



# TRAPPER MINING INC.

P.O. Box 187

Craig, Colorado 81626

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March 14, 2025

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

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*Re: Trapper Mining Inc., Permit No. C-1981-010*

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## **Permit Revision PR-12, Response to Division CIRCES Bond Estimate Review No. 1**

Dear Ms. Reilley:

Trapper Mine submitted PR-12 in October of 2024. During the final review period, the Division initiated a review of the CIRCES bond estimate. This estimate was an update on the bond estimate generated for PR-11 in November of 2022. Trapper assumes CIRCES unit costs were updated in July of 2023 and 2024, with the new estimate including these costs plus two technical revisions and their corresponding increases in bond liability. The new estimate is substantially higher than anticipated and warrants further review.

Upon a thorough review of the updated costs there appears to be a significant increase in several of the unit costs embedded within CIRCES. Trapper fully understands a customary cost increase accompanies these updated bond estimates; however, this cost increase is beyond the normal rate of inflation and historic cost increases experienced with other such actions. When directly comparing identical tasks and their sum within PR-11 to PR-12, the summary costs have risen nearly 19%. This exceeds the inflation rates of the past two years. Embedded within this rise there are several specific unit costs that appear to be driving the greatest increases in overall cost.

Trapper has highlighted some of the greatest increases and have presented them in a table (attached) representing increases between PR9 to PR-11 to PR12 of directly comparable unit cost. Some of the greatest costs are realized in the operating costs of dozers with a 50% increase in two years for D11's. There is also a corresponding increase of 36% for D10 dozers. Due to these large increases in dozer costs, fleet task unit costs are also affected at an increased inflation rate when compared to prior estimates. Trapper also found excessive cost increases in seeding, and demolition tasks with a 32 to 93% increase in costs associated with these varied tasks. Specific items are highlighted in the attached table.

Trapper respectfully requests these unit costs be re-evaluated for any errors or discrepancies, as they are not consistent with past increases of the same or similar tasks and equipment selections. These inconsistencies also call into question the validity of past CIRCES price updates and prior bond calculations. If these costs are correct within the bond-estimating tool, may we have a review of the accuracy of the data used to derive these costs?

Trapper also reviewed each CIRCES task and generated a list (attached) of specific input parameters that may be in error, or otherwise negatively affect task calculations resulting in a higher cost. Some of these items include visibility factors, slope and push distances in the efficiency correction factors. Other items noted are bucket and haulage equipment loading factors that may negatively affect volumes and efficiency in some truck/loader tasks.

Trapper understands a customary cost increase generally tied to typical inflationary rates from year to year. This has been realized in past CIRCES re-calculations and most task seem to exhibit this assumed increase. However, the overall increase of more than \$10,000,000 in this estimate is unexpectedly high and warrants review as it puts an undue hardship on the operator when assuming and budgeting for bond liability premium costs. Trapper also requests this estimate satisfy the required upcoming mid-term review and subsequent bond re-calculation for the site.

We look forward to continuing to review and rectify this issue with the Division. Please get back to us with any questions, comments or concerns.

Sincerely,

A handwritten signature in dark ink, appearing to read "Graham Roberts", with a long horizontal flourish extending to the right.

Graham Roberts  
Environmental Supervisor  
Trapper Mining Inc.





PR-12	<b><u>Rangeland with Shrubs: (Above 6700')</u></b>		
	Total Tilling Cost/Acre	\$ -	#DIV/0!
	Total Seed Mix Cost/Acre	\$ 684.99	93%
	Total Seed Application Cost/Acre	\$ 236.64	2%
	Total	\$ 921.63	57%
	<b><u>Rangeland without Shrubs: (below 6700')</u></b>		
	Total Tilling Cost/Acre	\$ -	#DIV/0!
	Total Seed Mix Cost/Acre	\$ 124.23	44%
	Total Seed Application Cost/Acre	\$ 236.64	2%
	Total	\$ 360.87	13%

	Maintanence Ponds, Drainages	Unit Cost/hr	Percent Change
PR-9	CAT324D L	192.69	
PR-11	CAT324D L	179.56	-7%
PR-12	CAT324D L	517.75	188%

	Seal Monitoring Wells	Cost/LF	Percent Change
PR-9	2-Dia	5.29	
	4-Dia	5.55	
	4.5-Dia	6.32	
	6-Dia	6.32	
	Task 122 Total (For Comparison)	103741	
PR-11	2-Dia	5.29	0%
	4-Dia	5.55	0%
	4.5-Dia	6.32	0%
	6-Dia	6.32	0%
	Task 122 Total (For Comparison)	108065	4%
PR-12	2-Dia	8.57	62%
	4-Dia	8.71	57%
	4.5-Dia	9.68	53%
	6-Dia	9.68	53%
	Task 122 Total (For Comparison)	168156	56%
	Demolition Task Removal Comparison	Total Task	Percent Change
PR-9	Task 130, Demolish Structures, remove mater, etc	717959	
	Task 131, Culvert Removal	122583	
PR-11	Task 130, Demolish Structures, remove mater, etc	788371	10%
	Task 131, Culvert Removal	127840	4%
PR-12	Task 130, Demolish Structures, remove mater, etc	1040527	32%
	Task 131, Culvert Removal	176564	38%