STATE OF COLORADO

DIVISION OF RECLAMATION, MINING AND SAFETY

Department of Natural Resources

1313 Sherman St., Room 215 Denver, Colorado 80203 Phone: (303) 866-3567 FAX: (303) 832-8106



MEMORANDUM

John W. Hickenlooper Governor

Mike King Executive Director

Loretta Piñeda Director

To: Dustin Czapla

From: Tim Cazier, P.E. **H**

Date: June 28, 2013

Re: C-LP-21 Mine Drainage Design Plan – 2nd General Stormwater Comments,

Permit No. M-1977-305 / AM-01

The Division of Reclamation, Mining and Safety (DRMS) engineering staff has reviewed the Response to Adequacy Review #4 for the LP-21 Mine prepared by O'Connor Design Group, Inc., dated June 2013. The following comments are posed to ensure adequate engineering analyses and design practices are implemented to eliminate or reduce to the extent practical the disturbance to the hydrologic balance expected by the mining operation with respect to water quality and quantity in accordance with Rules 3.1.6(1), 6.4.21(10) and 7.3.1. Please note, as this site is a designated mining operation (DMO), compliance with Rule 7.3.1 is applicable, thus requiring certified designs and specifications for engineered elements associated with the environmental protection plan (EPP).). The original comment numbers have been retained for the purpose of tracking responses.

9. Pages ESWMP-15 & 16. The composite area weighted CN indicates both subbasins ON 30 and ON 40 are <u>pinyon-juniper</u> cover. The DRMS understands this reclaimed area to have an herbaceous cover, not "pinyon-juniper". Assuming "poor" cover and the applicant's justification for HSG "B", the CN should be 80, not 75. Please correct the CN values for ON 30 and ON 40. This may require redesign and/or analyses for the pond, spillway and channels designed for runoff control for these two subbasins.

If either you or the applicants have any questions regarding the comments above, please call me at (303) 866-3567, extension 8169.