



STATE OF
COLORADO

Simmons - DNR, Leigh <leigh.simmons@state.co.us>

M2025003, Russell Gulch Reclamation Project, Initial Adequacy Review

1 message

Simmons - DNR, Leigh <leigh.simmons@state.co.us>
To: Greg Smith <gregorydavidsmith@gmail.com>

Fri, Mar 14, 2025 at 4:58 PM

Greg,

The initial adequacy review letter is attached.

Please request a suitable extension by email.

Let me know if you have any questions,
Leigh

Leigh Simmons
Environmental Protection Specialist



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

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M2025003_Application_AdequacyReview_1_wCPW.pdf
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COLORADO
Division of Reclamation,
Mining and Safety
Department of Natural Resources

Greg Smith
CRS LLC.
64 Hyland Dr Unit B
Evergreen, CO, 80439

March 14, 2025

**Re: Russell Gulch Reclamation Project Application (M-2025-003)
Initial Adequacy Review**

Dear Mr. Smith,

The Division has completed an initial review of the materials submitted with the Russell Gulch Reclamation Project 110d application. Comments are organized by rule citation. Please review the following comments and address the numbered items in bold.

Rule 6.3.2 Exhibit B - Site Description

1. No wildlife statement has been included in the application packet. However comments were received from Colorado Parks and Wildlife (CPW), and are attached to this letter.

Please update Exhibit B to acknowledge and address CPW comments.

Rule 6.3.3 Exhibit C - Mining Plan

2. Exhibit C describes in general terms the circuit that will be used to process the historic mine waste (feedstock).

Please expand Exhibit C considerably to provide more detail about the proposed processing circuit. (Include details about the number and size of trailers to be used, the number and volume of any tanks, process diagrams to show how the circuit will handle the material, details of the secondary containment of process water, how and where additives will be added to the system, where additives will be stored, where fluids/tools/parts for the machinery will be stored...) To the extent possible this information should be available to the public to view, but if certain details need to be made confidential, please identify them as such.

3. The Division understands that parts of the site may need to be cleared and levelled to provide an area to set up the circuit.

Please describe how the site will be prepared for the processing circuit. Please describe how existing vegetation will be put to beneficial use.



4. At the end of Exhibit B a brief discussion is made of how stormwater will be handled.

Please move this discussion to Exhibit C and expand it to fully describe what measures will be taken to minimize disturbance to the hydrologic balance, prevent off-site damage, and provide for a stable configuration of the reclaimed area consistent with the proposed future land use.

5. There are several historic waste piles on the site.

Please describe the sequence in which the various piles will be processed, and any additional equipment (e.g. mobile conveyors) that may be brought to the site to enable them to be processed.

Rule 6.3.4 Exhibit D – Reclamation Plan

6. Exhibit D must present a plan for how the site will be reclaimed. It may be revised in the future, but at any moment in time there must be a single approved reclamation plan (which will form the basis of a Reclamation Cost Estimate, used to calculate the required surety that the Division will hold).

Please revise the language in Exhibit D to remove ambiguity about the reclamation plan. Please specify any grading that will be required, describe any topsoil or fill material that will be imported (including its source), and give details of the site's final configuration.

7. The proposed text is vague about the need for revegetation during reclamation.

The site will need to be revegetated, please revise the text accordingly, and provide the seed mix to be used.

8. An unsubstantiated cost estimate of \$10,000 is provided in Exhibit D.

[This item is a placeholder for now, further comments on the cost estimate will be made later in the adequacy review process following clarification on aspects of the Mining and Reclamation Plans]

Rule 6.3(5) Exhibit E – Maps

9. **Please revise Exhibit E to provide two maps: Mine Plan Map and Reclamation Plan Map. The maps should be prepared to the basic requirements of Rule 6.2.1.(2), and**

provided at full scale, ideally as standalone documents. Both maps should clearly show the permit boundary and topographic contour lines. The Mine Plan Map should show all features described in Exhibit C, clearly labeled and at scale. The Reclamation Plan Map should show the post-mining topography, and all parcels where disturbed land will be reclaimed. If the road is to be retained as a permanent feature, please label it as such on the map.

Rule 6.3(6) Exhibit F - Other permits

10. Rule 6.3(6) states “Provide a statement identifying which of the following permits, licenses and approvals which are held or will be sought in order to conduct the proposed mining and reclamation operations: effluent discharge permits, air quality emissions permits, radioactive source materials licenses, disposal of dredge and fill material (404) permits, permit to construct a dam, well permits, explosives permits, State Historic Preservation Office clearance, highway access permits, U.S. Forest Service permits, Bureau of Land Management permits, county zoning and land use permits, and city zoning and land use permits.”

Please review and update Exhibit F, with particular attention to the need for a construction stormwater permit.

Rule 6.3(12) Exhibit L – Permanent Man-Made Structures

11. Virginia Canyon Road is within the permit area.

Pursuant to Rule 6.3(12)(c), please provide a notarized letter, from the owners of Virginia Canyon Road that the mining and reclamation activities, as proposed, will have “no negative effect” on the road, and that CRS LLC has right of entry to the road.

The decision due date for the Russell Gulch Reclamation Project application is March 16, 2025. Please request an extension to this date that will give you sufficient time to respond to this adequacy review, and for the Division to review your response.

Sincerely,

A handwritten signature in blue ink, appearing to read 'L. Simmons'.

Leigh Simmons
Environmental Protection Specialist

Attachment 1: CPW Letter



COLORADO

Parks and Wildlife

Department of Natural Resources

6060 Broadway
Denver, CO 80216
P (303) 291-7227 | F (303) 291-7114

Leigh D. Simmons
Division of Reclamation, Mining and Safety
1313 Sherman Street, Room 215
Denver, CO 80203
Leigh.Simmons@state.co.us
(720) 220-1180

RE: Russell Gulch Reclamation Project, File No. M-2025-003. Application to conduct a(n) Surface mining and reclamation operation, at or near Section 14, Township 14S, Range 73W, 06th Principle Meridian, in Gilpin County.

Ms. Simmons,

Thank you for the opportunity to review your application for the (110d) Operation Reclamation Permit for the Russell Gulch Reclamation Project. This project consists of removing 50,000 tons of existing mine waste (tailings). The existing tailings will be processed into a concentrate and a benign by product, both of which will be removed from the property.

Colorado Parks and Wildlife's (CPW) goal in responding to land use proposals such as this is to provide complete, consistent, and timely information to all entities who request comment on matters within our statutory authority.

CPW believes this project will, at a minimum, be wildlife neutral in its impacts to local wildlife populations. CPW recommends that during and after the reclamation process, efforts are made to reduce/minimize any and all erosion at the site and have in place a comprehensive invasive weed plan.

CPW also recommends that after the mining reclamation process is complete, that a minimum of 12 inches of clean fill with incorporated soil amendments (organics) be place over all disturbed areas. If the soil is acidic, CPW recommends adding amendments to neutralize the acidity. All disturbed areas should be revegetated with native grasses and forbs and covered with weed free straw and woody material. Efforts should also be made during the reclamation process to reduce/minimize any and all erosion.



Jeff Davis, Director, Colorado Parks and Wildlife
Parks and Wildlife Commission: Dallas May, Chair · Richard Reading, Vice-Chair · Karen Bailey, Secretary · Jessica Beaulieu
Marie Haskett · Tai Jacober · Jack Murphy · Gabriel Otero · Murphy Robinson · Ja
mes Jay Tutchton · Eden Vardy

CPW would be happy to assist in any further consultation regarding the impacts to wildlife as you move forward. Please contact Tim Woodward at (303) 829-2428 with any questions or concerns.

Sincerely,



Tim Woodward
District Wildlife Manager
Colorado Parks and Wildlife





Jeff Davis, Director, Colorado Parks and Wildlife

Parks and Wildlife Commission: Dallas May, Chair · Richard Reading, Vice-Chair · Karen Bailey, Secretary · Jessica Beaulieu
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