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Dustin Czapla Colorado Division of Reclamation, Mining, and Safety 1313 Sherman St, Rm 215 Denver, CO 80203

DIVISION OF RECLAMATION MINING AND SAFETY

RE: Ready Mix Pit, M-1977-023, 112c AM-1 Adequacy Response

This letter is in response to the adequacy letter dated January 29, 2018 from your office. The only item listed in this adequacy review was the need for mining and reclamation plans specific to the plant and shop area of the Ready Mix Pit.

It should be noted that the application submitted to your office contains several references to the "processing area" of the pit. This is the area covered by plants, the shop, stockpiles, and all other non-excavation activities within the proposed affected area. Further information has been added to Exhibit D specifically about the plant and shop portions of the processing area.

This same processing area was not mention in Exhibit E – Reclamation Plan. Therefore, this portion of the permit has been revised to incorporate the processing area into all proposed reclamation plans.

Exhibit L has been revised to include the demolition cost of the structures to be found in the plants area.

Please contact me if you have any further questions or concerns.

Sincerely,

Ben Langenfeld, P.E. Greg Lewicki and Associates EXHIBIT D MINING PLAN

1. General Mining Plan

The permit area for the Ready Mix Pit is 76.0 acres. 7.3 acres of that area will be disturbed as part of mining operations. 17.9± acres will be the processing and stockpiles area. The processing area consists of the plants, fuel storage, and a shop. The remaining area consists of previously reclaimed ponds, access roads, and undisturbed areas. Sand and gravel for use in making construction materials products will be mined onsite. Crushing, screening, and washing of material will all take place on site. Asphalt and concrete production will take place on site. Reclamation will occur concurrently with mining, as mining progresses from east to west. Table D-1 shows the area breakdown for the site.

Mining Phase Area
Processing 17.9 Acres
Mining 7.3 Acres
Reclaimed Ponds 31.3 Acres

19.5

Acres

76.0 Acres

Table D-1 Mining Areas

Mining will stay 30 feet from the north, west, and south fences, and at least 100 feet from the reclaimed pond to the east. Setbacks of this size ensure the protection of outside structures from excavation related impacts.

Undisturbed

Total

Topsoil and overburden berms may be constructed inside the above listed setbacks as part of noise and visual mitigation.

Blasting will not take place at the Ready Mix Pit.

2. Mining Timetable

Production is planned at around 150,000 tons per year. The deposit is believed to contain roughly 600,000 tons. Based on these calculations, the pit could be mined out in approximately six years.

1. General Reclamation Plan

Ready Mix Pit will disturb 52.6 acres of the permitted 76.0 acres as part of mining. 40.7 acres will be the mine pits, while the remainder will be berms, roads, the processing area and the detention pond. Reclamation involve the removal of all structures in the processing area. The reclamation breakdown of the site is as follows:

Table E-1 Reclaimed Areas

Post Mine Land Use	Area (acres)	
Revegetated land	19.4	
Lakes	37.1	
Undisturbed	30.1	
Total	86.6	

Reclamation will be pursued contemporaneously with mining. Backfilling to the final contour, as shown on Map F-1, will take place as mining progresses. The final shape of the reclaimed lakes will be like that shown on Map F-1. Due to the lack of reliable backfill material, slopes will be mined to their final configuration.

Final reclamation slopes will be 3H:1V down to five feet below the anticipated water level, and then 2H:1V to the bottom.

The post-reclamation land use of the site will be dry rangeland and reclaimed lakes.

2. Topsoil Replacement

Topsoil will be replaced at a depth of 4-8 inches across all areas. Areas that are more than five feet below the water line will not be topsoiled. Once topsoil has been placed on an area, it will disced or harrowed prior to seeding. Topsoiling of the existing area will take place during the mining of the expansion area.

EXHIBIT L

WORST CASE RECLAMATION SCENARIO

The worst case reclamation scenario will be at the end of mining in the expansion pit. Large scale dewatering combined with the topsoiling activities needed throughout the site will dictate the bond for the Ready Mix Pit. Below is a description of the reclamation activities, followed by a calculation of the estimate bond.

- 1. Dewatering 7.3 acre pond. 187 ac-ft @ \$75/ac-ft = \$14,025
- 2. Replace topsoil on all disturbed areas. Six inches over 19.4 acres. 15,649 CY @ \$1.50 CY to haul and place = \$23,474
- 3. Remove all facilities and equipment, including shop and plant buildings. Roughly 12,400 sq. of foundation. \$20,000
- 4. Seeding and mulching all applicable areas. 19.4 acres @ \$700/acre = \$13,580

Worst case reclamation costs for this scenario are shown in Table L-1 below:

Table L-1 Reclamation Task and Cost Estimate

Activity Description	Time (Months)	Cost (\$)
Activity Description	Time (Months)	COSt (\$)
Dewatering Phase 1 lake	0.25	14,025
Replace topsoil on all disturbed areas	1	23,747
Domovo all facilities and acvinment	0.05	
Remove all facilities and equipment	0.25	20,000
Seed and mulch all topsoiled areas	0.25	13,580
Totals	2.5	\$71,352
DRMS Costs (28% x direct costs)		\$19,979
Total Bond Amount		\$91,331