



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

1313 Sherman Street, Room 215  
Denver, CO 80203

March 6, 2018

Mr. Jason McGraw  
General Shale Brick, Inc.  
1845 W. Dartmouth Ave.  
Denver, CO 80110-1308

**Re: General Shale Brick, Inc., DDD Mine, Permit No. M-1984-076,  
Technical Revision No. 4 (TR-04) Adequacy Review**

Mr. McGraw:

The Division of Reclamation, Mining and Safety (Division/DRMS) has reviewed the content of the technical revision application (TR-04) for the DDD Mine submitted on March 2, 2018 and submits the following comments. The Division is required to make an approval or denial decision no later than April 2, 2018 therefore; a response to the following adequacy review concerns should be submitted to the Division as soon as possible.

1. The Operator states the Exhibit C-1A Affected Lands Map was revised to indicate how the lease and permit boundary is divided amount the three landowners. The Exhibit C map received by the Division is labeled Exhibit C-1, no Exhibit C-1A. Please update the map label to match the technical revision description.
2. In the Exhibit D Mining Plan section, the Operator proposes to change the buffer area from 9.7 to 2.24 acres for a total disturbance acreage of 56.81 acres for the DWR Pit (west pit). Please provide justification for the reduction in the buffer acreage and indicate where the change in the buffer acreage occur on the Exhibit D-1A - Mine Plan Map.
3. In the Exhibit D Mining Plan section, the Operator states based on a survey of the clay leases the permitted acreages are actually 59.06 acres, not 60 acres for the DWR pit (west pit) and 41.47 acres, not 41.4 for the DEB pit (east pit). Please provide the Division with a copy of the metes and bounds survey descriptions for both sites to justify the change in the permitted acreage.



Please be advised the technical revision for the DDD Mine may be deemed inadequate, and the revision may be denied on April 2, 2018, unless the above mentioned adequacy review items are addressed to the satisfaction of the Division.

If you have any questions, please contact me at [peter.hays@state.co.us](mailto:peter.hays@state.co.us) or (303) 866-3567 Ext. 8124.

Sincerely,



Peter S. Hays  
Environmental Protection Specialist

Ec: Wally Erickson; DRMS