

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:	MINE/PROSPECTING ID#:	MINERAL:	COUNTY:
Parker-Dersham Resource	M-2006-003	Sand and gravel	Weld
INSPECTION TYPE:	INSPECTOR(S):	INSP. DATE:	INSP. TIME:
Monitoring	Eric Scott	November 16, 2020	10:00
OPERATOR:	OPERATOR REPRESENTATIVE:	TYPE OF OPERATION:	
Hall-Irwin Aggregates, LLC	Ed Lafferty	112c - Construction Regular Operation	

REASON FOR INSPECTION:		BOND CALCULATION TYPE:	BOND AMOUNT:
Normal I&E Program		Partial Bond	\$974,000.00
DATE OF COMPLAINT:		POST INSP. CONTACTS:	JOINT INSP. AGENCY:
NA		None	None
WEATHER:	INSPE	CTOR'S SIGNATURE:	SIGNATURE DATE:
Clear	Ene Aut		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: Trash/refuse

PROBLEM/POSSIBLE VIOLATION: Problem: Trash and refuse was noticed on the site (photo 2). This is a problem at this time for failure to dispose of refuse in a manner that controls unsightliness or deleterious effects of such refuse pursuant to C.R.S. 34-32.5-116(4)(e).

CORRECTIVE ACTIONS: The operator shall submit a written notice to the Division with photo documentation, that the trash has been removed from the site by the corrective action date.

CORRECTIVE ACTION DUE DATE: 12/18/20

OBSERVATIONS

This was a monitoring inspection conducted by DRMS at the Hall Irwin Parker/Dersham site. This site is located near the intersection of WCR 2 (Baseline Road) and WCR23 immediately northwest of Brighton in Weld County. There are 52.3 acres currently permitted at this 112c site in two separate areas at the NW and SW corners of the Hall-Irwin Baseline site. The inspection was conducted by Eric Scott of DRMS. The DRMS representative met with permittee representative Ed Laffertry of Hall-Irwin, and Hall-Irwin consultant Steve O'Brian at the site entrance at approximately 10:00. DRMS noted that the site identification signs were present for both Baseline (M1997-058) and adjacent permit Parker-Dersham (M2006-003) near the entrance to the property off of WCR 2 (Photo 1).

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 area above water line, removal of excess overburden from the northern area, surface grading, replacing topsoil stockpiles, and establishing the appropriate reclamation vegetation. The lined reservoir which makes up a portion of the southern area has 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 southern area of the site had been recently mowed.

Several items were noted as problems during the inspection that will need to be addressed by the permittee during reclamation. These issues are listed below and at the beginning of this report.

- 1) Trash was noted on site that will need to be removed and disposed of properly (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. The permittee will need to take aggressive action to eliminate noxious species and establish the approved reclamation vegetation.
- 3) A significant amount of overburden will need to be removed to return the NW portion of the permit area to approximate original grade prior to replacing topsoil and establishing reclamation vegetation.
- 4) A technical revision to the reclamation plan may need to be submitted to DRMS to update the reclamation plan as needed to reflect 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, DRMS is 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

PERMIT #: M-2006-003 INSPECTOR'S INITIALS: ECS INSPECTION DATE: November 16, 2020

PHOTOGRAPHS



Photo 1 – Site identification sign near entrance from WCR 2



Photo 2 – Trash in NW area of site that will need to be removed and disposed of properly.



Photo 3 – Dry lined reservoir area in SW area of site.



Photo 4 – Large stockpile of overburden (shale) in NW area of site that will need to be removed from the site prior to revegetation.



Photo 5 – Additional overburden and concrete that will need to be removed from NW area of permit.

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>NA</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>NA</u>
(MP) GENL MINE PLAN COMPLIANCE- <u>NA</u>	(FW) FISH & WILDLIFE <u>NA</u>	(RV) REVEGETATION <u>NA</u>
(SM) SIGNS AND MARKERS <u>Y</u>	(SP) STORM WATER MGT PLAN <u>NA</u>	(RS) RECL PLAN/COMP <u>NA</u>
(ES) OVERBURDEN/DEV. WASTE <u>Y</u>	(SC) EROSION/SEDIMENTATION <u>NA</u>	(ST) STIPULATIONS <u>NA</u>
(AT) ACID OR TOXIC MATERIALS <u>NA</u>	(OD) OFF-SITE DAMAGE <u>NA</u>	

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