



Locatable Minerals Site Inspection
U.S. Department of the Interior
Bureau of Land Management
Royal Gorge Field Office



Date: 09/13/2016 Time: 12:50 - 1:10 p.m. Weather: Cloudy Inspection Purpose: General	Project Name: First Bentonite Case Number: COC 051303 Operator: Pam Wedige Location: Coaldale, CO
Attendees BLM: William Jenkins Operator(s): Not onsite Other(s): N/A	Project Status: Active (beginning reclamation) Project Type: Plan of Operations Occupancy: None
General Compliance Compliance with the filed Plan of Operations, and 43 CFR 3809 (in particular the performance standards outlined in 3809.420).	In general, the operation is in compliance with the Plan on file with BLM. ☒ Yes ☐ No ☐ N/A In general, the operation and disturbances on site coincide with the method of prospecting, mining, and access described in the Plan of Operations. ☒ Yes ☐ No ☐ N/A

SITE MANAGEMENT

<u>Site Conditions</u> ☐ Housekeeping ☐ Access (clear, bermed, signed, accurate with Plan?) ☐ Acreage (disturbance per plan? site secured per plan?)	Good Housekeeping. The access road is well maintained to the parking area. Disturbance has not changed since the previous inspection.
<u>Claim Markers</u> ☐ Claim Signs ☐ Corners ☐ Discovery Post	☐ N/A The DRMS sign was posted at the entrance to the site. No claim corners or discovery posts were looked for during the inspection.

<u>Erosion Control</u> ☐ Grading ☐ Vegetation ☐ Drainage Control ☐ Best Management Practices (berms, armored drainage)	☐ N/A The operator will be beginning final reclamation in the next few weeks. Reclamation will involve grading, seeding, and implementing drainage improvements.
<u>Materials Management</u> -Topsoil -Overburden -Waste Rock -Tailings -Ore Piles -Fines ☐ Location ☐ Best Management Practices ☐ Containment/Lining (as applicable) ☐ Stability (angle of repose, size of material)	☐ N/A The site has several stockpiles of topsoil, overburden, and product. Likewise, there are several product piles on the northern staging area.
<u>Container/Tank Management</u> ☐ Substance ☐ Storage Container/Tank (overall condition, tank capacity, secondary containment) ☐ Spill Contingency (fixed in a timely manner? Or controlled to prevent hazardous conditions?) ☐ Substance appropriately labeled? (NFPA, SDS accessible) ☐ Best Management Practices	x N/A
<u>Weed Management</u> ☐ Weed Control Plan ☐ Control Methods ☐ Type & Percent Surface Cover ☐ Best Management Practices	☐ N/A Minor amounts of Mullein weed were observed near the highwall.
<u>Highwall/Working Face Conditions</u> x Working ☐ Reclaimed -Ravelling or rock fall present -Tension cracks -Benches (are they clean?) -Adequate ingress/egress -Measurements (concurrent with ops - height, depth, slope)	☐ N/A There was no evidence of highwall tension cracks, ravelling, or rock fall observed during the inspection. There appears to be adequate ingress/egress at the base of the highwall. The highwall is currently about 18 feet tall and near vertical.
<u>General Safety Conditions</u> ☐ Temporary Fencing ☐ Flagging ☐ Signage (mine site, direction of travel, etc.)	☐ N/A The operator does not incorporate any flagging, or signage for safety. However, the site is fenced to provide a visual delineation of the site. Overall,

	there did not appear to be any issues with safety during the inspection.
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PLAN OF OPERATIONS

<u>Operations</u> ☐ Location ☐ Does their Plan include an occupancy? (location of temporary/permanent structures) ☐ Any observed impacts outside of Plan?	The operator has previously pulled clay from the highwall. The operator's plan does not include an occupancy, and there were no observed impacts outside of what is described in the Plan.
<u>Operating Practices</u> ☐ Mining Methods (Surface or Underground) ☐ Equipment (types, concurrent with Plan, good working condition) ☐ Surface Disturbances (size, and removed quantity) ☐ Processed Material Management (location, berms, HPDE lining)	The operator uses a backhoe w/a front loader. The clay is stockpiled in the parking area where it can be loaded into haul trucks. No equipment was observed during the inspection. The surface disturbances were concurrent with the disturbances described in the Plan.
<u>Quality Assurance/Monitoring</u> ☐ Reporting Procedures ☐ Systematic Monitoring (frequency, sampling procedures, adverse results response, monitoring programs - air, water, revegetation, stability, noise, etc.)	☐ N/A The operator visually monitors the site (e.g. water and revegetation) when they are operating.
<u>Drilling</u> ☐ Method (Air, Fluid) ☐ Drill Pads (location) ☐ Mud Pits (location, containment) ☐ Drill Hole Plugging and Re-Contour	x N/A
<u>Underground Operations</u> ☐ Groundwater (Is there water coming from the adit?) ☐ General Safety (roof stability, ventilation, cribbing condition, monitoring practices, etc.) ☐ Dimensions (Have the adits, shafts, trenches been advanced?)	x N/A
<u>Water Management</u> ☐ Mitigation Measures (dewatering/pumps, sediment containment, chemical treatment systems, storm water runoff controls) ☐ Ditch/Impoundment Capacity (will they contain the volume generated by a 100 year 24 -hour rain event?) ☐ Impoundment Structures (Water, tailings ponds, etc.)	x N/A The operator does not use water in their production.

- adequate freeboard - dimensions, stability - leaking at base?	
<u>Ore Processing</u> ☐ Non-Chemical Processing (crushing, screening, washing) - methods, equipment condition, water source ☐ Chemical Processing (leaching, milling) - methods, chemicals involved (Xanthates, Cyanide, etc.), spill contingency	☐ N/A The operator does not process the bentonite clay they produce (it is used in its existing condition).
Actions to be taken by the Operator Operators should read this report carefully because it may require corrective action and/or response to the BLM in order to avoid consideration of possible enforcement action.	None.
General Comments Other observations and notes from the inspection	- The operator intends to initiate final reclamation ASAP. - The operator expects the reclamation to begin in two weeks, when there is equipment available to do so. - Per the existing reclamation plan, the operator will have to contour the highwall to a 3:1 slope. Likewise, the existing stair-stepped topography below the highwall should be contoured to a 3:1 slope to form a topographic basin. - Additional reclamation efforts should focus on linking the reclaimed/recontoured drainage to the existing drainage which pre-dates the mine. - The sediment impoundments to the northwest will need to be scraped. - The existing access road should be reclaimed.
Date Inspection Shared with CDRMS:	Date Inspection Shared with Operator:

Photo Summary

Photo 1: A view towards the highwall from the parking/staging area



Photo 2: The clay mine highwall to be reclaimed to a 3:1 slope (Jeep for scale).



Photo 3: A panoramic view of the highwall.



Photo 4: The view to the North from the southern boundary of the pit.



Photo 5: The basin below the parking/staging area.



Photo 6: The topographic boundary between the mine area and the natural drainage.



Photo 7: The drainage outlet on the northeastern side of the drainage ponds.

