



Minerals Plan of Operations Inspection
U.S. Department of the Interior
Bureau of Land Management
Royal Gorge Field Office



The BLM has conducted an inspection of your operations, which concludes whether the documented operations on file with BLM are compliant or non-compliant. Any non-compliance issues are reported in the Additional Actions Necessary section of this inspection.

Operation Type: ☐ 3600 ☒ 3809 w/ occupancy ☐ 3809 w/o occupancy

Date: Nov 9, 2018 Time: 09:58 Weather: Sunny	Operation Name: Gold Tamers LLC Case Number: COC73930 CDRMS Number: M-2009-056
<u>Attendees</u> BLM: S. Carter & A. Sanderson Operator(s): Scheduled 10:00 am inspection with Matt Donnelly, but not present Other(s): None	<u>General</u> Operation(s) are in compliance with documentation on file <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A Operation(s) and disturbance on-site coincide with the operations and access on file <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A

Inspection Purpose: ☐ Pre-Operations ☐ General ☐ Final ☒ Compliance ☐ Trespass ☐ Complaint

Inspection Items	Compliant	Non-Compliant	N/A
1. Method of Operations			
Drilling, Trenching/Surface Excavation & Underground Excavation			
a. Drilling	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i. Pad Construction	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii. Mud Pits	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii. Borehole Abandonment/Monitoring Well Conversion	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> Complete <input type="checkbox"/> Incomplete			
iv. Pad Reclamation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Trenching/Surface Excavation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i. Trench/Excavation Construction	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Trench/Excavation Stability	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Trench/Excavation Reclamation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Underground Excavation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i. Portal Construction	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii. Blasting Operations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii. Portal Reclamation/Conversion of Entry	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Site Conditions			
a. Material/Waste Rock Management	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Erosion & Stormwater Control	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Man-made Structures	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Weed Management	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Safety Conditions	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Interim Reclamation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Inspection Items	Compliant	Non-Compliant	N/A
3. Housekeeping			
a. Container Management	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Spills/Leaks Observed	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Hazardous Substances/POL Management	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. General Housekeeping	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Access			
a. Road Management	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Berms	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Security	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Signage	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Surface Water Controls	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5. Quality Assurance/Quality Control			
a. Routine Site Conditions Monitoring	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Air, Water, Noise, Other Monitoring	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Monitoring Reporting	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Regulatory Submittals	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Other Agency/Entity Permits	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6. Final Reclamation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a. Exploration/Sampling Location	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Access Roads/Trails	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Grading	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Revegetation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Removal of Structures	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Free of Trash	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Additional Actions Necessary

Non-Compliance Issues to be addressed by Operator

Questions to be Addressed by the Operator

1.b. Non-compliant. Dirt work along the western boundary is not complete (Non-compliance #8 and #9). The previous inspection, on 10/08/18 stated this noncompliance item would be completed NLT 10/19/18. The dirt work was dependent upon the construction of the closed-loop pond for material processing.

- Is the pond construction complete?
- What plan does the operator have to comply with federal regulations?

2.a. Non-compliant. Ref. 1.b.i. & 1.b.ii.

2.b. *No stormwater controls are currently in place at the site. This needs to be done in accordance with the applicable stormwater management plan and State of CO issued permit. It isn't clear the status of these items at this time.

- What plan does the operator have to comply with federal and state regulations?

2.d. *Operations and interim management require monitoring and treatment of invasive plants (defined as plants that are not part of the original plant community that have the potential to come a dominant species at the site if not controlled).

- What plan does the operator have to comply with federal and state regulations?

2.e. Non-compliant. Ref. 1.b.i. & 1.b.ii.

3.a. Non-compliant. *Gasoline, diesel and kerosene POL containers are not properly stored on-site. A designated storage area with the addition of secondary containment vessels is required to prevent potential spills and/or leaks. Several containers were stored a few feet north of the water well within a kiddie pool. These containers were the only POLs stored within secondary containment. Best Management Practices suggest to store all POLs away from water resources. Note: No sheen was observed on water surfaces. *All POLs will need to be removed off-site prior to the seasonal shut-down. Generators will also need to be properly stored during non-operational seasons.

- Are the POL containers on-site utilized as marked (red – gasoline, yellow – diesel, blue – kerosene)?
- Does the operator have an interim management plan for POL containers and generators?

3.c. Non-compliant. * Ref. 3.a.

4.c. *Fence still has not been installed. The fence will need to be installed prior to the seasonal shut-down. In the Plan of Operations, the operational season is from the end of April to the end of November. In the previous inspection on 10/08/18, the fence would be installed around the operational perimeter NLT 10/19/18.

- When does the operator plan to install the fence?

4.e. Refer to 2.b. Above.

5.a-c. No documentation has been received yet. In the previous inspection on 10/08/18, BLM EXPLAINED TO MATT DONNELLY WHAT THIS WAS, WHAT NEEDED TO BE DONE AND THAT DOCUMENTATION IS REQUIRED.

- Does the operator have an interim management plan during the non-operational season?

5.d-e. A majority of permits are in place. Follow-up still needed on the following:

*Stormwater permit with State of Colorado - associated stormwater management plan, which will address 2.b. and 4.e.

*Driveway permit requested by Park County, Colorado, which will address 5.e.

Final Notes

General Comments:

I. Non-compliance items #1-10 that were included with the 07/05/18 BLM non-compliance order and still remain somewhat in non-compliance as of 11/09/18.

#7 Operator stated the pond liner would be either re-salvaged and stored in a general location or removed from the site NLT 10/19/18. As of 11/09/18 inspection, some of the pond liner on the western boundary was folded and stored, however portions of the pond liner located along the eastern trench and center open pit remain to be scattered and disorganized throughout the site. *Some of the folded pond liner has been stored outside the authorized boundary. Ref. image 20-25. The liner will need to be stored within the authorized boundary (Map 1; red boundary).

#8 As of 11/09/18, the dirt work noted as a non-compliance item for the past few months remains non-compliant. The remaining dirt was scheduled to be complete NLT 10/19/18. Ref. images 15-16.

#9 As of 11/09/18, the dirt work noted as a non-compliance item for the past few months remains non-compliant. The remaining dirt was scheduled to be complete NLT 10/19/18. Ref. images 17-19.

#10 To date, no monitoring/reporting has been submitted to BLM for the non-operational period. This requirement was explained to Matt during the 10/08/18 inspection. As of now, operations have been active, therefore this will not be a requirement. However, once the seasonal shutdown begins, the requirements for interim management will need to be met and an interim management plan filed with BLM.

THESE NON-COMPLIANCE ITEMS REQUIRE IMMEDIATE ACTION ON THE PART OF THE OPERATOR.

II. Items below are not categorized as non-compliant, however need to be addressed by the operator:

- Contacted the operator, Joe Widdison on 11/7/18 to inform him of the compliance inspection scheduled on 11/09/18. Matt Donnelly was to meet BLM on the above scheduled date, however Matt was not present. BLM was on-site from 10:00 am to 11:15 am.
- What is the current mining depth? Section D of the Mining Plan (6.3.3 Exhibit C, Section D, Construction Material Permit) states, “The maximum depth of the deposit is 120 feet. Present indications are for 25 feet in depth to be mined”. Mining depth is authorized for 25 feet, however if the mining depth is projected to increase, than a modification to the current Plan of Operations would be required.
- Inspection and monitoring plan is required during the non-operational season. Ref. 5.a-c. above.
- What is the purpose of the southern newly excavated trench? Ref. images 11-13. Will the old water storage channel, excavated prior to the Gold Tamer’s ownership be backfilled or further excavated?
- Are aggregate materials produced on-site? Multiple sorted aggregate stockpiles were observed during the 11/09/18 inspection. A commercial mineral materials contract is required for the removal of federal mineral materials (aggregate) from BLM managed lands. A commercial contract was mailed to the operator on 05/11/18. This contract will need to be signed by the operator, BLM Field Manager and a bond posted prior to the disposal of federal mineral materials.
- Park Co. Road Compliance: Park Co. requested the operator obtain a driveway permit to prevent flooding and degradation of Thompson Park Road (access road). It appears that the operator widened the entrance into the site which blocked the drainage channel along Thompson Park Road (ref. images 1-2). In Section G of the Mining Plan, an 18” x 40’ culvert would be installed where the access road meets Thompson Park Road. All drainage would be diverted toward the open pit.
- Equipment on-site: An equipment modification will need to be requested by the operator to the current Plan of Operations. The equipment on-site is the following:
 - Front-end Wheel Loader
 - Trackhoe Excavator
 - Conveyor Chute with Portable Feed Hopper
 - Articulated Rear Dump Truck
 - Old Hopper
 - Old Sluice Box
 - Grizzly
 - Aggregate Grate

*Reference the Mining Plan, 6.3.3 Exhibit C, Section E of the Construction Material Permit for the types of equipment authorized on-site.

Proprietary Information: None

Date inspection shared with CDRMS: 11/20/2018

Date inspection shared with Operator: 11/20/2018

Images

Image 1-2:



Comment: Before and after images of the entrance to the Field of Dreams mine site from Thompson Park Road. No culvert is present at the entrance in either image.

Image 3-6:





Comment: Nine POL containers are improperly stored along the eastern and southern boundaries of the site (images 3-5). Three generators will need to be stored in a designated area during the non-operational season. Bung-hole 55 gal. drum now labeled "TRASH" (image 4).

Image 7-10:



Comment: Newly excavated closed loop pond to circulate water during material processing. Multiple pumps and generators circulate the water while the grated sluice attached to the hopper sorts the material.

Images

Image 11-13:



Comment:

A newly excavated trench along the southern boundary has been dug. What is the purpose of this trench/channel? Is this trench a part of the water storage pond? Mineral materials stockpile located on the eastern portion of the excavated trench (image 13).

Image 14:



Comment: Noxious weeds located on the topsoil/ore stockpiles. Physical removal of invasive species on-site is authorized. Chemical treatment is only conducted by a BLM certified noxious weeds specialist.

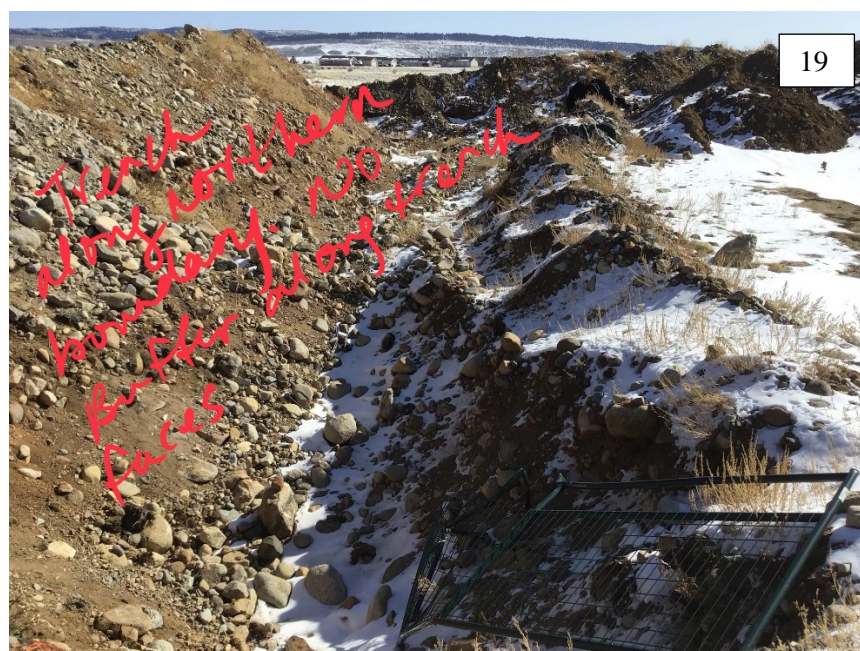
Images

Image 15-16:



Comment:
NW and SW stockpiles located outside of authorized operational boundary. Dirt work still remains in non-compliance.

Image 17-19:



Comment: Non-compliance #9. Trenches along the eastern and northern boundaries have steep slopes along both faces.

Images

Image 20-25:



Comment: No designated area for pond liner. Some of the pond liner has been folded and organized along the western boundary. Folded pond liner is located outside of the authorized boundary (image 25).

Image 26-31:

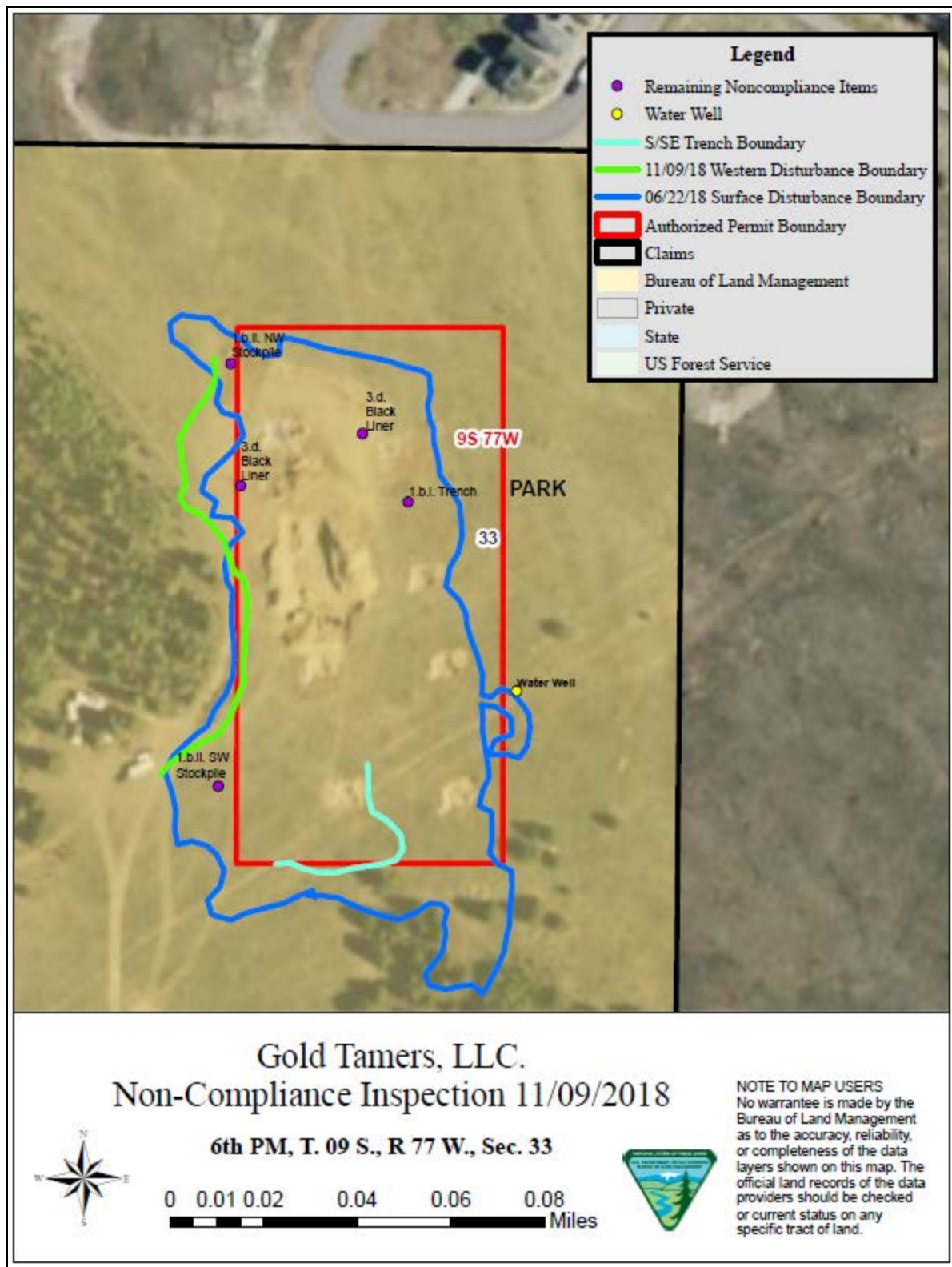


Comment: Equipment currently on-site.

Image 32:



Comment: Topsoil stockpile location in the center of the site?



Map 1: Surface disturbance along the western boundary collected during the 11/09/18 inspection. This boundary denotes the operator's recent dirt work to resolve non-compliance items #8 and #9. Non-compliance items that remain to be completed are labeled in purple.