



October 13, 2020

Scott Johnson
Summit Engineering Company
P.O. Box 1897
Alamosa, CO 81101

***RE: Robbins Rock Pit, File No. M-2009-053 , Construction Materials Regular (112) Conversion
Application Adequacy Review***

Dear Mr. Johnson:

The Division of Reclamation, Mining and Safety (Division) is in the process of reviewing the above referenced application in order to ensure that it adequately satisfies the requirements of the Colorado Land Reclamation Act for the Extraction of Construction Materials (Act) and the associated Mineral Rules and Regulations of the Colorado Mined Land Reclamation Board for the Extraction of Construction Materials (Rules). During review of the material submitted, the Division determined that the following issue(s) of concern shall be adequately addressed before the application can be considered for approval.

1. Exhibit D- Mining Plan

- a. Pursuant to Rule 6.4.4(d), please identify the maximum height and length of the highwall to be exposed at any given time. This information should also be included in exhibit E- Reclamation Plan to calculate volumes of material to be moved to achieve the final reclamation configuration. Please also include the maximum depth to be mined, this is reflected on the maps however please include it in the narrative. This information will also be used to ensure an accurate reclamation cost estimate.
- b. Using a narrative and or a stratigraphic map of the permit area please identify the nature, approximate depth and thickness of the deposit to be mined as well as a description of the stratum immediately beneath the material to be mined in accordance with Rule 6.4.4 (f) (i) and (ii).

2. Exhibit E- Reclamation Plan

- a. Exhibit D indicates that the mining will be conducted using a highwall to harvest native rock and exhibit E states that the reclaimed slopes will not exceed 3:1. Pursuant to Rule 6.4.5(f)(i) please identify how the 3:1 slopes will be achieved, whether by backfill or blasting and slot dozing prior to topsoil replacement.
- b. In accordance with Rule 6.4.5 (f)(iii) please identify if any form of fertilizer will be used during the revegetation phase of reclamation. If so, please identify the type, rate and application method that will be used.

3. Exhibit G- Water Information



- a. It is stated in Exhibit G that there is an existing exempt commercial well on the property. Please clarify the location of the well on the Mining and Reclamation Plan Maps. Please also identify the owner of the well, if the well is not owned by the applicant please provide a structure agreement as well as include it in Exhibit S, Permanent Man-Made Structures. Similarly, it is stated that approximately 1 acre-foot of water will be used annually for the operation. Please clarify if that water is drawn from the commercial well on the property or if it must be obtained from an outside source.

4. Exhibit J – Vegetation Information

- a. While the information is somewhat duplicative of the information in Exhibit E, please update Exhibit J to include descriptions of present vegetation types and quantitative estimates of cover pursuant to Rule 6.4.10 (1).

5. Exhibit L- Reclamation Costs

- a. In addition to Items 1, a; 2, a and b, please provide the information in Exhibit L. Please also include details of the Topsoil Replacement phase of the reclamation efforts to include placement method, depth and average haul distance. This information will ensure an accurate reclamation cost estimate for the conversion application.

Please submit your responses to the above listed issues by Tuesday, November 10, 2020 in order to allow the Division sufficient time for review. The decision date for your conversion application is set at November 24, 2020, should you require more time to respond to the issues in this review please submit a Decision Date Extension Request in writing to the Division. If no response is submitted by the Decision Date your application may be denied. The Division will continue to review your application and will contact you if additional information is needed.

If you have questions 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 West
Environmental Protection Specialist
Division of Reclamation, Mining and Safety

Cc: Travis Marshall, Senior Environmental Protection Specialist

Ec: Scott Johnson, Summit Engineering Company
Randy Robbins, Robbins Construction LLLP.