



STATE OF  
COLORADO

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## McClane Canyon Mine, C-1980-004, TR-20 2nd Adequacy Review

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Wein - DNR, Clayton <clayton.wein@state.co.us>

Fri, Jan 10, 2025 at 1:13 PM

To: joe <joe@ridgerunnergeo.com>

Good afternoon Joe,

Attached is the Division's 2nd Adequacy Review Letter for the McClane Canyon Mine's TR-20. Please feel free to contact me if you have any questions or concerns.

Sincerely,

**Clayton Wein**

**Environmental Protection Specialist**



**COLORADO**  
Division of Reclamation,  
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**C-004 TR-20 Second Adequacy Review Letter\_CCW.pdf**

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January 10, 2025

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 Second Adequacy Review**

Dear Mr. Brinton,

The Colorado Division of Reclamation, Mining and Safety (the Division) received ARC McClane Canyon, LLC's (AMC) responses to the Divisions PAR letter on December 30, 2024. The Division has completed reviewing the adequacy responses 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. Section 2.05.4 and Section 3.0 of Volume I contain the Reclamation Plan of the current PAP. These sections should be updated with the new information for the reclamation of activities proposed under TR-20. References in the proposed text should be included to direct the reader to the relevant Figures in which TR-20 also includes. **Please provide the Division with proposed revised pages that includes the relevant information from TR-20 into the existing PAP text Section 2.05.4 and Section 3.0.**

1a. Figures 3.1-1 and 3.1-2 need to be updated with the current on-the-ground conditions and include the activities proposed under TR-70. The current Figures are configured with the activities approved under PR-2. Since no activities approved under PR-2 have been started or completed, the current mine site configuration should be used instead. **Please provide the Division with updated versions of Figures 3.1-1 and 3.1-2.**

2. Adequacy Item No. 2 has been satisfied. The Division has no further comments for Item No. 2.

3. The adequacy review responses included revised figures showing the proposed design of the new sediment drying pile configuration, light use road and sediment control



features. The proposed figures should be included in either; existing PAP Figures, or as new proposed Figures to be added to the current PAP when the application is approved.

3a. The submitted Figure 1.0 should be renamed. Figure 1.0 already exists in the PAP as the Soils Map. The Figure could be included in the 2.2 sections of Figures. **Please include the figure in the section of Figures 2.2, the next available Figure is 2.2-8.**

3b. The submitted Figure 1.1 should be renamed. Figure 1.1 exists in the Current PAP as the Site Location Map. **Please include the figure in the section of Figures 2.2. Since this map is a zoomed in version of the submitted Figure 1, Figure 2.2-8a could be used.**

#### **Operations Plan – Rule 2.05.3/Reclamation Plan Rule 2.05.4**

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.**

4a. Materials submitted with the adequacy responses provided the acreage of the increased sediment drying pile (0.1 acres). **Does the acreage included in the revised submittal materials account for the new light use road?**

5. The adequacy responses provided revised figures with consistent sediment drying pile layouts. The Division considers Adequacy Item No. 5 to be Satisfied.

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 reclamation activities that will occur for the proposed light use road.**

6b. The adequacy responses provided have satisfied Adequacy Item No. 6b.

#### **Topsoil – Rule 2.05.3(5)**

7. The Adequacy responses provided have satisfied Adequacy Item No. 7.

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.**

8a. The revised version of Figure 1.0 submitted with the adequacy responses included a berm between the topsoil stockpile and the sediment drying pile. Currently on the ground conditions at the mine site have a perimeter ditch with a berm surrounding the topsoil pile and a separate perimeter ditch for the existing sediment drying pile. **Please revise the cross-sectional schematic on Figure 1.0 to reflect these features between the two piles.**

10. The current PAP Map 2.2-1 tracks all disturbances and affected acres at the McClane Canyon Mine. **Please update Figure 2.2-1 to include the new disturbed acreage for the activities proposed under TR-20.**

11. The Current PAP Figure 2.2-2, Surface Facilities, needs to be updated with the activities proposed under TR-20. **The Current PAP Figure 2.2-2 has the surface facility designs approved under PR-2. Please submit the revised Figure 2.2-2 with the mine site's current on the ground facility layout, with the TR-20 proposed activities.**

12. Proposed Revised text page p.26 in the first paragraph refers the reader to Figure 2.2-1 for the sediment pond and topsoil pile locations. Figure 2.2-1 tracks affected and disturbed acreages at the mine site. **Please revise p.26 to refer the reader to Figure 2.2-2, Surface facilities.**

13. The proposed Revised page p.32 refers the reader to Figure 1.1. **Please revise the text on p.32 to direct the reader to the new name of Figure 1.1 as requested in Adequacy Item No. 3b.**

#### **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 the current PAP Figure 2.2-3, Surface Water Control Systems, with the new sediment control features Proposed under TR-20. The Current PAP Figure 2.2-3 has the surface facility designs approved under PR-2. Please submit the revised Figure 2.2-3 with the mine site's current on the ground facility layout, with the TR-20 proposed activities.**

9b. a schematic for the sump design was included with the responses to the Preliminary Adequacy Review. The Figure was labeled Figure 2.2-3. Figure 2.2-3 exists in the current PAP. **Please revise the name of the Figure, Figure 2.2-3a is available.**

**14. Please provide the division with documentation to incorporate the new incised sump as a Small Area Exemption (SAE) for the subsoil stockpile into Appendix O of the PAP. Rules 4.05.6 and 4.05.9 must be met to allow the sump to be classified as a SAE. Please refer to Appendix O of Volume III for the previously approved SAE's for sumps at the McClane Canyon Mine.**

This concludes the Division's Second 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 Tuesday January 21, 2025. If you have any questions or concerns please feel free to contact me.

Sincerely,



Clayton Wein  
Environmental Protection Specialist  
[clayton.wein@state.co.us](mailto:clayton.wein@state.co.us)

cc: Travis Marshall, Senior Environmental Protection Specialist DRMS GJFO