



April 24, 2025

Ron Hickman  
Climax Molybdenum Company  
P.O. Box 68  
Empire CO 80438

**Re: Climax Molybdenum Company; Henderson Mine, Henderson Mill, Permit No. M-1977-342, Technical Revision No. 38, Life of Mine Plan Update Adequacy Review**

Dear Mr. Hickman:

The Division of Reclamation, Mining and Safety (Division) reviewed the contents of Technical Revision 38 (TR-38) received on January 24, 2025, and submits the following comments.

1. In Attachment 3, the proposed pipe system includes a transition from a 60" diameter pipe to a 42" diameter pipe. The attachment should include a discussion regarding why the downgradient pipe is smaller. Was a hydraulic analysis performed to illustrate that the 42" pipe is sufficient? If so, it should be included in the attachment.
2. In Attachment 4, the Summary and Recommendations section should include additional discussion of the drain time. The text states that after a PMP event, it will take 65 days to drain the water and return the TSF pool to normal conditions. Please explain why this is acceptable and if this is based on DWR guidance or another standard.
3. The DWR document "Guidelines for the Use of Regional Extreme Precipitation Study (REPS) Rainfall Estimation Tools" states on page 1 that other DWR guidelines must be used in conjunction with this document. Please explain if/how the following documents were considered in the TR-38 analysis (and update Attachment 4, as appropriate):
  - Guideline for Hydrologic Hazard Analysis
  - Guideline for Comprehensive Dam Safety Evaluation (CDSE) Risk Assessment & Risk Informed Decision Making (RIDM).

This completes the Division's adequacy review. The decision date for TR-38 is May 24, 2025. If additional time is needed to address the adequacy items, please submit an extension request prior to the decision date. If you have any questions, please contact me at [nikie.gagnon@state.co.us](mailto:nikie.gagnon@state.co.us) or (720)527-1640.



Sincerely,

*Nikie Gagnon*

Nikie Gagnon

Environmental Protection Specialist

Ec: Miguel Hamarat, Climax Molybdenum  
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