024. If no comments are received then the Division will consider the request approved and notify the operator.

If you require additional information, or have questions or concerns, please feel free to contact me. Direct Contact can be made at the Division's Grand Junction Field Office, by phone at 303-919-2997 or by email at lucas.west@state.co.us.

Sincerely,

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Lucas West Environmental Protection Specialist Division of Reclamation, Mining and Safety

Ec: Travis Marshall, DRMS



Task description: Cost Su		Cost Summary					
Site: Sunday Mine		Pe	mit Action: 2024 Up	date Permit/Jo	Permit/Job#: <u>M1977285</u>		
PROJECT	IDENTIFIC	ATION					
Task #: Date:	000 11/25/2024	State: County:	Colorado San Miguel	Abbreviation: Filename:	None M285-000		
User:	LJW						

Agency or organization name: DRMS

TASK LIST (DIRECT COSTS)

Task	Description	Form Used	Fleet Size	Task Hours	Cost
001	Demolition of structures, underground or onsite disposal	DEMOLISH	1	80.00	\$35,408
002	Portal closure (backfilling)	MINESEAL	1	40.00	\$31,106
003	Downhill dozing of waste dump	DOZER	2	33.29	\$31,619
004	Rough grading on top of pad and against cut face	DOZER	2	70.06	\$66,541
005	Lateral dozing of dump face	DOZER	2	12.99	\$12,337
006a	Demo Vent Fan S-1	DEMOLISH	1	36.00	\$1,366
006b	Vent Shaft Closure S-1	MINESEAL	1	16.00	\$4,218
007a	Demo Vent Fan S-2	DEMOLISH	1	36.00	\$1,366
007b	Vent Shaft Closure S-2	MINESEAL	1	16.00	\$4,218
008a	Demo Vent Fan S-3	DEMOLISH	1	36.00	\$1,366
008b	Vent Shaft Closure S-3	MINESEAL	1	16.00	\$4,218
009a	Demo Vent Fan S-4	DEMOLISH	1	36.00	\$1,366
009b	Vent Shaft Closure S-4	MINESEAL	1	16.00	\$4,218
010a	Demo Vent Fan S-7	DEMOLISH	1	36.00	\$1,366
010b	Vent Shaft Closure S-7	MINESEAL	1	16.00	\$4,218
011a	Demo Vent Fan S-8	DEMOLISH	1	36.00	\$1,366
011b	Vent Shaft Closure S-8	MINESEAL	1	16.00	\$4,218
012a	Demo Vent Fan S-15	DEMOLISH	1	36.00	\$1,366
012b	Vent Shaft Closure S-15	MINESEAL	1	16.00	\$4,218
014	Rip (older) vent shaft roads	RIPPER	1	1.59	\$773
015	Rip new vent shaft pads	RIPPER	1	1.69	\$819
016	Rip new vent shaft roads	RIPPER	1	3.58	\$1,737
017	Rip (older) vent shaft pads	RIPPER	1	1.69	\$819
018	Rip portal pad and dump areas	RIPPER	2	4.05	\$3,932
019	Grade new vent shaft roads	DOZER	1	2.23	\$1,060
020	Grade (older) vent shaft roads	DOZER	1	1.10	\$523
021	Grade (older) vent shaft pads	DOZER	1	1.40	\$664
022	Grade (older) vent shaft pads	DOZER	1	1.40	\$664
023	Spread topsoil on pad	DOZER	1	1.37	\$649
024	Haul low grade ore underground	LOADER	2	376.07	\$66,013
025a	Remove Operational Soils from lined ore pad, fold up liner	EXCAVATE	1	0.85	\$441
025b	Load and carry liner into underground workings	TRUCK1	1	1.44	\$843
025c	Grade out material from deconstructed ore pad	DOZER	1	0.77	\$365
026	Revegetate (older) vent shaft pads and vent roads	REVEGE	1	8.00	\$4,739
027	Revegetate new vent shaft pads and vent roads	REVEGE	1	16.00	\$7,701
028	Revegetate "affected area" at portal pad and dump	REVEGE	1	36.00	\$65,164
029	Haul reclamation equipment to and from site	MOBILIZE	1	9.20	\$13,015

		<u>SUBTOTALS:</u>	1068	.77	\$386,020
INDIRECT COSTS					I
OVERHEAD AND PROFIT:					
Liability insurance: 2.02 Performance bond: 1.05 Job superintendent: 534.39			Total = Total = Total =	\$4,	798 053 2,361
Profit: 10.00	FRACT	TOTAI AMOUNT (direct +	Total = 2 O & P =	\$38 \$92	3,602
LEGAL - ENGINEERING - PROJECT MANAGEMEN	Г:				
Financial warranty processing (legal/related costs): Engineering work and/or contract/bid preparation: Reclamation management and/or administration:	\$0 4.25 5.00		Total = Total =),350 3,942
CONTINGENCY:	0.00		Total =	\$0	
		TOTAL INDIRECT	T COST =	\$13	37,106
TOTAL BO	OND AN	MOUNT (direct + in	ndirect) =	\$52	23,126

Та	isk descrip	otion:	Cost Summary						
Site:	Carnatio	n Mine	Pe	Permit Action: 2024 Update			Permit/Job#: <u>M1977416</u>		
<u>PR</u>	OJECT	IDENTIFIC	ATION						
	Task #:	000	State:	Colorado		,	Abbreviation:	None	
	Date:	11/26/2024	County:	San Migue	1	_	Filename:	M416-000	
	User:	LJW							
	Age	ency or organiz	zation name: DF	RMS					
	0	5 0							
TA	SK LIST	Γ (DIRECT (<u>COSTS)</u>						
					Form	Fleet	Task		-
Task	Descrip	otion			Used	Size	Hours	Cost	
001		losure (backfi	lling)		MINESEAL	1	24.00	\$30,625	
002	Grading	a nad and shou	ilder of dump		DOZER	1	2.09	\$1.010	

		<u>SUBTO</u>	DTALS:	58.96	\$44,132
005	Haul reclamation equipment to and from site	MOBILIZE	1	6.00	\$3,355
004	Revegetate 3.1 acre disturbance	REVEGE	1	24.00	\$7,748
003	Ripping compaction on mine roads and dumps	RIPPER	1	2.87	\$1,394
002	Grading pad and shoulder of dump	DOZER	1	2.09	\$1,010
001	Portal closure (backfilling)	MINESEAL	1	24.00	\$30,625

INDIRECT COSTS

OVERHEAD AND PROFIT:

Liability insurance:	2.02	Total =	\$891
Performance bond:	1.05	Total =	\$463
Job superintendent:	29.48	Total =	\$2,337
Profit:	10.00	Total =	\$4,413
		TOTAL O & $P =$	\$8,105
		CONTRACT AMOUNT (direct + O & P) =	\$52,237

LEGAL - ENGINEERING - PROJECT MANAGEMENT:

Financial warranty processing (legal/related costs): Engineering work and/or contract/bid preparation:	\$0 0.00	Total = Total =	<u>\$0</u> <u>\$0</u>
Reclamation management and/or administration:	5.00		\$2,612
CONTINGENCY:	0.00	Total =	\$0
		TOTAL INDIRECT COST =	\$10,717

TOTAL BOND AMOUNT (direct + indirect) = ____\$54,849

Т	ask descrip	otion:					
Site:	St Jude N	Aine	Per	mit Action:	2024 Update	Permit/Job	o#: <u>M1978039HR</u>
<u>P1</u>	Task #: Date:	IDENTIFICAT 000 11/26/2024 LJW	TION State: County:	Colorado San Miguel			None M039-000

Agency or organization name: DRMS

TASK LIST (DIRECT COSTS)

Task	Description	Form Used	Fleet Size	Task Hours	Cost
001	Demolish onsite structures; underground or surface disposal	DEMOLISH	1	40.00	\$11,833
002a	Remove Operational Soils from lined ore pad, fold up liner	EXCAVATE	1	0.75	\$389
002b	Load and Carry liner underground for disposal	TRUCK1	1	0.74	\$431
002c	Grade out material from deconstructed Ore Pad	DOZER	1	0.38	\$180
003a	Demo Vent Fan SJ-1	DEMOLISH	1	36.00	\$1,366
003b	Vent Shaft Closure SJ-1	MINESEAL	1	16.00	\$4,218
004	Portal closure (backfill and recontour)	MINESEAL	1	24.00	\$13,606
005	Grade waste dump (DRA), pad and portal areas	DOZER	1	21.39	\$10,157
006	Rip compaction on pad and Roads	RIPPER	1	5.63	\$2,732
007	Carry topsoil to pad for spreading	LOADER	1	11.57	\$1,016
008	Spread topsoil on pad areas	DOZER	1	2.84	\$1,347
009	Grade access road	DOZER	1	0.52	\$247
010	Revegetate disturbed areas	REVEGE	1	24.00	\$25,377
011	Haul reclamation equipment to and from site	MOBILIZE	1	10.00	\$11,974
		<u>SUBTO</u>	TALS:	193.82	\$84,873

INDIRECT COSTS

OVERHEAD AND PROFIT:

Liability insurance:	2.02	Total =	\$1,714
Performance bond:	1.05	Total =	\$891
Job superintendent:	96.91	Total =	\$7,682
Profit:	10.00	Total =	\$8,487
		TOTAL O & P =	\$18,775
		CONTRACT AMOUNT (direct + O & P) =	\$103,648

LEGAL - ENGINEERING - PROJECT MANAGEMENT:

Financial warranty processing (legal/related costs): Engineering work and/or contract/bid preparation: Reclamation management and/or administration:	0.00	Total = Total =	\$0 \$0 \$5,182
CONTINGENCY:		Total =	
	Т	OTAL INDIRECT COST =	\$23,957

TOTAL BOND AMOUNT (direct + indirect) = _____\$108,830

Task description: Co		Cost Summary						
Site: Topaz Mine		Per	Permit Action: 2024 Update		Permit/Job#: <u>M1980055HR</u>			
-	000 11/27/2024	ATION State: County:	Colorado San Miguel	l	Abbreviation: Filename:	None M055-000		

Agency or organization name: DRMS

TASK LIST (DIRECT COSTS)

Task	Description	Form Used	Fleet Size	Task Hours	Cost
001a	Demo of Vent Fan T-1	DEMOLISH	1	36.00	\$1,366
001b	Vent Shaft Closure T-1	MINESEAL	1	16.00	\$4,218
002a	Demo of Vent Fan T-4	DEMOLISH	1	36.00	\$1,366
002b	Vent Shaft Closure T-4	MINESEAL	1	16.00	\$4,218
003a	Demo of Vent Fan T-5	DEMOLISH	1	36.00	\$1,366
003b	Vent Shaft Closure T-5	MINESEAL	1	16.00	\$4,218
004	Demolition of structures at portal and pad, onsite disposal	DEMOLISH	1	36.00	\$4,145
005	Install atmospheric bulkhead underground	MINESEAL	1	16.00	\$5,247
006	Portal closure	MINESEAL	1	40.00	\$10,212
007	Recontour Vent Access Roads	DOZER	1	1.56	\$743
008	Rip compaction on vent pad areas	RIPPER	1	2.99	\$1,443
009	Grade vent pad areas	DOZER	1	6.14	\$2,916
010	Revegetate vent pad areas	REVEGE	1	8.00	\$1,472
011	Rip compaction on vent roads	RIPPER	1	3.72	\$1,802
012	Grade vent access roads	DOZER	1	3.13	\$1,485
013	Revegetate vent access roads	REVEGE	1	8.00	\$4,373
014	Grade dump slopes, push up to 2:1	DOZER	2	17.12	\$16,261
015	Grade dump pad, push against cut face	DOZER	2	14.59	\$13,862
016	Rip compaction on waste dump pad and access road	RIPPER	1	11.26	\$5,432
017	Contour portal and cut face, shape pad	DOZER	1	7.67	\$3,643
018	Haul topsoil for placement	LOADER	2	10.60	\$2,309
019	Spread topsoil on contoured waste dump pad	DOZER	1	2.34	\$1,112
020	Close and seal water quality monitoring wells	BOREHOLE	1	30.00	\$584
021	Grade and contour access roads	DOZER	1	2.68	\$1,274
022	Recontour upland diversions and runoff catchments	DOZER	1	0.36	\$169
023	Revegetate waste dump, access road, and SWMPs	REVEGE	1	20.00	\$23,023
024	Haul reclamation equipment to and from site	MOBILIZE	1	7.00	\$4,521
		<u>SUBTO</u>	TALS:	405.16	\$122,780

INDIRECT COSTS

OVERHEAD AND PROFIT:

Liability insurance: 2.02

Performance bond:	1.05	Total =	\$1,289
Job superintendent:	202.58	Total =	\$16,059
Profit:	10.00	Total =	\$12,278
		TOTAL O & P =	\$32,106
		CONTRACT AMOUNT (direct + O & P) =	\$154,886

LEGAL - ENGINEERING - PROJECT MANAGEMENT:

Financial warranty processing (legal/related costs):	\$0	Total =	\$0
Engineering work and/or contract/bid preparation:	0.00	Total =	\$0
Reclamation management and/or administration:	5.00		\$7,744
CONTINGENCY:	0.00	Total =	\$0
	\$39,850		
TOTAL BO	\$162,630		

Task description: Co		Cost Summary				
Site: West Sunday		Per	mit Action: 2024 Update	Permit/Job	#: <u>M1981021</u>	
PROJECT Task #: Date: User:	12/3/2024	ATION State: County: 	Colorado San Miguel		None M021-000	

Agency or organization name: DRMS

TASK LIST (DIRECT COSTS)

Task		Form	Fleet	Task	
Task	Description	Used	Size	Hours	Cost
001	Demo Vent Fan WS-1	DEMOLISH	1	36.00	\$1,366
001b	Vent Shaft Closure WS-1	MINESEAL	1	16.00	\$4,218
002a	Demo Vent Fan WS-2	DEMOLISH	1	36.00	\$1,366
002b	Vent Shaft Closure WS-2	MINESEAL	1	16.00	\$4,218
003a	Demo Vent Fan WS-3	DEMOLISH	1	36.00	\$1,366
003b	Vent Shaft Closure WS-2	MINESEAL	1	16.00	\$4,218
004	Demolition of onsite structures, and disposal	DEMOLISH	1	48.00	\$14,619
005	Install atmospheric bulkheads underground	MINESEAL	1	32.00	\$5,247
006a	Remove Operational Soils from lined ore pad, fold	EXCAVATE	1	0.75	\$389
	up liner				
006b	Load and Carry liner underground for disposal	TRUCK1	1	0.76	\$443
006c	Grade out material from deconstructed Ore Pad	DOZER	1	0.38	\$180
007	Portal closure	MINESEAL	1	20.00	\$8,024
008	Grade dumps slopes, pad and portal areas	DOZER	1	16.55	\$7,860
009	Rip pad area of dump	RIPPER	1	3.47	\$1,684
010	Grade vent shaft and air hole areas	DOZER	1	3.88	\$1,844
011	Carry topsoil to be spread on pad	LOADER	1	9.17	\$805
012	Spread topsoil on pad	DOZER	1	1.91	\$908
013	Rip road areas	RIPPER	1	1.53	\$741
014	Revegetate all disturbed areas	REVEGE	1	32.00	\$25,877
015	Haul reclamation equipment to and from site	MOBILIZE	1	8.00	\$9,826
		TALS:	334.4	\$95,199	

INDIRECT COSTS

OVERHEAD AND PROFIT:			
Liability insurance:	2.02	Total =	\$1,923
Performance bond:	1.05	Total =	\$1,000
Job superintendent:	167.20	Total =	\$13,254
Profit:	10.00	Total =	\$9,520
		TOTAL O & P =	\$25,696
		CONTRACT AMOUNT (direct + O & P) =	\$120,895
I EGAL - ENGINEERING - PR			

LEGAL - ENGINEERING - PROJECT MANAGEMENT:

Financial warranty processing (legal/related costs):	\$0	Total =	\$0
Engineering work and/or contract/bid preparation:		Total =	\$0

Cost Summary Worksheet Cont'd	Task ≢	# 000		Page 2 of 2
Reclamation management and/or administra	tion:	5.00		\$6,045
CONTINGEN	VCY:	0.00	Total =	\$0
			TOTAL INDIRECT COST =	\$31,741
ΤΟΤΑ	\$126,940			