



October 21, 2020

Mr. Julio Villon  
Holcim (US) Inc.  
3500 Highway 120  
Florence, CO 81226

**RE: Coaldale Quarry, Permit No. M-1977-247;  
Third Adequacy Review Amendment 3 (AM-3)**

Dear Mr. Villon:

The Division of Reclamation, Mining and Safety (DRMS) has completed its review of your October 2, 2020 response to our August 13, 2020 Second Adequacy Review (SAR) letter for your Amendment Application (AM-03) for the Coaldale Quarry, Permit No. M-1977-247. The decision date for this application was extended to October 30, 2020. Please be advised that if you are unable to satisfactorily address any concerns identified in this review before the decision date, it will be your responsibility to request an extension of the review period. If there are outstanding issues that have not been adequately addressed prior to the end of the review period, and no extension has been requested, the DRMS may deny this application.

The comment numbers from the original adequacy letter have been retained for tracking purposes. The following items must be addressed by the applicant in order to satisfy the requirements of C.R.S. 34-32.5-101 et seq. and the Mineral Rules and Regulations of the Mined Land Reclamation Board:

#### **6.4 SPECIFIC EXHIBIT REQUIREMENTS – REGULAR 112 OPERATIONS**

##### **6.4.3 EXHIBIT C – Pre-mining & Mining Plan Map(s) of Affected Lands**

8. Exhibit C-1 Vegetation. The Response is adequate.

##### **6.4.5 EXHIBIT E – Reclamation Plan**

10. Reclamation Plan. The Response is adequate.

##### **6.4.6 EXHIBIT F – Reclamation Plan Map**

12. Map Omissions. The Response requires additional clarification. The additional Exhibit F figures F2A, F2B, F3A and F3B provide some clarification to the proposed reclamation plan. Figure F-1 indicates there are 3.9 acres of road to be reclaimed. Figures F-2B and F-3B indicate another 10.3 and 5.7 acres of pit floor respectively, are to be reclaimed. This totals 19.9 acres. Exhibit L indicates 101 acres will be vegetated, while the Application form states the total permit area is 194.2 acres. Exhibits C-1 and



F-1 indicate there are areas within the permit boundary that will not be disturbed (e.g. the northwest end of the permit area has about 15 acres that apparently will not be disturbed, and some area surrounding Titanium Hill also appears to have no plans for disturbance). The DRMS needs to know what areas will be affected and how each area is proposed to be reclaimed in order to estimate the reclamation liability. The benches on Figures F-2B and -3B and the waste rack stockpile on Figure F-3B are expected to account for a significant portion of the 81.1 unaccounted for area in the reclamation plan, but it is not stated how much of this area falls into these two categories of reclamation. Furthermore, the 93.2 acres that apparently will not be disturbed within the permit area needs to be delineated between both Exhibits C and F maps. Please provide the following:

- a. Revisions or additions to Exhibits C and F accounting for all 101 acres requiring revegetation. If there are areas in addition to the 101 acres in Exhibit L that require earthwork or other reclamation, but no revegetation, please delineate that as well.
- b. Revisions or additions to Exhibits C and F showing what areas, if any, will not be disturbed.
- c. Clarification whether all 194.2 acres are intended to be considered affected area for the purpose of reclamation liability. If this is not the case, the affected area boundary needs to be delineated on Exhibits C and F. Please be reminded affected area boundary markers are required on the ground for verification during subsequent inspections.

#### **6.4.7 EXHIBIT G – Water Information**

13. Exhibit Omissions. The Response is adequate.

#### **6.4.13 EXHIBIT M – Other Permits and Licenses (Statement Req'd)**

14. County Use Permit. The Response is adequate.

#### **6.4.19 EXHIBIT S – Permanent Man-made Structures**

15. Structure Omissions. The Response requires additional clarification. The cover letter states “water tanks and sizes are provided on Exhibit C.” The DRMS could not find sizes for all three tanks (needed for demolition cost estimates). We will assume, based on information provided in the first adequacy response the two white tanks are 12 ft. by 18 ft. and the tan tank is 13 ft. by 24 ft. Please confirm.

- a. Inspection Observed Structures. The Response is adequate.

#### **General Comments**

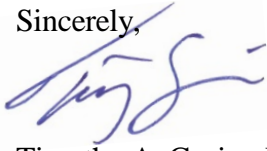
16. Land Owner Notifications. The Response is adequate.

17. Additional Changes to Application. As a reminder, pursuant to Notice Requirement No. 6 (page ii of the Application Form) “Any changes or additions made to an application submittal **MUST** be filed with the county clerk or recorder. You **MUST** also provide the Office with an affidavit or receipt demonstrating that the change was filed with the county clerk or recorder no later than the close of business on the day the change was filed with the Office (Rule 1.8.1(2))”. Please provide a receipt or other proof of placement with the Fremont County Clerk & Recorder for your response sent to this letter.

**Please remember that the decision date for this application is October 30, 2020.** As previously mentioned if you are unable to provide satisfactory responses to any inadequacies prior to this date, it will be your responsibility to request an extension of time to allow for continued review of this application. If there are still unresolved issues when the decision date arrives and no extension has been requested, the application may be denied.

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 x8169 or 303-328-5229 (mobile), or by email at [tim.cazier@state.co.us](mailto:tim.cazier@state.co.us).

Sincerely,

A handwritten signature in blue ink, appearing to read 'Tim Cazier', is written over a light blue rectangular background.

Timothy A. Cazier, P.E.  
Environmental Protection Specialist

ec: Michael Cunningham, DRMS  
DRMS file  
Julio Villon, Holcim  
Angela Bellantoni, PhD, EAI