



COLORADO

Division of Reclamation,
Mining and Safety

Department of Natural Resources
1313 Sherman Street, Room 215
Denver, Colorado 80203

December 8, 2014

Rob Laird
Asphalt Specialties Co
10100 Dallas St
Henderson CO 80640

RE: File M2004-009; Turnpike Mining Resource; Technical Revision TR04

Mr. Laird:

The Division of Reclamation, Mining and Safety received the complete Technical Revision 04 (TR04) request for the Turnpike Mining Resource site on December 1, 2014. DRMS has reviewed the request to revise the mining plan for the Turnpike site, however, the Division will need Asphalt Specialties to clarify some details, and provide additional information, before a decision can be issued on this revision request.

- (1) The TR as submitted states that approximately 8,000 cubic yards (cy) of asphalt and hardened concrete may be disposed of by burial on-site, with another 8,000 cubic yards of this material to be hauled off-site for landfill disposal. Please address all requirements of section 3.1.5(9) of the construction materials rule for backfill of inert off-site fill, item (c) providing an affidavit certifying that the material is clean and inert as defined in rule 1.1(20), as well as information for items (d), (e), and (f).
- (2) How did Asphalt Specialties arrive at the \$4.50/cy cost for off-site disposal at an approved landfill that was utilized in the revised bond calculation?
- (3) Assuming the provided \$4.50/cy cost of fill disposal (\$36,000) and the remainder of the provided bond calculation (\$844,153 direct costs) is accepted, this would result in a bond increase of \$48,583 - not \$16,000 as stated in the cover letter. Current bond for this site is \$1,025,887. The proposed bond amount, with the addition of indirect costs, totals to \$1,074,470.

DRMS suggests that to simplify matters, the surety increase associated with this TR (offsite disposal of imported fill) be combined with the surety increase specified in the pending stipulated settlement agreement for this site after it is approved by the MLRB this month. This adjustment will then require only one SI revision to cover both issues, which DRMS can initiate when the amounts are settled.

Please submit responses to these items to the Division in advance of the TR decision date of December 31, 2014. If you have any questions, please contact me at (303) 866-3567 x8140.

Sincerely,

Eric Scott

Environmental Protection Specialist

