



## COLORADO

Division of Reclamation,  
Mining and Safety

Department of Natural Resources

1313 Sherman Street, Room 215  
Denver, CO 80203

October 11, 2018

Randy Schafer  
40586 Co. Rd. 21  
Haxtun, CO 80731

**RE: Goddard Pit #1, M-2018-050, 111(c) Permit Application  
Adequacy Review No. 1**

Dear Mr. Schafer:

The Colorado Division of Reclamation, Mining, and Safety (Division), received the above referenced application on October 1, 2018. The application was deemed complete for review on October 4, 2018. The Division must issue a decision on the application by October 19, 2018. The following items will need to be addressed prior to the decision date:

**Rule 6.3.1, Exhibit A – Legal Description and Location Map**

- 1.) The coordinates provided on the location map differ from the coordinates provided on Page 2 of the application form. Please specify the location of the main entrance to the mine site. This location shall be reported as latitude and longitude or the Universal Transverse Mercator (UTM) Grid.

**Rule 6.3.2, Exhibit B – Site Description**

- 2.) Based on the soils series description for the site, there is a viable A and B horizon eight inches deep. Please revise Exhibit B to indicate the soil depth is eight inches at the site or provide further justification for only designating the top four inches as topsoil.
- 3.) Attached is a map that the Division created with the permit boundary depicted and a 200 foot buffer around the proposed affected area. There appears to be more permanent man-made structures within 200 feet of the affected area than was identified in the application. Based on the Division's review, these are the structures within 200 foot of the affected land not included in the application:
  - a. Driveway into Reicks property
  - b. County Road 28
  - c. Driveway into Mendoza property
  - d. Two buildings on Mendoza property
  - e. Two building on Bieber property



- f. Driveway into Beiber property
- g. Building on Department of Highway's property
- h. Parking Lot on Department of Highways Property
- i. Path on Department of Highway's property.

Please revise exhibit B to list these structures that are located within 200 feet of the affected land.

**Rule 6.3.3, Exhibit C – Mining Plan**

- 4.) Based on the soil series information, there appears to be about eight inches of topsoil material available for salvage at the site. Please revise the mining plan to indicate eight inches of topsoil will be salvaged at the site.
- 5.) Please clarify if the excavation face will be greater than a 3H:1V ratio? Or, will the material be excavated in such a way as the face of the excavation will never exceed a 3H:1V ratio?
- 6.) Please describe what limited processing may occur at the site (crushing, screening, washing... etc.)?

**Rule 6.3.4, Exhibit D – Reclamation Plan**

- 7.) Please revise Exhibit D to indicate that about eight inches of topsoil will be replaced at the site.
- 8.) Please explain how the seedbed will be prepared to eliminate compacted conditions (e.g. plowed, chiseled, disced).
- 9.) Item (I) in Exhibit C indicates the land will be reclaimed as rangeland, however the application form indicates the proposed post mine land use is pastureland, please clarify?

**Rule 6.3.5, Exhibit E – Map**

*Mining Plan Map*

- 10.) Please see item #3 above. Please depict and label the type of structure and owners of record of any permanent or man-made structure within 200 feet of the affected area.
- 11.) Please identify the owner of the substance to be mined and indicate this information on the mining plan map.

12.) Please update the mining plan map to depict the 25 foot buffer.

*Reclamation Plan Map*

13.) Please revise the map to include a note that indicates the thickness of topsoil to be replaced over the affected area.

**Rule 6.3.6, Exhibit F – List of Other Permit and Licenses Required**

14.) The Division recommends the operator contact the Colorado Department of Public Health and the Environment to ascertain if a stormwater permit will be needed for the site.

**Rule 6.3.12, Exhibit L – Permanent Man Made Structures**

15.) As discussed in Item #3 above, there are a number of other structures located within 200 feet of the affected land that were not identified in Exhibit B. For each of these structures, the applicant shall either:

- a. provide a notarized agreement between the Applicant and the Person(s) having an interest in the structure, that the Applicant is to provide compensation for any damage to the structure; or
- b. where such an agreement cannot be reached, the Applicant shall provide an appropriate engineering evaluation that demonstrates that such structure shall not be damaged by activities occurring at the mining operation; or
- c. where such structure is a utility, the applicant may supply a notarized letter, on utility letterhead, from the owner(s) of the utility that the mining and reclamation activities, as proposed, will have "no negative effect" on their utility.

If the applicant wishes to comply with the requirements of this rule using option "b", you must also provide evidence the applicant attempted to obtain structure damage agreements from the owners of record.

Randy Schafer  
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This concludes the Division's review of the application. The Division is required to issue a decision on the application by October 19, 2018. If you need additional time to address the items listed above, you must request an extension of the decision date in advance. If you have any questions feel free to contact me at (303) 866-3567, extension 8120.

Sincerely,

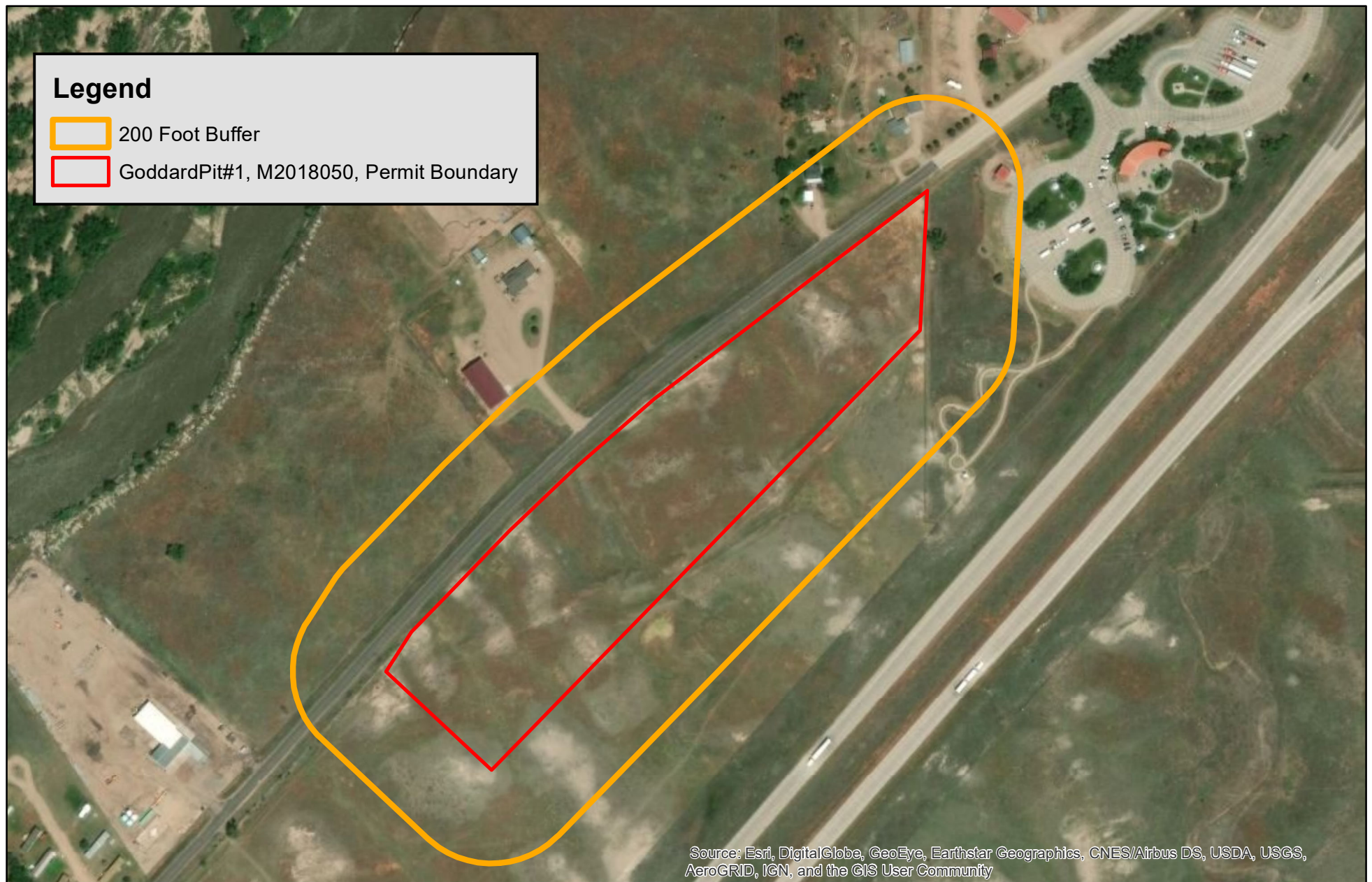
A handwritten signature in blue ink, appearing to read "Jared Ebert", with a stylized flourish at the end.

Jared Ebert  
Environmental Protection Specialist III

Enclosure: 1.) DRMS Buffer Zone Map, Dated October 11, 2018

CC: Allen Coyne  
Town of Julesburg  
100 West 2<sup>nd</sup> Street  
Julesburg, Colorado 80737

# Goddard Pit #1, M-2018-050, 200 Foot Buffer Map



0 250 500 1,000 Feet

Jared Ebert, DRMS  
October 11, 2018