



May 19, 2025

Micheal Murphy
Land Survey Advisors, LLC
296 Timber Lakes Est
Heber City, UT 84032

**Re: Crystal Vitoria Mine, File No. P-2025-004, Notice of Intent to Conduct Prospecting Operations,
Notice of Deficiency**

Dear Mr. Murphy,

The Division of Reclamation, Mining and Safety (Division) is in the process of reviewing the above referenced application in order to ensure that it adequately satisfies the requirements of the Colorado Mined Land Reclamation Act (Act) and the associated Mineral Rules and Regulations of the Mined Land Reclamation Board for Hard Rock, Metal and Designated Mining Operations (Rules). During review of the material submitted, the Division determined that the following issue(s) of concern shall be adequately addressed before a decision can be rendered.

Section I: General Information

1. The location information provided in Question 5 states that the location of the site is in multiple Qtr/Qtr section of multiple Qtr Sections of Section "PB37". Please provide the Public Land Survey System location for just the disturbance area of the NOI are in Qtr/Qtr, Qtr, Section, Township and Range.

Section III: Project Description

2. Question 3 states that approximately 5,000 tons of material will be extracted during the project. Please provide a narrative describing the anticipated makeup of that material as well as a plan on how the materials will be handled and or transported.
3. In Question 6, A there is one 25x25 ft mud pit listed in the surface disturbance, however that is not discussed in any other section nor shown on any maps. Please provide more information on the location, use and the reclamation of the mud pit.
4. Additionally, in Question 6, A it is stated that there will be 12 holes with 5,000 feet depth listed. Through conversations the Division interprets this to mean 5,000 feet of total depth spread out between the 12 holes. Please confirm that the 5,000 feet is a total depth of all 12 holes and provide an estimate of the average depth of each drill hole. Additionally, please provide information regarding the underground location of each drill hole and their approximate angle of drilling.
5. The application materials proposes that drill water will be absorbed into the water table for the underground drilling operations however cuttings management is not discussed. Please provide a narrative detailing the materials handling operations for the underground drilling portion of the project.
6. Question 6, D states that "rock dumps will also be limited to this same 1 acre area of disturbance." Please clarify if rock dumping on the surface is proposed as a part of the prospecting operation.



7. Question 6, E briefly discusses the Groundwater Monitoring holes that are proposed to be installed. Please provide a narrative supported by a drawing showing the elevational location of the wells compared to the underground workings and extent of the underground drilling operations ensuring that the depth of the monitoring wells is below the target exploration zone and potential mining area. Also, please provide a Water Quality Sampling and Analysis Plan with QA/QC measures and analyte sampling list (for Surface and Groundwater samples) for review to be carried out after the holes are completed. The sampling and analysis plan should also include well construction information and sampling protocols to be used in the monitoring program.

Section IV: Operation and Reclamation Measures

8. Questions 3 and 7, respectively discuss topsoil redistribution and revegetation, however based on the information contained within the application materials no disturbance requiring revegetation is proposed. Please clarify if topsoil replacement and revegetation will be required, and if so, please provide a detailed description of any equipment needed for topsoil replacement, seeding method, mulching (if needed), etc.
9. Question 4 states that "if deemed necessary, the drill holes will be plugged and abandoned during reclamation if they are making water." Please provide a specific Plugging and abandonment method should the underground drill holes encounter water. Please note that pursuant to Rule 5.4.2(1), any drill hole which evidences artesian flow of groundwater to the surface shall be plugged with neat cement grout, or a similar material sufficient to prevent such artesian flow, as approved by the office. Also, if water is encountered, please commit to ceasing the activity and contacting the Division immediately as a potential Modification to the NOI may be required.
10. Additionally, though the groundwater monitoring holes will remain open, a plugging and abandonment method must be submitted to be included in the Reclamation Cost Estimate. Please provide more information regarding the plugging and abandoning of the Groundwater Monitoring holes, and their estimated completion depth.
11. Based on the condition of the locking gate on the adit, the Division will include the replacement of the portal gate in the Reclamation Cost Estimate and required Financial Warranty. To supplement your response to Question 5, please provide the dimensions of the gate so that it may be included in the estimate.
12. A seed mix was provided in the application materials, however for operations on lands administered by the US Forest Service, a Forest Service approved seed mix must be used. Please contact the Forest Service Office ensure the seed mix provided is acceptable, if it is not, please submit a revised seed mix with seeding rate in PLS/Acre.

Please submit your responses to the above listed issues within 60 days of the date of this letter. Written responses should be received by the Division no later than Friday July 18, 2025. If you require additional time please submit a written Extension Request to the Office. If you have any questions, comments or concerns please feel free to contact me at the Division's Grand Junction Field Office, by phone at 303-919-2997 or by email at lucas.west@state.co.us.

Sincerely,

A handwritten signature in blue ink, appearing to read 'L West', with a long horizontal flourish extending to the right.

Lucas West

Environmental Protection Specialist

Division of Reclamation, Mining and Safety

CC: Travis Marshall, DRMS

EC: Cullen LaPointe, USFS