



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

July 8, 2019

Steve and Joyce Wright
Arboles Sand & Stone, LLC
12577 Highway 151
Pagosa Springs, CO 81147

Re: Lob Lolly Pit, Permit M-2013-066 Notice of Receipt, Technical Revision TR-1

Steve and Joyce Wright:

On June 27, 2019, the Division of Reclamation, Mining and Safety received your Technical Revision application **TR-1** and the required fee for the Lob Lolly Pit Permit **M-2013-066**, which is located in Archuleta County. The revision requested addresses the following items:

- *Update changes to the North Parcel and reflect final configuration in the South Parcel. Also provide additional information on seeding and other matters in response to 2019 Inspection.*

During the review of the material submitted, the Division determined that the following issues of concern must be adequately addressed before the revision can be considered for approval.

1. The revised Annual Map that was submitted for the North Area does not accurately depict the current conditions of the site. Information and imagery obtained from the Archuleta County Assessors website match the current conditions which includes the existence of a third pond as well as significantly more disturbed area. The images are enclosed with this letter. Please update and re-submit the Annual Report Map for the North Parcel as well as update the corresponding table to account for the increased disturbance, and identify increases in required top soiling and seeding tasks.
2. The table corresponding to the North Parcel indicates that excavation and shaping of the ponds will be done without dewatering. This method will not be acceptable because it is impossible to accurately verify the final grade is 3:1 for at 15 feet below the water surface pursuant to Construction Materials Rule 3.1.5(7). The ponds will need to be at least partially dewatered to allow for grading of the pond slopes so that the resulting grade is 3:1 for at least 15 feet below the estimated static water level in the ponds. For each of the ponds please identify their depth, estimated recharge rate, and any relevant pumping information.



3. In the updates to the Mining Plan and Reclamation Plan the requested information was not provided. Please provide the current length and height of the exposed highwall in Pond 1 and include a commitment of the maximum length of highwall to be exposed at any given time. Please also include the total area, in acres, to be ripped and the depth of topsoil to be replaced on all areas of the North Parcel.
4. The maximum allowed disturbance allowed in the Permit File is 15 acres however the current estimated disturbance is +/- 45 acres. Please include a statement about the total currently affected areas, and a commitment to the total number of acres to be affected at any given time. Affected lands are considered disturbed until the proper vegetative cover has been established.
5. The Updates to Exhibit J identifies 12.7 acres of the South Parcel to be seeded with the irrigated/semi irrigated mix however the table indicates the total to be 17.5 and no estimate on the number of acres to be seeded with the grazing mix. Similarly, no estimate of areas to be revegetated in the North Parcel was included. Please provide more details of the revegetation plan including the total number of acres in each parcel to be revegetated with each seed mix.

Details were also included about potential future industrial commercial uses of areas within the South Parcel. Please note that any and all deviations from the current reclamation plan will need to be addressed through the Technical Revision or Amendment processes.

The current decision date for this Technical Revision is Wednesday August 7, 2019. Please submit your responses to the above listed items no later than Wednesday July 31, 2019 to allow sufficient time for review. The Division will continue to review your application for technical adequacy and will contact you if more information is needed. If you have any questions, comments or concerns please feel free to contact me at the Division's Grand Junction Field Office, by phone at 303-866-3567 Ext. 8187 or by email at lucas.west@state.co.us.

Sincerely,



Lucas J. West
Environmental Protection Specialist

Ec: Nathan Barton, Wasteline Inc.



Legend

- Parcels
- Mile Markers
- Highways
- State
- US
- Primary
- Secondary
- County Roads
- Roads
- Archuleta Boundary
- Places
- Subdivision Labels
- Subdivisions
- Archuleta County Boundary
- Town of Pagosa Springs

Ponds
Web Print 07/08/2019



This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable.



