



Holcim (US) Inc.  
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January 7, 2020

**Submitted via Email**

Mr. Timothy Crazier  
Colorado Division of Reclamation, Mining, and Safety  
1313 Sherman Street, #215  
Denver, Colorado 80203

**Re: Holcim (US) Inc. Portland Plant – Notice of Alleged Violation and Notice of Board  
Hearing Response for the Coaldale Gypsum Quarry, Permit M-1977-247**

Dear Mr. Crazier:

Holcim (US) Inc. ("Holcim") acknowledges receipt of the above-referenced Notice of Alleged Violation (NOAV) (mailing date December 4, 2019) directed to its Coaldale Gypsum Quarry in Coaldale, CO ("Quarry"). In short, the NOAV asserts a potential violation of C.R.S. 34-32.5-115(4)(i) for "failure to protect areas outside of the affected land from slides or damages occurring during mining operation and reclamation" based upon inspections conducted in June and November of 2019. The NOAV further sets a hearing date for January 22, 2020 to consider the possible violation. In advance of the hearing, Holcim wishes to offer its initial response in the hope that its response might facilitate productive discussions between Holcim, Division, and the public at large.

Holcim has evaluated the permitted boundary and operational areas at the Quarry and agrees that top soil has been pushed outside the permitted area. Since the issue was brought to our attention in the NOAV, Holcim has initiated efforts to bring the Quarry back into compliance with all applicable laws and regulations. Holcim estimates that approximately 7,000 tonnes of excess top soil was pushed outside the Quarry permitted boundary. As such, we are currently in the process of contracting with an independent firm to move the excess material back within the permitted boundary and contour the affected area. The Quarry is a seasonal operation and therefore operates only two to three months each year. As such, the site is nonoperational and unmanned (except for hauling of gypsum to the Portland Plant) for most of the year, so equipment needs to be moved to the site, and all work is extremely dependent upon the unpredictable weather in the Coaldale area. However, if so approved, we anticipate all work to be completed by the end of March.

Additionally, Holcim acknowledges that the affected area will need to be reclaimed and returned to as close an unaffected condition as soon as possible. Therefore, we are also in the process of obtaining bids to reseed/revegetate the affected area. In anticipation that top soil will assuredly be needed for the reseeding process, before any work is done at the Quarry, Holcim will evaluate how much potential top soil may be needed for reseeding and leave and contour only the amount needed for a successful revegetation. Due to weather, reseeding will not take place until the spring planting season begins.

In order to prevent a reoccurrence of this issue, Holcim will ensure the permitted boundary is properly designated and marked with signage. Additionally, all personnel (internal and external) will be retrained on the importance of only operating within permitted areas of the Quarry.

In summary, Holcim acknowledges the noncompliance issue and believes it has taken appropriate corrective actions and to eliminate a reoccurrence. If you have any questions regarding this response prior to the public hearing, please do not hesitate to contact me via telephone at 719-288-1420 or via email at [julio.villon@lafargeholcim.com](mailto:julio.villon@lafargeholcim.com).

Regards,

Julio Villon  
Quarry Manager