

October 25, 2018

Steve Baker
3B Enterprises, LLC
P.O. Box 1665
Craig, CO 81626



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

1313 Sherman Street, Room 215
Denver, CO 80203

RE: Raftopoulos Pit #1, Permit No. M-1998-003, Unresolved Problem(s) Noted in a Past Inspection Report

Dear Mr. Baker:

Please see the enclosed inspection report for the above noted mine site. According to records kept by the Division of Reclamation, Mining and Safety the problem noted in this report remains unresolved. If the problem has already been corrected, documentation of the corrective actions taken to correct the problem must be submitted to our office.

To avoid potential future enforcement actions for non-compliance with State Statutes, Rules and Regulations, and/or conditions specified in your permit for this site, you must submit compliance documentation with the corrective actions by ***Thursday, November 29, 2018***.

If you require additional information, or have questions or concerns, please feel free to contact me. Amy Yeldell at the Division of Reclamation, Mining and Safety, 1313 Sherman St., Room 215, Denver, CO 80203. Direct contact can be made by phone at 970-254-8511 or via email at amy.yeldell@state.co.us

Sincerely,

Amy Yeldell
Environmental Protection Specialist

Cc:
Wally Erickson, Senior EPS, Grand Junction DRMS




**COLORADO**Division of Reclamation,
Mining and Safety

Department of Natural Resources

MINERALS PROGRAM INSPECTION REPORT**PHONE: (303) 866-3567**

The Division of Reclamation, Mining and Safety has conducted an inspection of the mining operation noted below. This report documents observations concerning compliance with the terms of the permit and applicable rules and regulations of the Mined Land Reclamation Board.

MINE NAME: Raftopoulos Pit #1	MINE/PROSPECTING ID#: M-1998-003	MINERAL: Sand and gravel	COUNTY: Moffat
INSPECTION TYPE: Monitoring	INSPECTOR(S): Amy C. Yeldell	INSP. DATE: August 7, 2018	INSP. TIME: 12:15
OPERATOR: 3B Enterprises, LLC	OPERATOR REPRESENTATIVE: None	TYPE OF OPERATION: 112c - Construction Regular Operation	
REASON FOR INSPECTION: Normal I&E Program	BOND CALCULATION TYPE: Complete Bond	BOND AMOUNT: \$31,727.00	
DATE OF COMPLAINT: NA	POST INSP. CONTACTS: DRMS	JOINT INSP. AGENCY: None	
WEATHER: Clear	INSPECTOR'S SIGNATURE: 	SIGNATURE DATE: August 14, 2018	

GENERAL INSPECTION TOPICS

The following list identifies the environmental and permit parameters inspected and gives a categorical evaluation of each

(AR) RECORDS----- <u>Y</u>	(FN) FINANCIAL WARRANTY----- <u>Y</u>	(RD) ROADS----- <u>Y</u>
(HB) HYDROLOGIC BALANCE----- <u>Y</u>	(BG) BACKFILL & GRADING----- <u>Y</u>	(EX) EXPLOSIVES----- <u>NA</u>
(PW) PROCESSING WASTE/TAILING---- <u>N</u>	(SF) PROCESSING FACILITIES----- <u>NA</u>	(TS) TOPSOIL----- <u>Y</u>
(MP) GENL MINE PLAN COMPLIANCE- <u>Y</u>	(FW) FISH & WILDLIFE----- <u>N</u>	(RV) REVEGETATION---- <u>PB</u>
(SM) SIGNS AND MARKERS----- <u>N</u>	(SP) STORM WATER MGT PLAN---- <u>Y</u>	(RS) RECL PLAN/COMP-- <u>Y</u>
(ES) OVERBURDEN/DEV. WASTE----- <u>N</u>	(SC) EROSION/SEDIMENTATION--- <u>Y</u>	(ST) STIPULATIONS----- <u>Y</u>
(AT) ACID OR TOXIC MATERIALS----- <u>NA</u>	(OD) OFF-SITE DAMAGE----- <u>N</u>	

Y = Inspected / N = Not inspected / NA = Not applicable to this operation / PB = Problem cited / PV = Possible violation cited

The following inspection topics were identified as having Problems or Possible Violations. OPERATORS SHOULD READ THE FOLLOWING PAGES CAREFULLY IN ORDER TO ASSURE COMPLIANCE WITH THE TERMS OF THE PERMIT AND APPLICABLE RULES AND REGULATIONS.

INSPECTION TOPIC: Revegetation

PROBLEM: There are state-listed noxious weeds present on site, specifically Halogeton. This is a problem for failure to employ weed control methods for state listed noxious weed species within the permitted area, and to reduce the spread of weeds to nearby areas as required Rule 3.1.10 (6).

CORRECTIVE ACTIONS: The operator should develop a weed control and management plan in accordance with Rule 3.1.10 (6). This plan should include specific control measures to be applied, a schedule for when control measures will be applied and a post-treatment monitoring plan. This weed control plan should be submitted to the Division as a Technical Revision to the approved plan with the appropriate Technical Revision fee of \$216.00 by the corrective action date.

CORRECTIVE ACTION DUE DATE: 10/15/18

OBSERVATIONS

This inspection was conducted as part of the Colorado Division of Reclamation, Mining and Safety normal monitoring program. The Raftopoulos Pit #1 is a 112c permitted site that includes a total of 15 permitted acres. It is located approximately 40 miles northeast of Craig and is accessed from Moffat County Road 4. No representative from 3B Enterprises, LLC was present during the inspection but they were contacted ahead of time. Amy Yeldell of the Division conducted the inspection.

The mine identification sign and affected area boundary markers are in place and in compliance with Rule 3.1.12. The sign was present but lying face down on the ground. The sign has been damaged from animals rubbing on the t-post. It will likely need to be replaced. Please replace/reattach the mine sign as soon as possible.

The site is currently not active. No equipment or fuel was on site. The upright water tank for dust suppression remains on site. Several large piles of stockpiles remain. The only activity appears to be selling out of existing stockpiles. There appears to be little to no changes to the existing highwall or additional reclamation.

Concrete with exposed rebar still remains on site. This site does not have an inert fill affidavit and will need to be removed prior to reclamation.

There was a large amount of Halogeton throughout the pit. This is cited as a problem. Please submit a weed management plan in the form of a technical revision by the corrective action date. The weed management plan should identify specific species of concern, methods of treatment and timing of those treatments. The Division also recommended that if timing is appropriate to treated all weeds on site.

The northeast section that has been graded remains bare of native vegetation. This area is mostly weeds. The Division recommends that this area be seeded so that desirable vegetation is established to try to help out compete the weeds. The western reclaimed area remains unchanged. This area is still mostly cheat grass and

other non-desirable species. This area would also benefit from reseeding.

Currently the Division holds a reclamation bond in the amount of \$31,727. In an effort to ensure the Financial Warranty adequately, reflects the actual current cost of fulfilling the requirements of the approved reclamation plan the Division will be updating the reclamation cost estimate. You will be notified under a separate cover if the current bond is found to be insufficient.

Responses to this inspection report should be directed to: Amy Yeldell at the Division of Reclamation, Mining and Safety, 1313 Sherman St., Room 215, Denver, CO 80203. Direct contact can be made by phone at 970-254-8511 or via email at amy.yeldell@state.co.us

Inspection Contact Address

Steve Baker
3B Enterprises, LLC
P.O. Box 1665
Craig, CO 81626

Enclosure

EC: Wally Erickson, Senior EPS, GJFO DRMS

PHOTOGRAPHS



