



EXHIBIT T – ENVIRONMENTAL PROTECTION PLAN

(Rule 6.4.20, Colorado Mined Land Reclamation Board – Limited-Impact 110(d) Permit, Ajax 1 Claim, Clear Creek County, Colorado)

A. Regulatory Basis & Applicability

Rule 6.4.20 requires every **Designated Mining Operation (DMO)** to submit an Environmental Protection Plan (EPP) that demonstrates protection of human health, property, and the environment. Although the Ajax 1 activity **does not** meet the statutory definition of a DMO—no toxic / acidic chemicals are used or stored, and the single ore pile is verified non-acid-generating—the applicant elects to provide this Exhibit T voluntarily so that the Division can confirm rapid compliance with any potential DMO trigger now or in the future.

All commitments below either **meet or exceed** the performance standards in Rules 6.4.7 (surface water), 6.4.8 (erosion), 6.4.10 (chemical handling), and 6.4.20 (Environmental Protection Plan).

B. Project Synopsis

Item	Description
Activity	Removal and reclamation of one historic mine-waste stockpile; no new excavation.
Affected land	0.18 acre within unpatented Ajax 1 Lode Claim, Sections 14 & 23, T4S R74W (6th P.M.).
Duration	≤ 30 days of on-ground work in a single field season.
Chemicals on-site	None for extractive metallurgy; ≤ 100 gal diesel and 5 gal lubricants (mobile tanks only).
Material characterization	ABA tests (NAG pH 7.9, NPR 3.2) confirm waste rock is <i>non-acid-forming</i> and <i>non-metal-leaching</i>

















C. Materials Handling & Acid-Toxic Controls (*Rule 6.4.20-A*)

1. **Ore Pile Characterization** – Static ABA and TCLP metals analyses show net-neutralizing capacity; sulfur < 0.1 %.
2. **Removal Method** – Skid-steer loads waste into end-dump trucks; any material with sulfide streaks screened visually and, if encountered, segregated on a polyethylene-lined pad for confirmatory field pH; none expected.
3. **Pad Regrading** – Final slopes $\leq 3H:1V$; topsoil cover ≥ 4 in.; native seed mix.
4. **Documentation** – Chain-of-custody and laboratory certificates kept in the annual DRMS file.

D. Water-Quality Protection (*Rule 6.4.20-B*)

Measure	Implementation
Run-on Diversion	2 ft \times 1 ft rock-lined swale upslope at 2 % grade to bypass stormwater.
Sediment Controls	Twin silt-fence row + 12-in coir wattles on down-gradient edge; inspected after every ≥ 0.3 -in storm.
Surface-Water Baseline	Grab samples collected upstream & 50 ft downstream of pad one week prior to work; parameters: pH, EC, TSS, turbidity, dissolved Al/As/Cu/Fe/Pb/Zn.
Post-Disturbance Monitoring	Repeat sampling immediately after final grading and again at first snowmelt; identical suite.
Compliance Standard	Down-gradient turbidity ≤ 25 NTU above up-gradient during comparable flow; metals $\leq 2\times$ baseline or Colorado Class II aquatic-life standards, whichever is lower.

E. Storm-Water & Erosion Control (*Rules 6.4.7, 6.4.8, 6.4.20-C*)

- Temporary BMPs installed ahead of earthwork and retained until vegetative cover $\geq 70\%$.
- Slopes left roughened; wood-straw blanket on grades $> 20\%$.
- Disturbed track ripped 8 in deep, cross-ditched every 40 ft, and out-sloped 3 %.
- Inspections after every runoff event > 0.5 in or at least every 14 days; corrective action within 48 h.

F. Chemical & Fuel Management (Rule 6.4.10, 6.4.20-D)

- No cyanide, mercury, acids, or oxidants will be stored or used.
- Diesel in DOT-approved 110-gal slip tank mounted on service truck; secondary containment via 8 mil fuel mat.
- Equipment refueled > 100 ft from the seasonal drainage.
- Spill-response kit (100-lb absorbent, booms, PPE) on-site; spills > 5 gal reported to DRMS, CDPHE, and USFS within 24 h.

G. Air & Noise Management (Rule 6.4.20-E)

- All haul trucks tarped; loader operations limited to daylight.
- Water truck (250 gal) available for dust suppression if surface PM becomes visible > 200 ft.
- Generator < 20 kW meets EPA Tier 4f; operations 07:00–19:00 only; sound pressure < 55 dBA at claim boundary.

H. Wildlife & Habitat Mitigation (Rule 6.4.20-F)

- Work scheduled **outside** May 1 – July 15 migratory-nesting window; if schedule change is unavoidable, a qualified biologist will perform a nest survey 48 h prior to work.
- Slash or timber removal is not required; any incidental downed wood will be left for coarse woody debris.
- Revegetation seed mix matches USFS High-Altitude Native Blend; no agronomic species.



I. Cultural & Paleontological Resources (*Rule 6.4.20-G*)

- USFS Section 106 survey (Dec 2024) found no eligible sites in or within 200 ft of the disturbance.
 - If artifacts are discovered, work stops within 50 ft and USFS archaeologist is notified immediately (36 CFR 800).
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J. Monitoring & Reporting (*Rule 6.4.20-H*)

Aspect	Frequency	Parameters / Actions	Reporting
BMP inspections	Post-storm & bi-weekly	Integrity, sediment accumulation	Log sheets filed with annual DRMS report
Surface-water sampling	Baseline; post-grade; spring melt (Yr 1)	pH, EC, turbidity, TSS, dissolved metals	Results tabulated in annual report
Vegetation cover	End of each growing season (Yrs 1–3)	3× 100-ft line-intercept	> 80 % trigger for bond release
Fuel/chemical inventory	Daily during work	Volumes, transfers, spills	Included in close-out memo

K. Contingency & Corrective-Action Protocol (*Rule 6.4.20-I*)

1. **Water-Quality Exceedance** – Immediate resampling; if confirmed, deploy straw-bale check dam, flocculant socks; evaluate need for secondary containment or temporary settling basin.
 2. **Slope Failure (> 1 ft slump)** – Regrade, compact, re-apply erosion blanket within 72 h.
 3. **Spill (> 5 gal or outside containment)** – Contain, excavate impacted soil, place in sealed drums for off-site disposal; document on CDPHE Form PCS.
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4. **Wildlife Incident** – Cease work; contact CPW (303-291-7227) and USFS biologist; follow guidance.
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L. Assurance Statement

All measures in this Exhibit T **comply with or surpass** the requirements of Rule 6.4.20. Because no acid-generating or toxic materials are involved, and because the disturbance is < 1 acre, the Board may—under § 34-32-116.5(2) C.R.S.—determine that the Ajax 1 activity is not a Designated Mining Operation. Nonetheless, Candy Mountain Mining Company agrees to implement this Environmental Protection Plan in full so that the Division can process the application **expeditiously and without conditions**.

Kiel Schleusner Date: 7/2/2025

Kiel Schleusner

President, Candy Mountain Mining Company Inc.