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: Blue Grass Gravel Pit	**MINE/PROSPECTING ID#:** M-2008-001	**MINERAL:** Sand, gravel,borrow	**COUNTY:** Pueblo
INSPECTION TYPE: Monitoring	**INSPECTOR(S):** Elliott R. Russell	**INSP. DATE:** May 23, 2018 June 1, 2018	**INSP. TIME:** 10:00
OPERATOR: EWSD I, LLC	**OPERATOR REPRESENTATIVE:** Steven Turesky	**TYPE OF OPERATION:** 112c - Construction Regular Operation	

REASON FOR INSPECTION: Normal I&E Program	**BOND CALCULATION TYPE:** Complete Bond	**BOND AMOUNT:** $20,700.00
DATE OF COMPLAINT: NA	**POST INSP. CONTACTS:** None	**JOINT INSP. AGENCY:** None
WEATHER: Clear	**INSPECTOR'S SIGNATURE:**	**SIGNATURE DATE:** August 10, 2018

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. If a Possible Violation is indicated, you will be notified under separate cover as to when the Mined Land Reclamation Board will consider possible enforcement action.

GENERAL INSPECTION TOPICS

The following list identifies the environmental and permit parameters inspected

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

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

PROBLEMS/POSSIBLE VIOLATIONS

INSPECTION TOPIC: Revegetation
COMPLIANCE PROBLEM: Tamarisk (salt cedar) trees are present within or have volunteered into the permit area and are becoming established. This is a problem for failure to employ weed control methods for a state listed noxious weed species within the permitted area, and to reduce the spread of weeds to nearby areas as required by Rule 3.1.10 (6).
CORRECTIVE ACTIONS: The operator shall employ weed control methods for the tamarisk trees. The operator shall submit photo documentation of the tamarisk by the corrective action date.
CORRECTIVE ACTION DUE DATE: October 9, 2018

INSPECTION TOPIC: Signs & Markers
COMPLIANCE PROBLEM: The mine identification sign was not properly posted at the entrance of the mine site. This is a problem for failure to post a mine identification sign as required by Rule 3.1.12(1).
CORRECTIVE ACTIONS: The operator shall, at the entrance of the mine site, post a sign which shall be clearly visible from the access road with the following: the name of the operator, a statement that a reclamation permit for the operation has been issued by the Colorado Mined Land Reclamation Board; and the permit number. The operator shall submit photo documentation that a proper sign has been posted by the corrective action date.
CORRECTIVE ACTION DUE DATE: October 9, 2018

OBSERVATIONS

This inspection was conducted as part of the Division's routine monitoring program for permitted operations. Elliott Russell, with the Division, conducted the inspection while Steven Turesky, representing the Operator, accompanied the inspection.

The Blue Grass Gravel Gravel Pit is a Construction Material Regular 112c Operation Reclamation Permit and is approved to affect 323 acres of land. Affected lands will be reclaimed to support a developed water resource post-mining land use. The site is located nine miles east of Pueblo, Colorado. The site consists of two main areas, an east and a west pivot fields proposed to be mined and developed into water reservoirs. The site has not initialed excavation activities since the permit has been issued. The only mining activity that appears to have been initiated was an area, approximately 18 acres in size, where topsoil had been stripped for preparation of excavation. This area, located in the southern portion of the eastern half of the permit, has now had the topsoil replaced.

Availability Of Records: The anniversary date of the permit is November 21st of each year. The 2016 – 2017 Annual Report, Map and Fees was submitted on October 31, 2017. The previous inspection was on April 24, 2015. There are no open infractions.

The site is in Temporary Cessation (TC-01) and therefore was not active at the time of the inspection. TC-01 was approved on January 15, 2014. The first 5-year period of began on November 21, 2013 and will end November 21, 2018. After TC-01 ends, the Operator should re-initiate mining activities, begin final reclamation and move the site toward a future release, or submit a request for TC-02 in accordance with Rule 1.13.5(3). The Operator should formally notify the Division with their intent for the permit. Please note, if reclamation activities commence, the Operator will have until November 21, 2023 to complete the reclamation and request a

release of the permit in accordance with Rule 3.1.3.

Financial Warranty: The $20,700 bond held by the Division was reviewed for adequacy as a part of the inspection. The bond amount is sufficient to cover the cost of the remaining reclamation work at the site which includes the revegetation of the disturbed 18-acre area.

Revegetation: The 18-acre disturbance mainly consists of annual weeds. This area will likely need to be mowed, tilled, and planted with the enclosed approved seed mixture if reclamation is initiated after TC-01 ends. The Division observed Tamarisk (also known as Salt Cedar) establishing on the site in two low areas along the west side of the eastern permit area. Tamarisk is a noxious weed List B species, and therefore has been cited as a compliance problem requiring corrective action. The Division has enclosed a noxious weed factsheet on tamarisk for the Operator's reference regarding treatment.

Sediment Control: No erosion problems were observed and no BMPs were needed at the time of the inspection.

Signs and Markers: The permit sign was posted at the northern access point to the eastern permit area, however, the sign still identifies the previous Operator. This has been cited as a compliance problem requiring corrective action. Boundary markers were observed to delineate the permit boundary.

This concludes the Division's Inspection Report; a subset of photographs taken during the time of the inspection are included below. If you need additional information or have any questions, please contact me at Division of Reclamation, Mining and Safety, 1313 Sherman Street, Room 215, Denver, CO 80203, by telephone at **303-866-3567 x8132**, or by email at elliott.russell@state.co.us.

PHOTOGRAPHS

Photo 1. Mine identification sign, new Operator name needed; looking south.

Photo 2. Disturbed area in the southeast portion of the permit; looking southeast.

Photo 3. Tamarisk observed along the western portion of the eastern mining area; looking southwest.

Photo 4. Additional tamarisk observed along the western portion of the eastern mining area; looking northwest.

Inspection Contact Address
Anthony Adza
EWSD I, LLC
633 West 5th Street, 28th Floor
Los Angeles, CA 90071

CC: Michael Cunningham with DRMS

Species	Variety	#/Acre PLS*
Western wheatgrass Variety rosana	Rosana, or Arriba	3.3
switchgrass	Blackwell or Alamo	3.3
alkali sacaton	Salado	3.3
Total PLS/acre		±9.9

*Seeding rates are given in pound of Pure Live Seed (PLS**)

(The three listed grass species show some of the highest average production based on the NRCS Ecological Site Description and should therefore help ensure the Reclamation Plan goals of site stability and erosion control.)

** PLS = purity X germination

(iii) Soil amendments: As stated previously, the NRCS recommends 40 lbs. of nitrogen and phosphorous per acre. Well-cured feedlot/barnyard manure is recommended and may be used if readily available and will be applied at the rate of twenty tons per acre.

(iv) Tree and shrubs planting: Deeply rooted species are not recommended in areas where slurry walls or earthen dams are constructed. None will be planted.

(v) Topsoil replacement depth: Topsoil will be replaced to an average depth of 6 inches, some areas receiving more, some less.

Saltcedar

Tamarix spp.

Colorado Department of Agriculture

305 Interlocken Pkwy
Broomfield, CO 80021

(303) 869-9030
weeds@state.co.us

Saltcedar Identification and Management

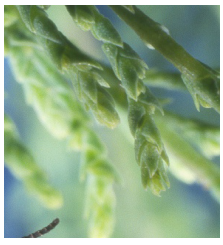
Identification and Impacts

Saltcedar, or tamarisk (*Tamarix spp.*), is a non-native deciduous evergreen shrub or small tree that grows from 5 to 20 feet tall. The bark on saplings and stems is reddish-brown. The leaves are small, scale-like and bluish-green in color. Tiny pink to white flowers have five petals and grow on slender racemes. Saltcedar reproduces by seeds as well as vegetatively. A mature plant can produce up to 600,000 seeds per year. Seeds are viable for up to 45 days under ideal conditions. Saltcedar buds break dormancy in February or March. Flowering occurs anytime between April and August. Ideal conditions for saltcedar seedling survival are saturated soil during the first few weeks of life, a high water table, and open sunny ground with little competition from other plants.

Saltcedar was introduced from central Asia, northern Africa, and southern Europe for ornamental purposes and for stream bank stabilization. It is now widespread in the United States. Saltcedar crowds out native stands of riparian and wetland vegetation. Saltcedar increases salinity of surface soil, rendering the soil inhospitable to native plant species. Saltcedar can be found along floodplains, riverbanks, streambanks, marshes, and irrigation ditches. It's heavy use of water has contributed to the intensity of the drought.

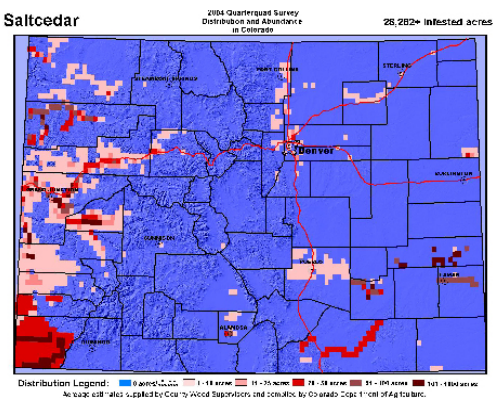
The most effective method of control for saltcedar is to prevent its establishment through proper land management. Monitor susceptible areas for new infestations. An integrated weed management approach has proven to be an effective control when dealing with saltcedar. Details on the back of this sheet can help to create a management plan compatible with your site ecology.

Saltcedar is designated as a "List B" species on the Colorado Noxious Weed Act. It is required to be either eradicated, contained, or suppressed depending on the local infestations. For more information, please visit www.colorado.gov/ag/csd and click on the Noxious Weed Program link. Or call the State Weed Coordinator of the Colorado Department of Agriculture, Conservation Services Division, 303-239-4100.



Key ID Points

1. Saltcedar is a tall shrub or small tree that has white to pink flowers in clusters called racimes.
2. Leaves are small and scaly.



Plant and flower photos © Kelly Uhing. Leaf photo © USDA Aphis PPQ. Infestation photo above, © Steve Dewey, Invasive.org. Tamarisk branch © Stevens County, WA Noxious Weed Control Board

Updated on:
07/2015

Management Recomendations

CULTURAL
After a saltcedar infestation is managed, revegetation is necessary in order to protect the soil resource and reduce the threat of reinvasion. Seeded grasses, willow stakes, and cottonwood cuttings can reduce the chances of saltcedar reinvading managed sites.

BIOLOGICAL
The saltcedar leaf beetle (*Diorhabda elongata*) larvae and adults feed on foliage. This causes stem dieback and potential death of the plant if defoliation is consistent. The leaf beetle should be available for limited distribution. For more information, contact the Palisade Insectary of the Colorado Department of Agriculture, 970-464-7916.

MECHANICAL
A bulldozer or prescribed fire can be used to open up large stands of saltcedar. These methods must be followed up with a herbicide treatment of the resprouts when they are 1 to 2 meters tall. Chainsaws, or loppers for smaller plants, are effective for cut-stump treatments to smaller infestations or in environmentally-sensitive management areas.

Integrated Weed Management:

Select the appropriate control method based on the size of the area and other environmental or cultural considerations. Re-seed controlled areas with desirable species to protect the soil resource and to prevent or slow saltcedar reinvasion. Follow up control efforts the same growing season and for several years afterwards.

Saltcedar

HERBICIDES: The following are recommendations for herbicides that can be applied to range and pasturelands. Rates are approximate and based on hand-held equipment with an output of 30 gallons per acre. Always read, understand, and follow the label directions. **The herbicide label is the LAW!**

Herbicide	Rate	Application Timing
Triclopyr (Garlon 4, Remedy)	20-30% solution in basal bark oil. The herbicide Pathfinder comes pre-mixed in oil and does not require dilution.	Cut-Stump Treatment: Apply to the cambial layer of the tree immediately after the cut-stump treatment and to roots above soil surface. (Summer to fall) Basal Bark Treatment: Spray till wet but not dripping; the roots above soil surface, root collar, and lower trunk to a height of 12-15 inches above ground (Summer to fall)
Glyphosate* (Rodeo - approved aquatic label)	Undiluted (100% solution) or 50% solution in basil bark oil	Cut-Stump Treatment: Apply to the cambial layer of the tree immediately after the cut-stump treatment and to roots above soil surface. Diluted solutions requires regular agitation. (Summer to fall)
Triclopyr (Garlon 4, Remedy) + Aminopyralid (Milestone)	3 qts. Garlon 4/acre + 7 oz. Milestone/acre + 0.25% v/v non-ionic surfactant	Broadcast foliar treatment: Apply when plants are growing rapidly. (May to September)
Note: *These products are non-selective and will kill any vegetation contacted.		
Additional herbicide recommendations for other species can be found at: **goo.gl/TvWnv9**		