




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: Baseline Resource	MINE/PROSPECTING ID#: M-1997-058	MINERAL: Sand and gravel	COUNTY: Weld
INSPECTION TYPE: Monitoring	INSPECTOR(S): Eric Scott	INSP. DATE: November 16, 2020	INSP. TIME: 09:45
OPERATOR: Hall-Irwin Aggregates, LLC	OPERATOR REPRESENTATIVE: Ed Lafferty	TYPE OF OPERATION: 112c - Construction Regular Operation	

REASON FOR INSPECTION: Citizen Complaint	BOND CALCULATION TYPE: None	BOND AMOUNT: \$711,750.00
DATE OF COMPLAINT: NA	POST INSP. CONTACTS: None	JOINT INSP. AGENCY: None
WEATHER: Clear	INSPECTOR'S SIGNATURE: 	SIGNATURE DATE: November 17, 2020

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.

INSPECTION TOPIC: Excessive Erosion

PROBLEM/POSSIBLE VIOLATION: Problem: Erosion gullies and ruts were observed on-site on the inner slopes of the lined reservoirs as shown in the attached photos. This is a problem at this time for failure to protect the affected land from erosion pursuant to C.R.S. 34-32.5-116 (4) (j).

CORRECTIVE ACTIONS: The operator shall provide photo documentation to the Division verifying erosion gullies and ruts have been repaired by the corrective action date.

CORRECTIVE ACTION DUE DATE: 12/18/20

INSPECTION TOPIC: Permit Markers

PROBLEM/POSSIBLE VIOLATION: Problem: The affected area boundary markers appear to be incorrectly placed at the north end of the ski lake area. This is a problem for failure to maintain boundary markers around the affected area as required by Section 3.1.12(2) of the rule.

CORRECTIVE ACTIONS: The operator shall conduct a survey to verify and replace the boundary markers in the correct location(s). The operator shall provide proof to the Division that this has been done by the corrective action date.

CORRECTIVE ACTION DUE DATE: 12/18/20

INSPECTION TOPIC: Reclamation Success

PROBLEM/POSSIBLE VIOLATION: Problem: Current reclamation plan needs to be updated and clarified pursuant to C.R.S. 34-32.5-116 (1). The operator must follow approved reclamation plan or provide sufficient information to describe or identify how the operator intends to conduct reclamation.

CORRECTIVE ACTIONS: The operator shall submit a Technical Revision, with the required \$216 revision fee, to update and clarify the current approved reclamation plan to reflect existing and proposed activities by the corrective action date.

CORRECTIVE ACTION DUE DATE: 2/28/21

OBSERVATIONS

This was a monitoring inspection conducted by DRMS at the Hall Irwin Baseline Resource site. This site is located near the intersection of WCR 2 (Baseline Road) and WCR23 immediately northwest of Brighton in Weld County. There are 209.6 acres currently permitted at this 112c site. The inspection was conducted by Eric Scott of DRMS. The DRMS representative met with permittee representatives Ed Laffertry of Hall-Irwin, and Hall-Irwin consultant Steve O'Brian at the site entrance at approximately 09:45. DRMS noted that the site identification signs were present for both Baseline and adjacent permit Parker-Dersham (M2006-003) near the entrance to the property off of WCR 2 (Photo 1).

The inspection was triggered by a citizen complaint received by DRMS on October 27, 2020 via the on-line compliant form. The complaint alleged issues related to: groundwater/well impacts, illegal mining, fish/wildlife impacts, mine plan compliance, reclamation plan compliance, revegetation, signs and markers, dust, overburden/waste, backfilling and grading, erosion/sedimentation, roads, topsoil, and weeds. DRMS contacted the complainant prior to the inspection to try to get a better understanding of the issues listed.

Mining activity ended at this site several years ago, and the majority of the remaining work to be done consists of cleaning up the reservoir areas above water line (removal of excess overburden, surface grading, and replacing topsoil stockpiles) and establishing the appropriate reclamation vegetation. The lined reservoirs have been approved by the SEO office. DRMS concludes that the current bond should be sufficient to complete the required reclamation. Hall-Irwin recently replaced the site boundary markers so that DRMS could verify compliance with the approved permit boundary, and DRMS also noted that the site had been recently mowed.

DRMS was unable to substantiate most of the issues noted in the complaint form submitted, however, several items were noted as problems during the inspection that will need to be addressed by the permittee. These issues are listed below and at the beginning of this report.

- 1) Erosion gullies in the reclaimed slopes of the lined reservoirs will need to be repaired (photo 2)
- 2) Vegetation at the site at this time, although recently mowed, appears to be in generally poor condition and consists mainly of weeds and noxious species such as cheat-grass and Russian thistle. There are also several Russian olive trees that will need to be removed. The permittee will need to take aggressive action to eliminate noxious species and establish the approved reclamation vegetation.
- 3) There appears to be a minor discrepancy between the permit boundary as marked on the ground, and the permit boundary on the maps provided to DRMS at the north end of the ski lake area. This issue will need to be resolved.
- 4) A technical revision to the reclamation plan will need to be submitted to DRMS to update the reclamation plan as needed to reflect current conditions on site and any proposed changes to the approved reclamation plan.

DRMS will also take this opportunity to remind the permittee that reclamation should be completed within 5 years of the end of mining activity. In an effort to ensure reclamation is completed at this site in a timely fashion, as part of the required technical revision listed above, DRMS is also requiring the permittee to submit a summary of all reclamation activities completed within the last 12 months, as well as a list of the required reclamation tasks yet to be completed, and the proposed timeline for the completion of those tasks.

No other issues were noted during this inspection.

Inspection Contact Address

Ed Lafferty
Hall-Irwin Aggregates, LLC
301 Centennial Drive
Milliken, CO 80543

GENERAL INSPECTION TOPICS

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

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

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

PHOTOGRAPHS

