

September 8, 2025

Kyle Regan  
Civil Resources, LLC  
8308 Colorado Blvd. Suite 200  
Firestone, CO 80504

**RE: Preliminary Adequacy Review; Technical Revision No. 3 (TR-3) – Change Approved Mining Sequence to Begin with Cell 4; Monarch DENM Mine, Permit No. M-2022-009**

Dear Mr. Regan,

On August 28, 2025, the Division of Reclamation, Mining and Safety (Division/DRMS) received your request for Technical Revision No. 3 (TR-3) to revise the approved phased mining sequence at the Monarch DENM Mine, Permit No. M-2022-009. Specifically, the requested change would allow for the mining of Cell 4 first then mining would move to Cell 1 and proceed as originally approved. The following clarification(s) or items need to be addressed to the Division's satisfaction.

1. In TR-3 it is stated that the Cell 4 slurry wall curtain area is approximately 397,320 square feet (sq ft). In TR-2 the Cell 4 slurry wall curtain area was to decrease to 386,980 sq ft due to a reduction in overall length from 9,042 feet to 7,036 feet with the oil and gas infrastructure that was to be installed between Cells 3 and 4. Please clarify the discrepancy and provide an updated Reclamation Plan Map to show just the currently approved cells with their associated slurry wall length, and the location and length of all approved underdrains.
2. Please provide a table or list that clearly indicates the sequence of slurry wall installation along with when the underdrains are anticipated to be installed. Include within the list how or which items will be incorporated, through Technical Revisions, into the approved phased bonding for the site.
3. With the change in cell mining the Reclamation Cost Estimate for the site needs to be updated, please provide an updated cost estimate for the site.

This concludes the Division's adequacy review of your revision application. The Division reserves the right to further supplement this document with additional adequacy items and/or details as necessary.



The decision date for your application is set for **September 27, 2025**. If additional time is needed to respond, an extension request must be received by our Office by the decision date. If on the decision date, outstanding adequacy items remain, and no extension request has been received, your revision may be denied and the file terminated.

If you need additional information or have any questions, please contact me by email at [patrick.lennberg@state.co.us](mailto:patrick.lennberg@state.co.us).

Sincerely,

A handwritten signature in blue ink, appearing to read "Patrick Lennberg".

Patrick Lennberg  
Environmental Protection Specialist

cc: Jared Ebert, DRMS

ec: Kyle Regan, Civil Resources, LLC, [kyle@civilresources.com](mailto:kyle@civilresources.com)