



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

August 22, 2025

John Asselta
MILE HI ROCK AND MINERAL SOCIETY
13495 W. 71st Place
Arvada, CO 80004

**Re: Adequacy Review, 110(1) Hardrock Reclamation Permit Application
RAMS HOME, File No. M-2025-030**

Dear Mr. Asselta,

On July 16, 2025, the Division of Reclamation, Mining and Safety (Division) considered the MILE HI ROCK AND MINERAL SOCIETY Hardrock Limited Impact Operation 110(1) Reclamation Permit Application for the proposed RAMS HOME operation complete for filing. The Division has completed a technical review of the application and has identified the following inadequacies. Please respond to this Adequacy Review with the requested information and summarize each response to the numbered items below, in a cover letter titled “Adequacy Review Response; M-2025-030”.

The Division is required to make an approval or denial decision on the application no later than **August 30, 2025**; therefore, a response to the following adequacy review concerns should be submitted to the Division as soon as possible. If more time is needed to complete the reply, the Division can grant an extension of this decision date if the request is received no later than the currently set decision date.

The review consisted of comparing the application content with specific requirements of Rules 1, 3, 6.1, 6.2, and 6.3 of the Mineral Rules and Regulations of the Colorado Mined Land Reclamation Board for Hard Rock, Metal, and Designated Mining Operations. Any inadequacies are identified under the respective exhibit heading.

GENERAL APPLICATION PROCEDURES

1. As required by Rule 1.6.2, please submit proof of publication in a newspaper of general circulation in the locality of the proposed mining operation.
2. As required by Rule 1.6.2, please submit proof of the notice to all owners of record of surface and mineral rights of the affected land and the owners of record of all land surface within 200 feet of the boundary of the affected land. Proof of notice may be return receipts of a Certified Mailing or by proof of personal service.
3. To date, the Division has received one agency comment letter regarding the application. The Colorado Parks & Wildlife comment letter is attached for your review. Please acknowledge and address any comments noted in the letter and make changes to the application as necessary.

EXHIBIT B – Site Description (Rule 6.3.2)

4. Within Exhibit B – Site Description, you have identified the #43 Sphinx gravelly coarse sandy loam and #46 Sphinx-Rock outcrop complex as the two soil units within the proposed permitted area. You have also provided a Web Soil Survey map and legend printout; however, the soil unit descriptions were not provided



and the map shows a significantly smaller area than the proposed permit. As required by Rule 6.3.2(a), please provide a description of the soil characteristics in the area of the proposed operation. When using Web Soil Survey, please ensure your Area of Interest selection includes at least the entire proposed permit boundary as well as providing each soil unit description printout.

EXHIBIT C - Mining Plan (Rule 6.3.3)

5. Within Exhibit C – Mine Plan, Question 16, you provide direct cost details which include 90 cubic yards of material to be backfilled, 7 cubic yards of topsoil to be replaced, and 5 acres to be revegetated. Please confirm these are values which reflect the maximum amount of disturbance at any one time for your operation. The Division may have identified an error with the amount of topsoil needing to be replaced on multiple excavations totaling 90 CY; please ensure the values above are correct as these will be used by the Division to determine the reclamation bond and will be enforceable permit commitments unless later changed through a technical revision to the permit. The Division will calculate a reclamation bond cost estimate based on the responses to this adequacy letter. The Forest Service will be provided with a copy of this estimate to review it for sufficiency. You will be provided with a copy of the reclamation cost estimate for review before the decision date.

EXHIBIT D – Reclamation Plan (Rule 6.3.4)

6. Within Exhibit D – Reclamation Plan, Question 3, you state the final grade of the reclaimed slopes range from 1 to 2 H : 3 to 4 V. When reviewing the submitted topo map in Exhibit A and Google Earth, it appears slopes generally range from 3H:1V to 2H:1V. Please confirm the anticipated final grade of the reclaimed slopes or range of slopes and present this as X Horizontal: 1 Vertical format.
7. Within Exhibit D – Reclamation Plan, Questions 5 through 10 were not provided. The Division acknowledges the operation will use the provided USFS-approved reclamation seed mixture in place of the example seed mixes of Question 5. Please submit the missing pages of the Reclamation Plan.

EXHIBIT E – Map (Rule 6.3.5)

8. Within Exhibit E – Map, two Mine Plan Maps and a Reclamation Plan Map were provided. These maps contain errors with the scale bars, map scales, and dimensions of the permit boundary. Please correct these maps to accurately depict the size of proposed permit boundary and ensure the scale bar and map scale are correct.

EXHIBIT F – List of Other Permits and Licenses Required (Rule 6.3.6)

9. As the proposed operation has a conditionally approved Mine Plan of Operations from the USFS, there may now be discrepancies between the USFS MPO and the 110(1) permit application following the Division's technical review and your subsequent adequacy review responses. Please commit to informing the USFS of any revisions to your proposed operation once the Division approves your application.

EXHIBIT I - Proof of Filing with County Clerk (Rule 6.3.9)

10. Any changes or additions to the application on file with the Division must also be reflected in the public review copy on display at the local County Clerk's office. Please submit proof that the public review copy has been updated or a copy of the response to this adequacy letter has been added to it.

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This concludes the Division's adequacy review of this application. This letter shall not be interpreted to mean that there are no other technical deficiencies in your application; other issues may arise as additional information is supplied. Please be advised the permit application may be deemed inadequate, and the application may be denied on the decision date, unless the above-mentioned adequacy review items are addressed to the satisfaction of the Division.

If you have any questions or need further information, please contact me at (303) 903-4456 or Elliott.Russell@state.co.us.

Sincerely,

A handwritten signature in blue ink, appearing to read "Elliott Russell", is positioned above the printed name.

Elliott R. Russell

Environmental Protection Specialist

ec: Zach Trujillo, DRMS
Robert Baldwin, MILE HI ROCK AND MINERAL SOCIETY