




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: Bromley Lakes | MINE/PROSPECTING ID#: M-1987-049 | MINERAL: Sand and gravel | COUNTY: Adams |
| INSPECTION TYPE: Monitoring | INSPECTOR(S): Jared L. Ebert | INSP. DATE: 11/27/2018 | INSP. TIME: 09:00 |
| OPERATOR: Ready Mixed Concrete Company, LLC | OPERATOR REPRESENTATIVE: Joe Lamanna, Josh Oliver and Alex Schatz | TYPE OF OPERATION: 112c - Construction Regular Operation | |
| REASON FOR INSPECTION: Normal I&E Program | BOND CALCULATION TYPE: Partial Bond | BOND AMOUNT: \$4,168,740.00 | |
| DATE OF COMPLAINT: NA | POST INSP. CONTACTS: None | JOINT INSP. AGENCY: None | |
| WEATHER: Clear | INSPECTOR'S SIGNATURE:  | SIGNATURE DATE: December 6, 2018 | |

GENERAL INSPECTION TOPICS

This list identifies the environmental and permit parameters inspected and gives a categorical evaluation of each. No problems or possible violations were noted during the inspection. The mine operation was found to be in full compliance with Mineral Rules and Regulations of the Colorado Mined Land Reclamation Board for the Extraction of Construction Materials and/or for Hard Rock, Metal and Designated Mining Operations. Any person engaged in any mining operation shall notify the office of any failure or imminent failure, as soon as reasonably practicable after such person has knowledge of such condition or of any impoundment, embankment, or slope that poses a reasonable potential for danger to any persons or property or to the environment; or any environmental protection facility designed to contain or control chemicals or waste which are acid or toxic-forming, as identified in the permit.

| | | |
|---|---|----------------------------------|
| (AR) RECORDS----- <u>N</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>NA</u> | (SF) PROCESSING FACILITIES----- <u>NA</u> | (TS) TOPSOIL----- <u>Y</u> |
| (MP) GENL MINE PLAN COMPLIANCE- <u>Y</u> | (FW) FISH & WILDLIFE----- <u>NA</u> | (RV) REVEGETATION---- <u>N</u> |
| (SM) SIGNS AND MARKERS----- <u>Y</u> | (SP) STORM WATER MGT PLAN---- <u>NA</u> | (RS) RECL PLAN/COMP-- <u>Y</u> |
| (ES) OVERBURDEN/DEV. WASTE----- <u>NA</u> | (SC) EROSION/SEDIMENTATION--- <u>Y</u> | (ST) STIPULATIONS----- <u>NA</u> |
| (AT) ACID OR TOXIC MATERIALS----- <u>N</u> | (OD) OFF-SITE DAMAGE----- <u>Y</u> | |

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

OBSERVATIONS

This was a monitoring inspection of the Bromley Lakes site, Division of Reclamation, Mining and Safety ("DRMS" or "Division") permit number, M-1987-049, operated by Ready Mixed Concrete Company, LLC. ("RMCC"). I, Jared Ebert with DRMS conducted the inspection. Joe Lamanna with RMCC, Josh Oliver and Alex Schatz with Brannan Companies ("Brannan") accompanied me during the inspection.

This is a 287.80 acre 112c mining operation located in Adams County. Mining is complete at the site and the affected land is in the process of reclamation. The primary post-mining land use approved for the site is Developed water resources and wildlife habitat. The site consists of five different areas/phases or cells. The Bromley Lakes Cell No. 3 is a former pit excavation that has been reclaimed as a slurry wall lined water storage reservoir. The Phase 18 area was the location of the former processing facilities, per the approval of Technical Revision No. 8 (TR08) this area is to be reclaimed as upland wildlife habitat. Bromley Lakes Cell No. 2 was mined and backfilled completely and is approved to be reclaimed as upland wildlife habitat. The Phase 11 area consisted of a long land bridge across an adjacent water storage reservoir. This land bridge has been mined and no longer exists. The area known as the ARA Addition area was mined and reclaimed as upland wildlife habitat.

Backfilling and Grading:

The Phase 18 area and the Cell No. 2 area has been backfilled and graded to a relatively level area. This area appears stable. According to Mr. Lamanna, RMCC intends to seed the site early next spring.

Cell No. 3 was observed. The northern pit slopes appears to be graded to a steeper than 3H:1V angle above the water line. This issue was discussed with the Operator. They indicated they would survey or otherwise measure the slope to insure it is graded to the required 3H:1V angle. Some small rills and gullies were observed along the northern pit slope that should be monitored and stabilized if necessary. The western pit slope of Cell No. 3 appeared to be graded at the required 3H:1V angle. This slope was stable and vegetated. A significant portion of the southern pit slope of Cell No. 3 has eroded or cut to a near vertical to 1H:1V slope. This slope will need to be repaired and regraded to the required 3H:1V angle five feet above to ten feet below the water line. The eastern pit slopes appeared to be graded to a 3H:1V slope and was stable.

The ARA Addition area has been graded and seeded. The majority of the area has been graded relatively level with the back-slopes of the former pit area daylighting to the northwest. The back-sloped areas appear to be graded to a 3H:1V angle and were stable.

Financial Warranty:

The Division currently holds a financial warranty in the amount of \$4,168,740.00 in the form of a corporate surety. This amount is more than adequate to complete reclamation at the site.

Hydrologic Balance:

The McCanne Ditch has been relocated and appears functional.

The French Drain installed adjacent to the Spier Property appears to be functioning. Water was discharging from the drain into the McCanne Ditch. The two cleanout areas were observed on the northwest side of the Spier property.

Reclamation Success:

Little to no vegetation has established in the Phase 18 and Cell No. 2 area. However, RMCC plans on seeding these areas this spring.

Vegetation has begun to establish within the ARA area. Several species of grasses were observed, however it was difficult to determine the type of species established as the area has been mowed. Fairly dense establishment of annual forbs were observed throughout this area as is typical in the early stages of reclamation. The operator should continue to monitor this site as the desirable vegetation begins to establish.

Prior to bond release documentation will need to be submitted to the Division that the slurry wall around Cell No. 3 has passed the Office of the State Engineer leak test standards. Also, the Operator will need to insure the northern pit slopes are graded to the required 3H:1V ratio at least five feet above to ten feet below the water line. The southern pit slopes have eroded significantly and will need to be repaired and regraded.

Mr. Lamanna mentioned that the City of Brighton may desire to build a park and various recreational facilities in the Cell No. 2 area. Also, a scale, scale house, covered storage area and various stockpiles are located at the eastern end of the Phase 18 area. Mr. Lamanna indicated they may desire to leave this area for industrial use. It was discussed that RMCC would need to submit an amendment to the currently approved reclamation plan to change the post-mining land use and revise the reclamation plan to accommodate the changes for the Cell No. 2 and Phase 18 area.

Revegetation:

Tamarisk trees were observed along the western and southern pit slopes of the Cell No. 3 area. This issue was discussed with the Operator. These trees will need to be treated with an appropriate weed control method. It is likely many of these trees will be disturbed by the slope repair along the southern boundary of the reservoir but the Operator is encouraged to monitor this area and to conduct follow-up weed control after the earthwork is completed.

PHOTOGRAPHS



Figure 1. From the south end of Phase 18 looking north.



Figure 2. From the southern end of the Cell No. 2 area looking northwest.



Figure 3. Steep cut at the south slope of the Cell No. 3 reservoir.



Figure 4. French Drain discharging at the McCanne Ditch.



Figure 5. South end of the ARA Addition area looking southeast.

Inspection Contact Address

Joe Lamanna
Ready Mixed Concrete Company, LLC
11778 Highway 52
Fort Lupton, CO 80621