



Seneca Property, LLC
29515 Routt County Road 27
Oak Creek, CO. 80467

June 23, 2025

Ms. Robin Reilley
Division of Reclamation, Mining and Safety
1313 Sherman Street, Room 215
Denver, CO 80203-2273

RE: Seneca Yoast Mine; C-1994-082: Permit Renewal No. 6 (RN6) Adequacy Review Response

Dear Ms. Reilley,
Seneca Properties, LLC (SPL) has reviewed the adequacy review regarding RN6 and is providing the following responses:

Rule: 2.03.4 Identification of Interests

- 1) 2025 April DRMS: The information required by this Rule is located in Volume 1, Tab 3 portions of this information were updated in SO2 (2015), and RN4 (2017). DRMS finds this section of the permit adequate with the exception of the following:
 1. Please confirm to DRMS that the names and addresses of owners of record information of Appendix 3-2 dated 2017 remains current.
 - a. Appendix 3-2 has been updated and included with this submittal.
 2. Please confirm that the lists of Surface, Coal and Minerals Ownership etc, are up to date (Attachment 3-5).
 - a. Appendix 3-5 has been updated and included with this submittal.

Rule: 2.03.5 Compliance Information

- 2) 2025 April DRMS: The information required by this Rule is located in Volume 1, Tab 3 Appendix 3-6 of the Permit Application Package. DRMS finds this section of the permit adequate with the exception of the following:
 3. Please update page 3-6.1 to address the current permit term.
 - a. Page 3-6.1 has been updated and included with this submittal

Rule: 2.03.6 Right of Entry

- 3) The information required by this Rule is located in Volume 1, Tab 3. Appendix 3-4 of the Permit Application Package and comprises information regarding lease agreements, property deeds and right of way agreements. The permit area legal description is found in Appendix 3-1. Right of entry information was updated as per SO2 in December of 2015.

2025 April DRMS:

4. Please verify that the ownership and control information Attachment 3-4 of the current permit is up to date.
 - a. The ownership and control information remains up to date.
5. Please verify that Right of Entry (Appendix 3-4) information is up to date.
 - a. The Right of Entry Information remains current

Rule: 2.03.9 Insurance Information

- 4) **2025 April DRMS:** DRMS finds this section of the permit **adequate**. The information required by this Rule is located in Volume 1, Tab 3, Attachment 3-3. The DRMS document storage system stores annual insurance certificates for the site.
6. Please submit a current certificate of insurance for the site.
- a. Most recent insurance certificate is included with this submittal.

Rule: 2.03.12 Proof of Publication

- 5) **2025 April DRMS:** DRMS finds this section of the permit **adequate**, with the exception of the following:

DRMS is unaware that the permitting action has been published in the local newspaper. At the time of this writing, DRMS has not yet received the affidavit of publication.

7. Please provide the affidavit of publication.
- a. Affidavit of publication has been included with this submittal.

2.05.4 (2)(b) – Reclamation Cost Estimate

- 6) DRMS conducted a reclamation cost estimate for the site and found that the liability to reclaim the Yoast Mine to be \$737,413. The required surety and currently held surety is \$713,491.06. Given this, the bond held is less than the current costs of reclamation at this time and an increase in the reclamation bond of \$23,921.94 is necessary. Attached is a copy of the reclamation cost estimate conducted, including a Cost Summary, Task Summary and CIRCES task sheets.
8. Please procure a **\$23,921.94** increase to the currently held liability.
- a. An updated bond rider is in process and will be submitted to DRMS as soon as it is received.

Rule: 2.05. 6(2) Fish and Wildlife Plan

- 7) **2025 April DRMS:** DRMS finds this section of the permit adequate. with the exception of the following:
9. Please verify the Threatened and Endangered Species listed in Tab 11 - Fish and Wildlife Resources Information is up to date with the current list issued by Federal and State agencies in accordance with Rule 2.04.11(4).
- a. Table 13A and attachment 11-1A have been updated to show the Grey Wolf as likely to exist and experimental with in Colorado. Updated documents are included with this submittal.



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Rule 2.05.6(3) Mitigation of the Impacts of Mining Operations-Protection of Hydrologic Balance

10. Please provide a summary of the results of hydrologic monitoring and recent hydrologic reports. In this discussion make explain why or why not the probable hydrological consequences of the PAP are current and accurate.

- a. A summary of recent monitoring and reports in support of the current PHC has been included with this submittal.

If you have any questions or need additional information, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Miranda Kawcak". The script is cursive and fluid.

Miranda Kawcak
Environmental Manager
Peabody, Colorado Operations

Enclosures:

1. *Pages 2.03.3, 7, 8, & 15 Permit Text updates*
2. *Exhibit 3-1 Surface Ownership*
3. *Public Notice*
4. *Appendix 3-5 Company & Officer information*
5. *Appendix 3-2 Names & Addresses of Owners of record*
6. *Yoast Insurance COI*
7. *Attachment 11-1A, T&E Species*
8. *Affidavit of Publication*
9. *PHC Review*
10. *Table 13A TES Species Update*