



COLORADO

**Division of Reclamation,
Mining and Safety**

Department of Natural Resources

1313 Sherman Street, Room 215
Denver, CO 80203

December 22, 2017

Andrew Blackford
Mann Lake Holdings, LLC.
2027 W. Colfax Avenue
Denver, Colorado 80204

**RE: M & G Pit, M-1986-079, Succession of Operators/Permit Transfer Application (SO03)
Adequacy Review No. 1**

Dear Mr. Blackford,

The Colorado Division of Reclamation, Mining, and Safety (Division) has reviewed all of the documents submitted for the Transfer of Mineral Permit and Succession of Operator application for the above referenced site. Also, the Division conducted the required site inspection on December 20, 2017.

The Engineering Analysis (EA) submitted to the Division was reviewed by one of our staff engineers. A review memo dated December 14, 2017 regarding the EA is attached. Please address the issues identified in the review memo.

The current permittee has posted a financial warranty in the amount of \$283,500.00. Based on the observations made during the inspection and information contained in the 2017 annual report, the Division calculated the remaining liability at the site to be about \$243,300.00, this is about \$40,200.00 less than the current liability posted. Given this, there are several options to proceed with the approval of the permit transfer:

- 1.) Option 1, Mann Lake Holding, LLC. (Successor Operator) could post the currently required financial warranty of \$283,500.00.
- 2.) Option 2, Mann Resources, LLC (Current permit holder) could submit and receive approval of a surety reduction request in accordance with Rule 4.14 to lower the required liability amount to \$243,300.00. Subsequently, the Successor Operator could submit a financial warranty in the \$243,300.00 amount and the SO3 application would then be approved.

Prior to the approval of the SO3 application, please address the adequacy issues pertaining to the Engineering Analysis and complete Options 1 or 2 noted above regarding the financial warranty. If you have any questions feel free to contact me at (303) 866-3567, extension 8120.



Mann Lake Holding, LLC.

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December 22, 2017

Sincerely,

A handwritten signature in blue ink, appearing to read "Jared Ebert", with a stylized flourish at the end.

Jared Ebert

Environmental Protection Specialist III

Enclosures: 1.) *M & G Pit – Permit No. M-1986-079, Slope Stability, Preliminary Adequacy Review,
Dated December 14, 2017*
 2.) *Request for Surety Reduction Application*

ec: Clay Carlson, Mann Resources, LLC. clay@carlsonland.net
 Joseph M. O' Dea, jodea@ceiconstructors.com



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MEMORANDUM

To: Jared Ebert

From: Tim Cazier, P.E. 

Date: December 14, 2017

**Re: M & G Pit – Permit No. M-1986-079;
Slope Stability, Preliminary Adequacy Review**

The Division of Reclamation, Mining and Safety engineering staff (Division) have reviewed the M & G Pit engineering analysis submitted in lieu of structures agreements required for SO-03 and dated December 4, 2017.

1. Slope stability analyses most basic requirement is that equilibrium must be satisfied in terms of total stresses. All body forces (weights) and all external loads, including those due to water pressures acting on external boundaries must be included in the analyses. Simply comparing internal friction angles with possible slope angles does not accomplish this.
2. Internal friction angles for “unconsolidated dirt” are stated without any reference to laboratory testing or accepted published values. Given the generic use of the term “dirt”, there is no way to verify values used.

A global stability analysis that factors in material strength properties (with references), water table levels and saturated toes of slopes are required to meet Rule 6.5(3).

If either you or the applicants have any questions regarding the comments above, please call me at (303) 866-3567, extension 8169.





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REQUEST FOR FULL OR PARTIAL RELEASE OF PERMIT AREA/SURETY REDUCTION

Please indicate if you are requesting:

FULL/FINAL RELEASE OF ENTIRE PERMITTED AREA (per Rule 4.17)

☐

ACREAGE REDUCTION (PARTIAL RELEASE per Rule 4.17)

☐

I wish to release _____ acres at this time.

You will need to submit with this request: a map showing the acreage to be released from the current permit and updated mining and reclamation plan maps that will accurately depict the new permit boundary if the release is approved.

SURETY (Bond) REDUCTION (per Rule 4.14)

☐

If you are requesting a surety (bond) reduction you will need to include with this request a new estimate of the actual cost to reclaim the site based on what it would cost an independent contractor to complete reclamation, including unit costs for reclamation activities as appropriate to the operation to comply with the provisions of Rule 3.1 and the Permit's approved Reclamation Plan.

File No.: M Site Name: _____

County: _____

Permittee: _____

Permittee Address: _____
(Street Address)

(City)

(State)

(Zip)



Operator (If Other than Permittee): _____

Permittee Representative: _____

Certified Mail # _____

In accordance with Rule 4.17.1(2) the Operator shall include the names, addresses and phone numbers of all owners of record to the affected land. Please attach additional sheets for this information if required.

<u>Name</u>	<u>Address</u>	<u>Phone Number</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

In accordance with Rule 4.17.1(4), if requesting a partial acreage release the Operator or their agent MUST sign that they have complied with the following statement: “All applicable portions of the Reclamation Plan requirements have been satisfied in accordance with these Rules and all applicable requirements under the Act.”

Signature of Permittee, Operator or their authorized agent Date

Important: In accordance with Rules 4.14.2(a) and 4.17.1(3) This release request must be submitted to the Division via certified mail and separate from any other correspondence to the Division.