




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: Big "G" Gravel Pit	MINE/PROSPECTING ID#: M-2006-081	MINERAL: Sand and gravel	COUNTY: Pueblo
INSPECTION TYPE: Monitoring	INSPECTOR(S): Elliott R. Russell	INSP. DATE: May 18, 2017	INSP. TIME: 11:45
OPERATOR: Daniel J. Gaudreault and Barbara J. Gaudreault	OPERATOR REPRESENTATIVE: Daniel Gaudreault	TYPE OF OPERATION: 112c - Construction Regular Operation	

REASON FOR INSPECTION: Priority	BOND CALCULATION TYPE: None	BOND AMOUNT: \$223,000.00
DATE OF COMPLAINT: NA	POST INSP. CONTACTS: None	JOINT INSP. AGENCY: None
WEATHER: Clear	INSPECTOR'S SIGNATURE: 	SIGNATURE DATE: July 24, 2017

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.

GENERAL INSPECTION TOPICS

The following list identifies the environmental and permit parameters inspected

(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>NA</u>
(PW) PROCESSING WASTE/TAILING---- <u>N</u>	(SF) PROCESSING FACILITIES----- <u>N</u>	(TS) TOPSOIL----- <u>Y</u>
(MP) GENL MINE PLAN COMPLIANCE- <u>Y</u>	(FW) FISH & WILDLIFE----- PB	(RV) REVEGETATION---- <u>N</u>
(SM) SIGNS AND MARKERS----- PB	(SP) STORM WATER MGT PLAN---- <u>N</u>	(CI) COMPLETE INSP---- <u>Y</u>
(ES) OVERBURDEN/DEV. WASTE----- <u>N</u>	(SC) SEDIMENT CONTROL----- PB	(RS) RECL PLAN/COMP-- <u>N</u>
(AT) ACID OR TOXIC MATERIALS----- <u>N</u>	(OD) OFF-SITE DAMAGE----- <u>Y</u>	(ST) STIPULATIONS----- <u>N</u>

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

PROBLEMS/POSSIBLE VIOLATIONS

INSPECTION TOPIC: Sediment Control

COMPLIANCE PROBLEM #1: Approved storm water control and sedimentation prevention methods have not been implemented or have not been constructed appropriately.

CORRECTIVE ACTIONS: The operator shall submit photographic evidence showing storm water control methods have been implemented.

CORRECTIVE ACTION DUE DATE: August 23, 2017

INSPECTION TOPIC: Fish & Wildlife

COMPLIANCE PROBLEM #2: An open test pit poses a threat to wildlife/livestock.

CORRECTIVE ACTIONS: The operator shall submit photographic evidence showing the test pit has been backfilled or safeguarded.

CORRECTIVE ACTION DUE DATE: August 23, 2017

OBSERVATIONS

This inspection was conducted as a follow up to the Division's March 1, 2017 inspection. The purpose of this inspection was to meet with the Operator, discuss the enforcement process for the previously cited possible violation, and check the status of previously cited compliance problems. Elliott Russell, with the Division, conducted the inspection and Daniel Gaudreault, the Operator, accompanied the inspection. The Operator's consultant, Joseph Gagliano, also accompanied the inspection. Keith "Bud" Tucker and Jake Tucker were present for the inspection as well.

The Big "G" Gravel Pit is a Construction Material Regular 112c Operation Reclamation Permit and is approved to affect 193 acres of land. Affected lands will be reclaimed to support rangeland post-mining land use. The site is located nine miles east-southeast of Avondale, Colorado.

The Division met Dan, Joe, Keith, and Jake at the mine site entrance on the north side US Highway 50. The mine site identification sign was posted at the entrance and was in compliance with Rule 3.1.12(1). The site was not active at the time of the inspection, however the Division observed evidence of recent activity.

After discussing the various issues at the site involving off-site damage, phased bonding, and past due Annual Reports and Fees, the Division inspected the status of the implementation of storm water controls in the northern mining area. An appropriate berm has been installed between the Highland Canal and the large processing area. Based on silt levels, it appears the berm has already been effective at controlling storm water allowing sediment to settle out on-site. However, the drainage ravine located southeast of the first terrace being mined does not have appropriate storm water controls in place. This has been cited as Compliance Problem #1 requiring the Operator to establish an adequate berm before the Highland Canal to keep storm water and sediment on-site.

During the inspection, the Division observed an open test pit just south of the active mining area at 38.188640° N 104.191612° W. It appears this pit/trench was used to determine the depth of the deposit, however, since it was left open with vertical sides, it is a wildlife hazard. If the site is grazed, this test pit could also be a hazard for the livestock. This has been cited as Compliance Problem #2 requiring the operator to either backfill the test pit or safeguard it by other means.

Since the date of inspection, the Operator has resolved the financial warranty compliance problem. On June 5, 2017 the Operator complied with Surety Increase (SI-01) and the Division accepted the increase amendment of \$179,679 to the LOC currently held to a total of \$223,000. To ensure the operation does not advance beyond the phases (Phase 1, Phase 2, Phase 3, and Phase 7) associated with the bond, the Division still highly recommends the Operator delineate these phases. Marking the boundaries of the active phases will allow the Operator and any sub-contractors to understand the approved limits of the phased bond amount.

On June 28, 2017, the Mined Land Reclamation Board accepted the Operator's consent to a possible violation for failure to obtain from the board or office a reclamation permit prior to engaging in a new operation (off-site damage exceeding 2 acres) and found Violation MV-2017-027. The Board's Order was effective July 7, 2017. Important dates are summarized below:

- Unsuspended civil penalty of \$1, 000 due on or before **August 7, 2017**.
- A complete Amendment (AM-01) application filed on or before **October 5, 2017**.

This concludes the Division's Inspection Report; a subset of photographs taken during the time of the inspection are included below. If you need additional information or have any questions, please contact me at Division of Reclamation, Mining and Safety, 1313 Sherman Street, Room 215, Denver, CO 80203, by telephone at **303-866-3567 x8132**, or by email at elliott.russell@state.co.us.

Inspection Contact Address

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CC: Wally Erickson with DRMS

PHOTOGRAPHS



Photo 1. Storm water control berm around lower portion of the processing/stockpile area; looking northeast.



Photo 2. Storm water control berm around lower portion of the processing/stockpile area; looking southeast.



Photo 3. Drainage ravine where additional storm water management techniques are needed; looking southeast.



Photo 4. Open test pit which poses as a hazard; looking north.