




COLORADO DIVISION OF RECLAMATION, MINING AND SAFETY
MINERALS PROGRAM INSPECTION REPORT
PHONE: (303) 866-3567

The Division of Reclamation, Mining and Safety has conducted an inspection of the mining operation noted below. This report documents observations concerning compliance with the terms of the permit and applicable rules and regulations of the Mined Land Reclamation Board.

MINE NAME: Gardner Gravel Pit	MINE/PROSPECTING ID#: M-1979-034	MINERAL: Sand and gravel	COUNTY: Routt
INSPECTION TYPE: Monitoring	INSPECTOR(S): Amy C. Yeldell	INSP. DATE: August 6, 2015	INSP. TIME: 09:20
OPERATOR: General Operating Company	OPERATOR REPRESENTATIVE: Mike Gomez	TYPE OF OPERATION: 112c - Construction Regular Operation	

REASON FOR INSPECTION: Normal I&E Program	BOND CALCULATION TYPE: Complete Bond	BOND AMOUNT: \$45,250.00
DATE OF COMPLAINT: NA	POST INSP. CONTACTS: None	JOINT INSP. AGENCY: None
WEATHER: Clear	INSPECTOR'S SIGNATURE: 	SIGNATURE DATE: August 21, 2015

The following inspection topics were identified as having Problems or Possible Violations. OPERATORS SHOULD READ THE FOLLOWING PAGES CAREFULLY IN ORDER TO ASSURE COMPLIANCE WITH THE TERMS OF THE PERMIT AND APPLICABLE RULES AND REGULATIONS. If a Possible Violation is indicated, you will be notified under separate cover as to when the Mined Land Reclamation Board will consider possible enforcement action.

INSPECTION TOPIC: Gen. Compliance With Mine Plan

PROBLEM/POSSIBLE VIOLATION: Problem: The current mine plan needs to be updated and clarified pursuant to C.R.S. 34-32.5-112 (1)(c)(VI). The operator must provide sufficient information to describe or identify how the operator intends to conduct the operation. Specifically clarify the maximum number of acres to be affected at one time.

CORRECTIVE ACTIONS: The operator shall submit a Technical Revision, with the required \$216 revision fee, to update and clarify the current approved mine plan to reflect existing and proposed activities by the corrective action date.

CORRECTIVE ACTION DUE DATE: 10/30/15

INSPECTION TOPIC: Sediment Control

PROBLEM/POSSIBLE VIOLATION: Problem: Erosion gullies and ruts were observed on-site. This is a problem at this time for failure to protect the affected land from erosion pursuant to C.R.S. 34-32.5-116 (4) (j).

CORRECTIVE ACTIONS: The operator shall provide photo documentation to the Division verifying ditch erosion has been repaired, and that the site has have been reconstructed and stabilized to prevent erosion damage by the corrective action date.

CORRECTIVE ACTION DUE DATE: 9/30/15

OBSERVATIONS

This inspection was conducted as part of the Colorado Division of Reclamation, Mining and Safety normal monitoring program. Gardener Gravel Pit is a 112c permitted site that includes a total of 40 permitted. It is located approximately 4 miles northeast of Phippsburg, CO and is accessed from Routt County Road 14. Mike Gomez represented General Operating Company and accompanied Amy Yeldell of the Division on the inspection.

The mine identification sign and affected area boundary markers are in place and in compliance with Rule 3.1.12. The sign is posted at the bottom of the access road to the pit. A wire fence delineates the permit boundary.

The ditch along the access road was visibly eroded from recent stormwater events. This is a problem at this time for failure to protect the affected land from erosion pursuant to C.R.S. 34-32.5-116 (4) (j). The operator shall install additional BMP's such as check dams to protect the affected lands from erosion and ensure no off-site damages occur. Other than this ditch no other erosion or stabilization issues were observed.

At the entrance of the pit there is a small office/shop and load scale.

Currently the pit is in 3 sections. Two flat levels for processing and storing material, then the excavated hillside to the north that consists of several benches. A shaker plant is on site to process material. A front end loader was actively loading dump trucks with stockpiled material. All stockpiles are stable. No new material was being processed while the inspector was on site. It appeared that recently new material was being removed from the hillside and stockpiled though. Mike Gomez indicated that to harvest the material benches are ripped into the consolidated rock hillside then using a dozer the rubble is pushed down gradient for processing.

In discussions with the operator it was noted that the permitted verse actual disturbance areas may vary. Currently the permit states only 8 acres may be disturbed. It was indicated that a previous revision was made to increase the maximum affected acreage from 8 acres to 20 acres. No changes in acreages other than the permit conversion in 1998 were found in the Divisions records. As a result general compliance with Mining Plan is cited as a problem. In the form of Technical Revision (TR) please clarify the maximum number of acres to be disturbed at any given time. Note, land that has been reclaimed but not yet release is considered disturbed. Based on GPS estimates approximately 23 acres are currently disturbed, while 2015's annual report indicates 40 acres is currently affected by mining. A TR will require updated maps indicating within the permit boundary what has been disturbed and reclaimed to date. It is also recommended to include other key site features such as buildings, fuel storage, and topsoil salvage.

Two fuel tanks are stored in a secondary containment. Stormwater was observed in the containment. It is recommended that that water be hauled off for disposal to ensure the secondary containment has adequate capacity.

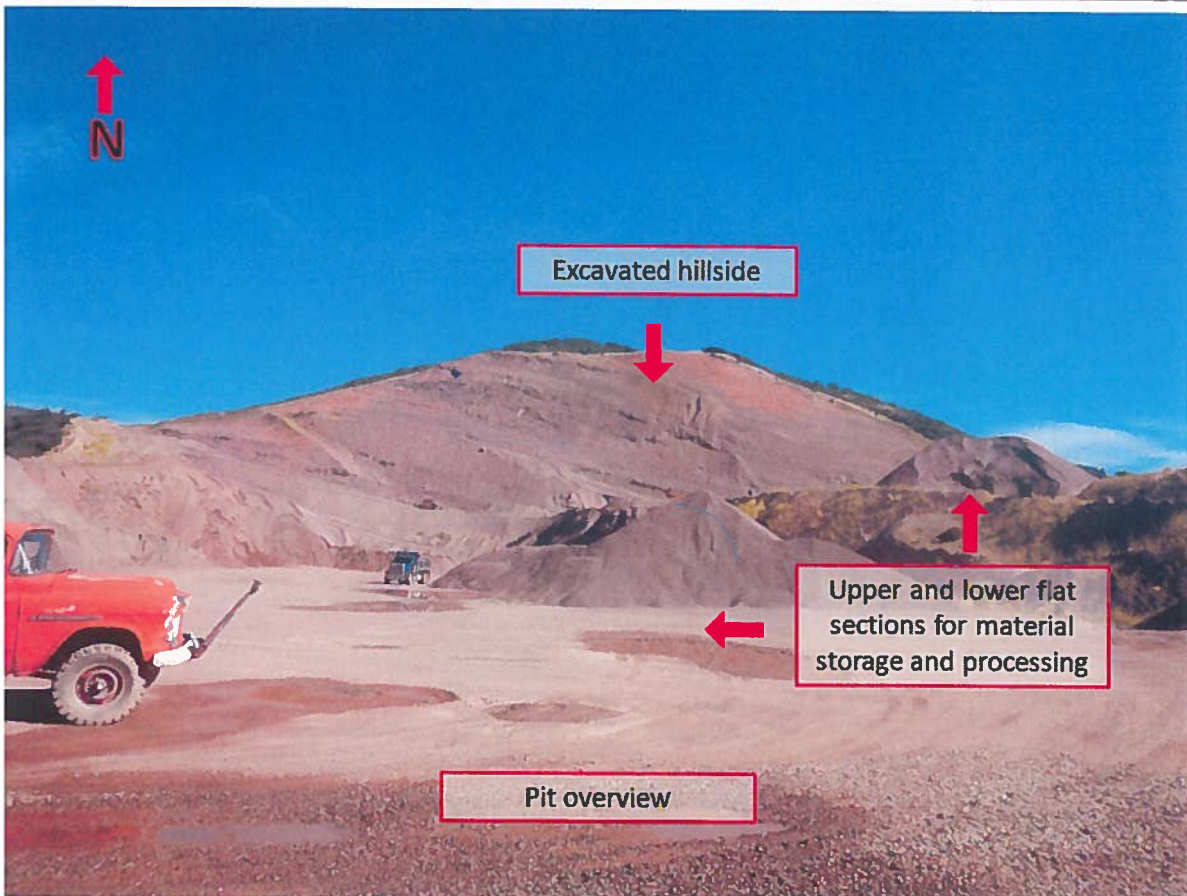
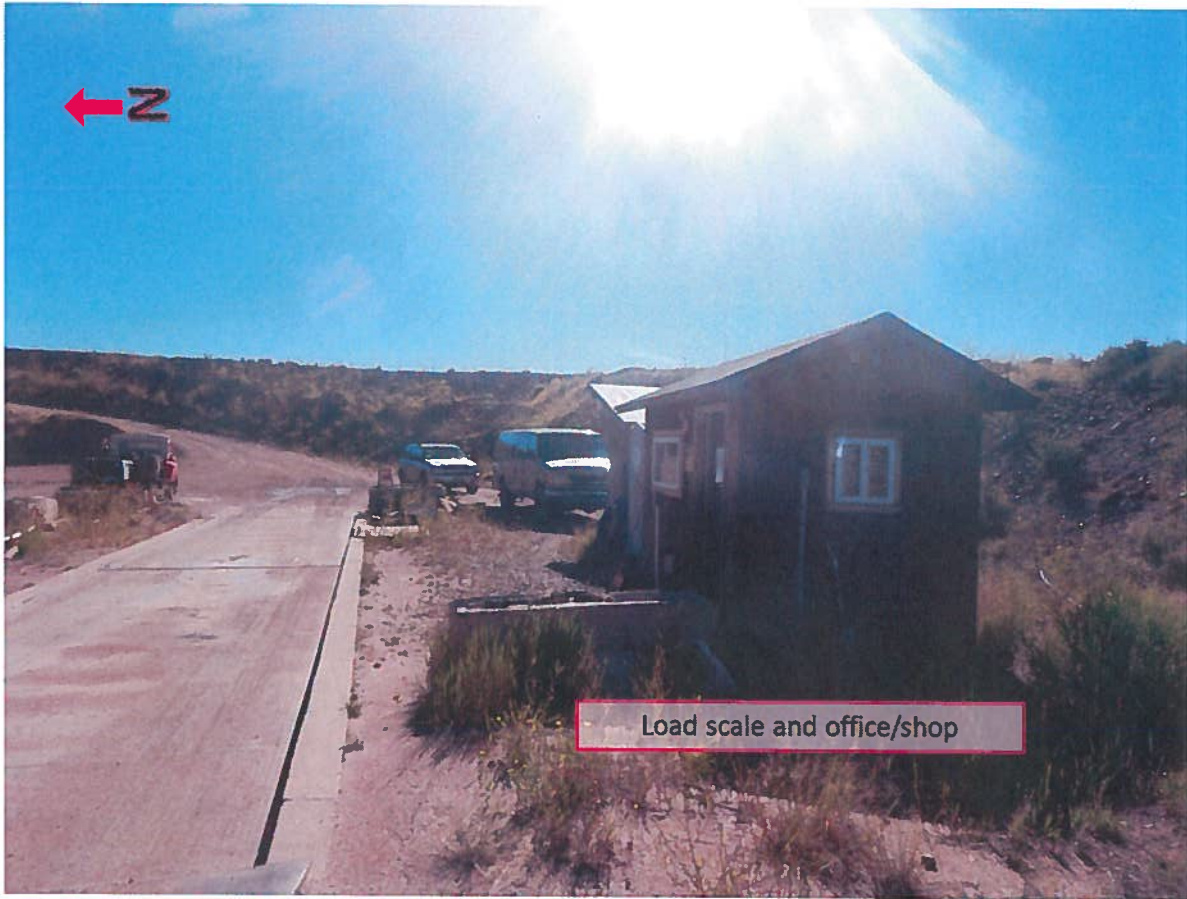
Topsoil piles have been salvaged and re-vegetation is adequate. There is evidence of some weed treatment. The operator is encouraged to review their weed management plan and continually treat noxious weed as needed. The schedule in the weed management plan is a timing guideline however noxious weeds should be treated whenever the opportunity is available and appropriate.

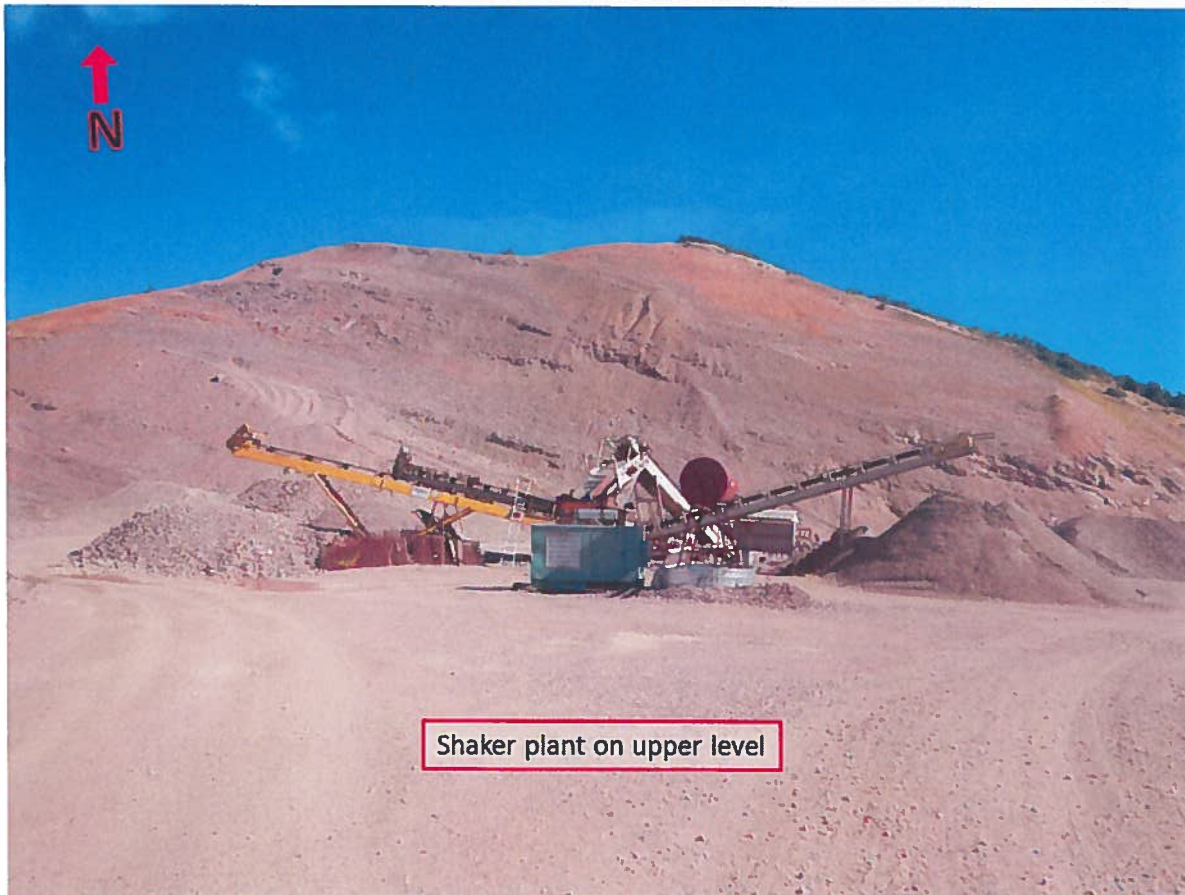
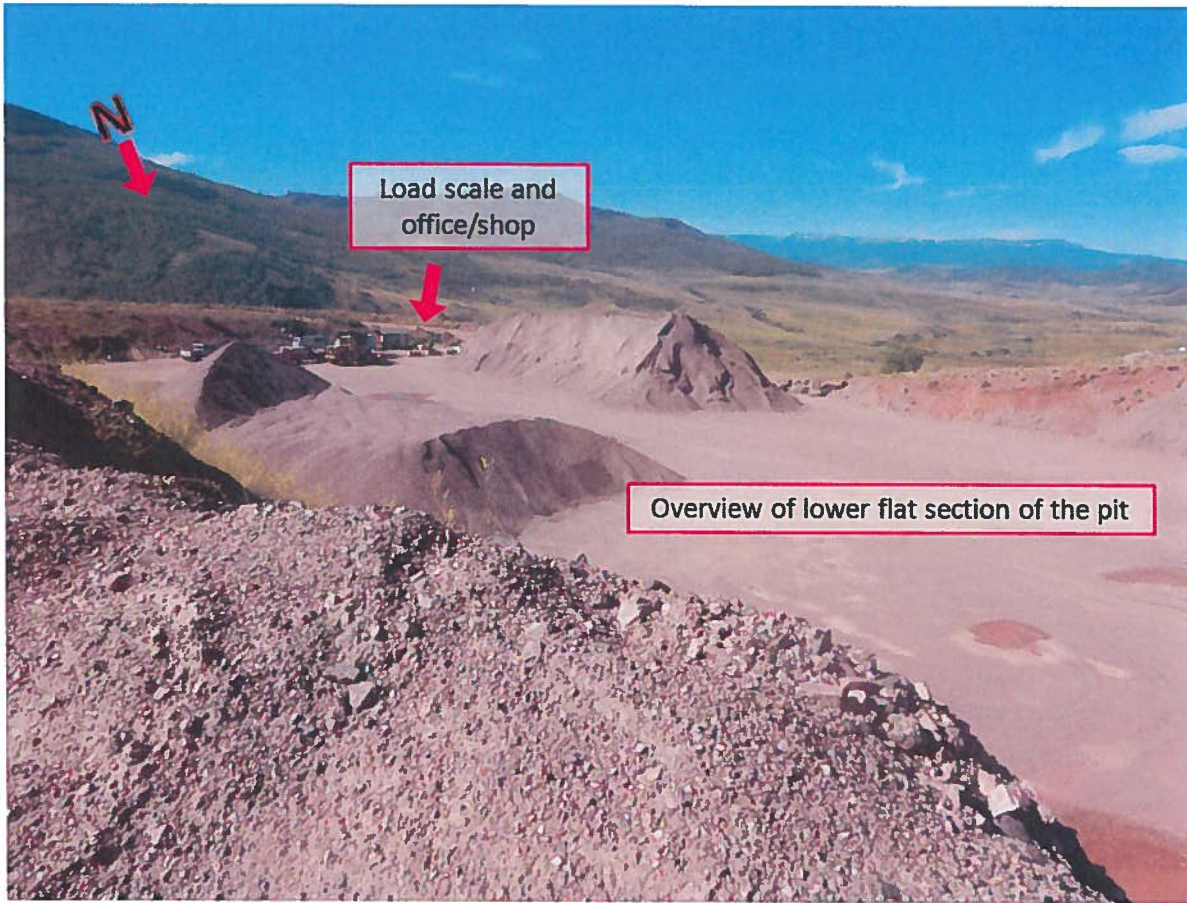
In an effort to ensure the Financial Warranty adequately, reflects the actual current cost of fulfilling the requirements of the approved reclamation plan the Division will be updating the reclamation cost estimate. A copy of the staff calculations will be sent under separate cover.

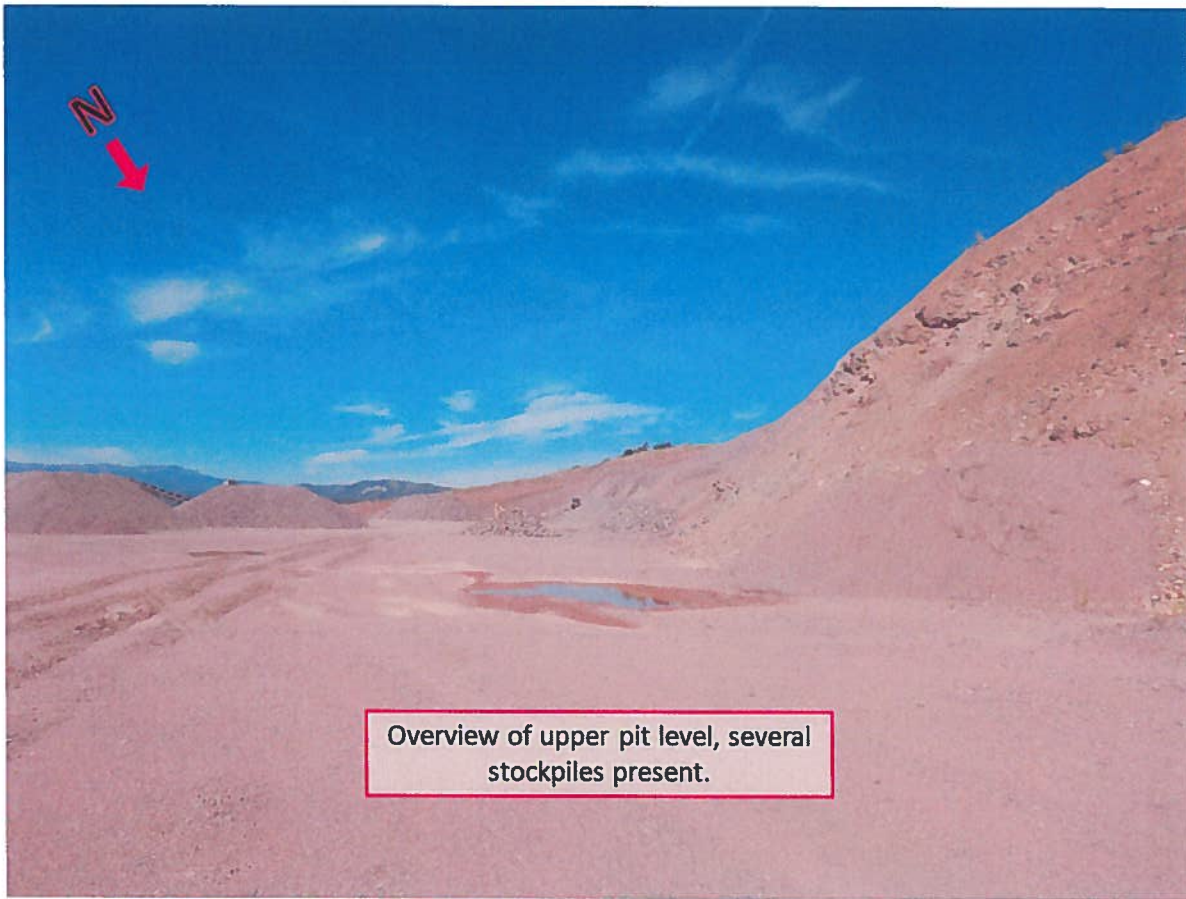
Responses to this inspection report should be directed to: Amy Yeldell at the Division of Reclamation, Mining and Safety, 1313 Sherman St., Room 215, Denver, CO 80203. Direct contact can be made by phone at 970-254-8511 or via email at amy.yeldell@ state.co.us

PHOTOGRAPHS

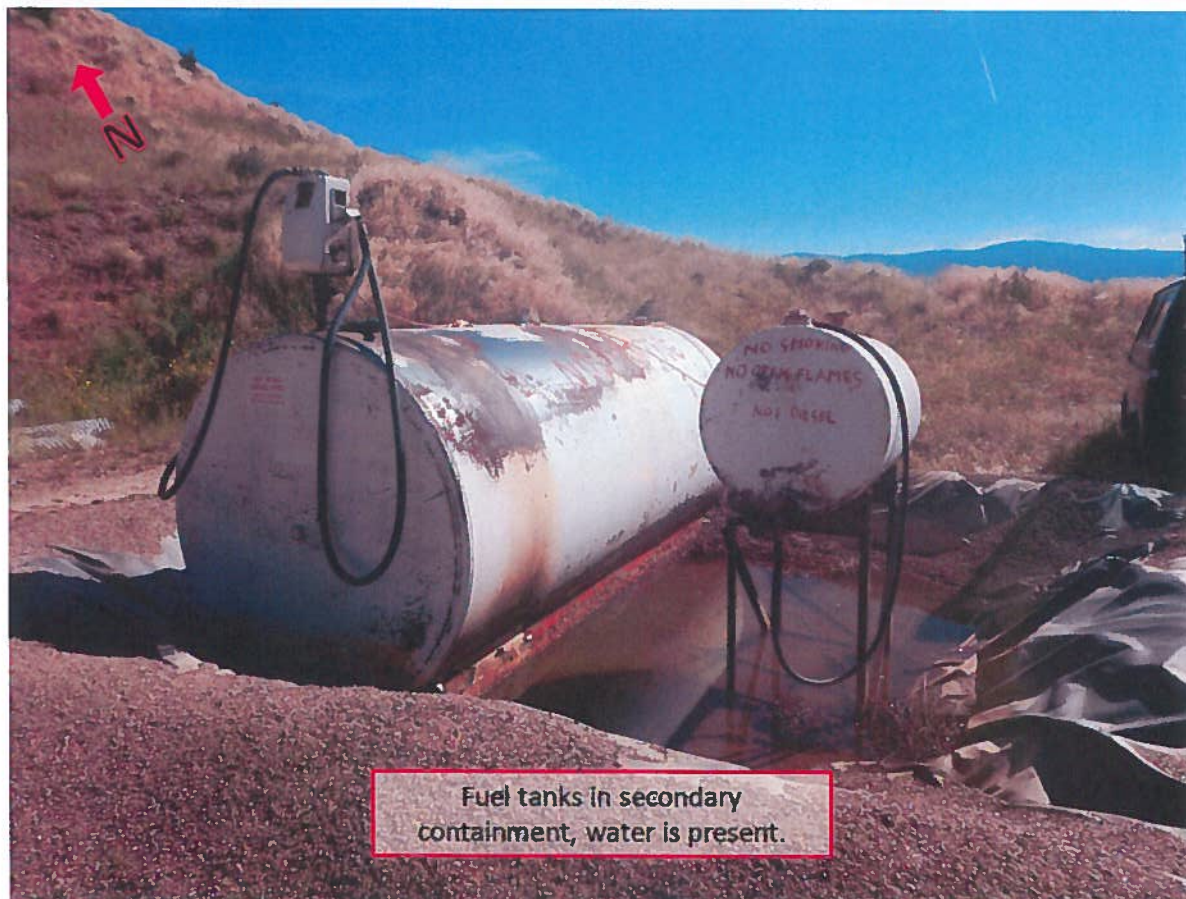








Overview of upper pit level, several stockpiles present.



Fuel tanks in secondary containment, water is present.

GENERAL INSPECTION TOPICS

The following list identifies the environmental and permit parameters inspected and gives a categorical evaluation of each

(AR) RECORDS----- <u>Y</u>	(FN) FINANCIAL WARRANTY----- <u>Y</u>	(RD) ROADS----- <u>Y</u>
(HB) HYDROLOGIC BALANCE----- <u>Y</u>	(BG) BACKFILL & GRADING----- <u>Y</u>	(EX) EXPLOSIVES----- <u>N</u>
(PW) PROCESSING WASTE/TAILING---- <u>Y</u>	(SF) PROCESSING FACILITIES----- <u>Y</u>	(TS) TOPSOIL----- <u>Y</u>
(MP) GENL MINE PLAN COMPLIANCE- <u>PB</u>	(FW) FISH & WILDLIFE----- <u>N</u>	(RV) REVEGETATION---- <u>Y</u>
(SM) SIGNS AND MARKERS----- <u>Y</u>	(SW) STORM WATER MGT PLAN---- <u>Y</u>	(CI) COMPLETE INSP---- <u>Y</u>
(ES) OVERBURDEN/DEV. WASTE----- <u>N</u>	(SC) EROSION/SEDIMENTATION--- <u>PB</u>	(RS) RECL PLAN/COMP-- <u>Y</u>
(AT) ACID OR TOXIC MATERIALS----- <u>Y</u>	(OD) OFF-SITE DAMAGE----- <u>Y</u>	(ST) STIPULATIONS----- <u>N</u>

Y = Inspected and found in compliance / N = Not inspected / NA = Not applicable to this operation / PB = Problem cited / PV = Possible violation cited

Inspection Contact Address

Mike Gomez
General Operating Company
P.O. Box 223
Yampa, CO 80483

Enclosure

Ec:
Russ Means, Senior EPS / Field Office Supervisor, Grand Junction DRMS