

July 22, 2016

Jeff Simonson
Puckett Land Company
118 W Sixth St, Suite 200
Glenwood Springs, CO 81601



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

1313 Sherman Street, Room 215
Denver, CO 80203

RE: Nolte Pit #1, File No. M-2012-016, Technical Revision (TR-2) Adequacy Review 2

Dear Mr. Simonson:

The Division of Reclamation, Mining and Safety (Division) is in the process of reviewing the above referenced Technical Revision in order to ensure that it adequately satisfies the requirements of the Colorado Land Reclamation Act (Act) and the associated Mineral Rules and Regulations for the Extraction of Construction Materials (Rules). During review of the material submitted, the Division determined that the following issue(s) of concern shall be adequately addressed before the Technical Revision can be considered for approval. Please provide the following:

1. Please describe changes to the reclamation plan in the narrative of the TR. The attached map provides some of this information but the narrative does not address the specifics in sufficient detail. The Division recommends that you describe conditions in which methodologies may change rather than specific areas. Also provide ranges of applications when appropriate rather than a set value.
 - a. Drill seeding and hydroseeding were listed at the same seeding rate. Any method other than drill seeding shall be at double the drill seeding rate. Please revise the hydroseeding rate to 48 LBS PLS/Acre.
 - b. Several of your common and scientific names are incorrect/ don't match up. "*Bouteloua curtipendula*" is sideoats grama. "*Pseudoroegneria spicata*" is bluebunch wheatgrass. "*Hilaria jamesii*" is Gallata grass. Please clarify the scientific name listed for Gallata grass. "*Sporobolus cyrptandrus*" is Alkali sacaton. "*Sporobolus airoides*" is sand dropseed.
 - c. The seed mix depicted in on the map is different than the currently approved mix. Is it the operator's intention to revise the seed mix? If so please explicitly state in the narrative that you are changing the seed mix and list out the new mix in the narrative portion of the TR. Explicitly state that seeding rates are show for drill seeding, all other methods will be seeded at double.
 - d. On the map mulching is noted however in the narrative no mulching is mentioned. Please clarify if mulching will be used. If so, which various applications types will be employed? I.e. will hydromulch be used in areas too steep to safely crimp mulch or blown mulch and tackified?
 - e. Explicitly state that the maximum slopes shall be 3:1 or less, with the exception of one central area which was approved for 2:1. All surface roughening measures shall overall conform to this sloping.



- f. To aid the Division in updating the reclamation cost estimate please include a table summarizing the estimated acreage requiring each application method for tilling, fertilizer, seeding and mulching. Please specify which combinations are most likely to be used.
- i. Tilling: chisel plowing, disc harrow 6" deep, hand raking, subsoiling scarification, subsoiling heavy 18" deep, subsoiling light
 - ii. Fertilizer: hand spread, hydro spreader, push rotary spreader, tractor towed spreader, truck whirlwind spreader, none
 - iii. Seeding: broadcast seeding, drill seeding, hydro seeding
 - iv. Mulching: crimping with tractor (requires power mulcher), hydromulch applied with hydroseeding, hydro mulch applied without hydro seeding, jute mesh (rolled blankets), none
 - v. Please specify how much area will required poking using mechanical equipment and the anticipated size of equipment to be used.
- g. Please revise your seeding dates to September 15 to April 15. Also please state your seeding dates in the narrative portion of the reclamation plan.

Based on the decision due date the Division highly recommends that you request an extension of two weeks or more. Currently the decision due date is July 25, 2016.

If you require additional information, or have questions or concerns, please feel free to contact me. 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

Sincerely,



Amy Yeldell

Environmental Protection Specialist
Department of Natural Resources
Division of Reclamation, Mining and Safety
Phone: (970) 254-8511
Fax: (970) 241-1516

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