



COLORADO
**Division of Reclamation,
Mining and Safety**
Department of Natural Resources
1313 Sherman Street, Room 215
Denver, CO 80203

October 29, 2019

Mike Anson
Moffat Limestone Company
P.O. Box 777
Craig, CO 81626

RE: Juniper Mountain Gravel, Permit No. M-2003-073, Unresolved Problem(s) Noted in a Past Inspection Report

Dear Mr. Anson:

According to records kept by the Division of Reclamation, Mining and Safety, some problem(s) noted in a past mine site inspection report have not been corrected. If the problem(s) have already been corrected, documentation of the corrective actions taken to correct the problem(s) must be submitted to our office.

Please see the enclosed inspection report for the above noted mine site, issued as a result of a past inspection of this site. Problems noted in this report that remain unresolved according to our records, have been highlighted.

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 **Friday, November 29, 2019**.

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 303-866-3567 Ext 8183 or via email at amy.yeldell@state.co.us

Sincerely,

Amy Yeldell
Environmental Protection Specialist


Cc: Travis Marshall, Senior EPS, Grand Junction DRMS





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: Juniper Mountain Gravel	MINE/PROSPECTING ID#: M-2003-073	MINERAL: Gravel	COUNTY: Moffat
INSPECTION TYPE: Monitoring	INSPECTOR(S): Amy C. Yeldell	INSP. DATE: July 10, 2019	INSP. TIME: 14:45
OPERATOR: Moffat Limestone Company	OPERATOR REPRESENTATIVE: Mike Anson	TYPE OF OPERATION: 112c - Construction Regular Operation	
REASON FOR INSPECTION: Normal I&E Program	BOND CALCULATION TYPE: Complete Bond	BOND AMOUNT: \$28,135.00	
DATE OF COMPLAINT: NA	POST INSP. CONTACTS: None	JOINT INSP. AGENCY: None	
WEATHER: Clear	INSPECTOR'S SIGNATURE: 	SIGNATURE DATE: August 16, 2019	

Several of the following inspection topics were identified as having a **Problem (PB)**, which includes correction actions and a deadline whereby the Operator must demonstrate compliance with the conditions of the Permit and the requirements of the Act and Rules. Failure to address the corrective actions by the deadline may cause the Division to escalate the Problem to a **Possible Violation (PV)** and schedule the issue for formal hearing before the Mined Land Reclamation Board (Board).

GENERAL INSPECTION TOPICS

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

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

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

INSPECTION TOPIC: Availability Of Records

PROBLEM/POSSIBLE VIOLATION: Problem: Rule 1.13.5 states, if an Operator temporarily ceases production of the mining operation for one hundred eighty (180) days or more, the Operator must file a Notice of Temporary Cessation in writing to the Office.

CORRECTIVE ACTIONS: The Division recommends the Operator file for Temporary Cessation. The start date of the initial 5 year Temporary Cessation period is retroactive to the last date the pit was active. If that date is more than 5 years ago, the operator is required ask the Board for a 5 year extension to the Temporary Cessation period (per rule 1.13.5 (3) and 1.13.8 (b) or begin reclamation.

CORRECTIVE ACTION DUE DATE: 10/15/19

INSPECTION TOPIC: Revegetation

PROBLEM/POSSIBLE VIOLATION: Problem: There are state-listed noxious weeds present on site. 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 by Section 3.1.10 (6) of the rule.

CORRECTIVE ACTIONS: Implement approved weed control plan and provide proof to the Division that this has been done. If a weed control plan is not already in place, the operator shall develop a weed control and management plan in accordance with Section 3.1.10 (6) of the Rule. This plan should be developed in consultation with the county extension agency, or weed control district office and 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 shall 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: 10/15/19

OBSERVATIONS

This inspection was conducted as part of the Colorado Division of Reclamation, Mining and Safety normal monitoring program. The Juniper Mountain Gravel site is a 112c gravel operation that consists of 60 acres with a max disturbance of 5 acres. Mike Anson represented the operator and accompanied Amy Yeldell of the Division on the inspection. The site is located in Moffat County approximately two mile southeast of Maybell, Colorado and is accessed from Moffat County Road 57.

The mine identification sign and affected area boundary markers are in place and in compliance with Rule 3.1.12. The mine sign was located at the main entrance as you leave CR 57.

The site was inactive at the time of the inspection. This site is approved for intermittent operations however the site does not appear to be operating annually. The 2019 annual report indicated that the site has yet to commence operation. In follow up conversations with the Operator the site has been inactive since taken under new ownership in 2014. For clarifications if the site has ever been active, the operation has commenced with regards to filling out the annual report. Active status requires mining annually more than 180 days. Intermittent Status allows for less than 180 days of activity but actively annually. If the mine ceases production for more than a year it shall go into temporary cessation. Inactivity is cited as an inspection problem. The Operator shall request Temporary Cessation Status or enter into final reclamation by the corrective action date.

The active portion of the mine site still remains within the 5 acre footprint. The reclaimed portions associated with TR-3 and reducing the overall liability has had poor success. Only a small portion of the reclaimed areas has established vegetation. The majority of the reclaimed areas remains bare or has mostly undesirable vegetation growing. This site would likely benefit from a secondary seeding of areas with poor reclamation success thus far.

Large amounts of scotch thistle were observed throughout the site. This site has a Noxious Weed Management Plan (TR-1). Failure to control noxious weeds is cited as an inspection problem. Please submit photo documentation that noxious weeds have been treated by the corrective action date. If the current noxious weed management plan is inadequate the Operator may also revise their plan in the form of a technical revision by the corrective action date.

No fuel, buildings or other miscellaneous debris was stored on site. All highwalls were sloped 3H: 1V or less. The Division currently requires a financial warranty amount of \$28,135 for this site. The bond was last recalculated with SR-1 in 2018. 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. If the current bond is found to be insufficient the Division will send a Notice of Surety Increase under a separate cover.

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 303-866-3567 Ext 8183 or via email at amy.yeldell@state.co.us

Inspection Contact Address

Mike Anson
Moffat Limestone Company
P O Box 777
Craig, CO 81626

Enclosure

EC: Travis Marshall, Senior EPS, GJFO DRMS

PHOTOGRAPHS



