



November 25, 2020

Ms. Debbie Wagner  
High Plains Stone Company  
8084 Blakeland Drive  
Littleton, CO 80125

**RE: South 40 Quarry No. 2; File No. M-2020-051, 110c Application;  
Preliminary Adequacy Review**

Dear Ms. Wagner:

The Division of Reclamation, Mining and Safety (DRMS) has completed its preliminary adequacy review of your 110c Construction Materials Reclamation Permit Application package for the South 40 Quarry No. 2, File No. M-2020-051. The application was received on October 6, 2020 and called complete for review on November 13, 2020 after receiving a response to our October 22, 2020 Incompleteness Notice. The decision date for this application is December 13, 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 Division will deny this application.**

The review consisted of comparing the application content with specific requirements of Rules 3, 6.1, 6.2, 6.3 and 6.5 of the Minerals Rules and Regulations of the Colorado Mined Land Reclamation Board for the Extraction of Construction Materials (Rule). Any inadequacies are identified under the respective exhibit heading along with suggested actions to correct them.

**APPLICATION**

1. Item 14, p. 4 – This item addressing acidic or toxic-forming materials being exposed or disturbed was left blank. Please confirm no acidic or toxic-forming materials will be, or have been exposed or disturbed as part of this operation.

**6.3.1 EXHIBIT A - Legal Description**

2. Location – The provided description states the site is in the NE & NW  $\frac{1}{4}$  of Section 14 T17S, R68W. This is the location of the South 40 Quarry (M-1990-016). This new reclamation only permit location is in the NE & NW  $\frac{1}{4}$  of the SW  $\frac{1}{4}$  of Section 14, T17S, R68W, 6<sup>th</sup> Principle Meridian. Also, pursuant to Rule 6.3.1(2), the coordinates of the mine



entrance location are to be provided in exhibit A. Please resubmit Exhibit A with the following:

- a. Location described as “NE & NW  $\frac{1}{4}$  of the SW  $\frac{1}{4}$  of Section 14, T17S, R68W, 6<sup>th</sup> Principle Meridian”,
- b. Entrance location: 38.57045°N; 104.97026°W

#### **6.3.4 EXHIBIT D – Reclamation Plan**

3. References to M-1990-016 – The first paragraph discusses reclamation needed for Parcels 1 and 2 of the existing permit. Reclamation of these areas is covered under the M-1990-016 permit. Please resubmit Exhibit D without reference to reclamation needed for the 1990 permit (including the photos in the Attachment 3) and limit the reclamation plan to the South 40 Quarry No. 2 permit.
4. Topsoil – The third paragraph proposes adding one inch of topsoil to the area to be reclaimed. The DRMS is not aware of a topsoil stockpile in the vicinity. If there is one please provide a volume estimate and a location on the Exhibit D map (labeled Attachment 1 in the application) or provide a new map; and explain what equipment is to be used to haul and spread the topsoil. If there is not an existing topsoil stockpile, the DRMS believes based on site observations that vegetation can be established without adding the small amount of topsoil (see Photo 1). If there is no existing topsoil stockpile, please resubmit Exhibit D removing the topsoil placement and committing to performing tillage operations as recommended in the NRCS seeding plan (labeled Attachment 2 in the application).



*Photo 1. Self-revegetated staging area from previous inspection*

5. Reclamation costs – The last sentence indicates a bond of \$200 per acre should be adequate. No unit costs or other supporting documentation is provided for this number. Based on the seeding plan and the State Land Board's wish to have the access roads (upper, on the west end of the staging area: 38.569933°N; 104.971917°W and lower, at the entrance listed in the Application: 38.570459°N; 104.970266°W), the DRMS has generated a draft cost estimate include as **Attachment A**. This estimate does not include topsoil placement, but may as Task 002, depending on your response to Comment 4 above. Please review this estimate and provide comments as you deem appropriate. If you have no comments or objections, and no topsoil stockpile is present, this will be the bond required by the DRMS.
6. The deadline for public comments is November 28. If the DRMS receives timely comments not expressed in Comments 1 through 5 in this letter and are within our jurisdiction, an additional adequacy letter may be issued.

Please be advised the South 40 Quarry No. 2 110 Application may be deemed inadequate and the application may be denied on **December 13, 2020** unless the abovementioned adequacy review items are addressed to the satisfaction of the DRMS. If you feel more time is needed to complete your reply, the DRMS can grant an extension to the decision date. This will be done upon receipt of a written waiver of your right to a decision by December 13, 2020 and request for additional time. This must be received no later than the deadline date.

If you have any questions, please contact me at (303) 328-5229 [cell #] as I am working remotely.

Sincerely,



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

Enclosure: Draft Reclamation Cost Estimate

ec: Michael Cunningham, DRMS  
DRMS file  
Ben Teschner, SLB

**ATTACHMENT A**  
**COST SUMMARY WORK**

Task description: Cost Summary

Site: South 40 Quarry No. 2

Permit Action: New Permit

Permit/Job#: M2020051

**PROJECT IDENTIFICATION**

Task #: 000

State: Colorado

Abbreviation: None

Date: 11/23/2020

County: Fremont

Filename: M051-000

User: TC1

Agency or organization name: DRMS

**TASK LIST (DIRECT COSTS)**

Task	Description	Form Used	Fleet Size	Task Hours	Cost
001	Place boulders to block access roads (CAT 908H @ \$74.91/Hr)	NA	1	1.00	\$75
003	Reveg 1.67 acres	REVEGE	1	4.00	\$903
004	Mob/Demob equipment	MOBILIZE	1	4.33	\$1,643
<b><u>SUBTOTALS:</u></b>				<b>9.33</b>	<b>\$2,621</b>

**INDIRECT COSTS**

**OVERHEAD AND PROFIT:**

Liability insurance: 2.02  
Performance bond: 1.05  
Job superintendent: 2.50  
Profit: 10.00

Total = \$53  
Total = \$28  
Total = \$174  
Total = \$262

TOTAL O & P = \$516

CONTRACT AMOUNT (direct + O & P) = \$3,137

**LEGAL - ENGINEERING - PROJECT MANAGEMENT:**

Financial warranty processing (legal/related costs): \$0  
Engineering work and/or contract/bid preparation: 4.25  
Reclamation management and/or administration: 5.00

Total = \$0  
Total = \$133  
Total = \$157

CONTINGENCY: 0.00 Total = \$0

TOTAL INDIRECT COST = \$807

**TOTAL BOND AMOUNT (direct + indirect) = \$3,428**

**REVEGETATION WORK**Task description: Reveg 1.67 acresSite: South 40 Quarry No. 2Permit Action: New PermitPermit/Job#: M2020051**PROJECT IDENTIFICATION**Task #: 003State: ColoradoAbbreviation: NoneDate: 11/23/2020County: FremontFilename: M051-003User: TC1Agency or organization name: DRMS**FERTILIZING****Materials**

Description	Units / Acre	Unit	Cost / Unit	Cost /Acre
			\$	\$
			<b>Total Fertilizer Materials Cost/Acre</b>	<b>\$0.00</b>

**Application**

Description	Cost /Acre
	\$
<b>Total Fertilizer Application Cost/Acre</b>	<b>\$0.00</b>

**TILLING**

Description	Cost /Acre
Chisel plowing {DMG}	\$94.63
<b>Total Tilling Cost/Acre</b>	<b>\$94.63</b>

**SEEDING**

Seed Mix	Rate – PLS LBS / Acre	Seeds per SQ. FT	Cost /Acre
Blue Grama - Hachita	0.25	4.08	\$3.99
Indian Ricegrass - Nespar	0.74	2.40	\$6.57
Little Bluestem - Pastura	0.67	4.00	\$9.03
Sideoats Grama - Vaughn	1.37	4.50	\$11.47
Triticale	10.00	5.74	\$7.50
Streambank Wheatgrass - Sodar	1.68	5.48	\$9.58
Western Wheatgrass - Arriba	6.40	16.16	\$41.60
<b>Totals Seed Mix</b>	<b>21.11</b>	<b>42.35</b>	<b>\$89.74</b>

**Application**

Description	Cost /Acre
Broadcast seeding [DMG]	\$267.22
<b>Total Seed Application Cost/Acre</b>	<b>\$267.22</b>

**MULCHING and MISCELLANEOUS****Materials**

Description	Units / Acre	Unit	Cost / Unit	Cost /Acre
			\$	\$
<b>Total Mulch Materials Cost/Acre</b>				<b>\$0.00</b>

**Application**

Description	Cost /Acre
	\$
<b>Total Mulch Application Cost/Acre</b>	<b>\$0.00</b>

**NURSERY STOCK PLANTING**

Common Name	No / Acre	Type and Size	Planting Cost	Fertilizer Pellet Cost	Cost /Acre
					\$
<b>Totals Nursery Stock Cost / Acre</b>					<b>\$0.00</b>

**JOB TIME AND COST**

No. of Acres:	<u>1.67</u>	Cost /Acre:	<u>\$451.59</u>
Estimated Failure Rate:	<u>25%</u>	Cost /Acre*:	<u>\$356.96</u>
*Selected Replanting Work Items:	<u>SEEDING</u>		

Initial Job Cost:	<u><b>\$754.16</b></u>
Reseeding Job Cost:	<u><b>\$149.03</b></u>
Total Job Cost:	<u><b>\$903</b></u>
Job Hours:	<u><b>4.00</b></u>

**EQUIPMENT MOBILIZATION/DEMOBILIZATION**Task description: **Mob/Demob equipment**Site: **South 40 Quarry No. 2**Permit Action: New PermitPermit/Job#: M2020051**PROJECT IDENTIFICATION**Task #: 004State: ColoradoAbbreviation: NoneDate: 11/24/2020County: FremontFilename: M051-004User: TC1Agency or organization name: DRMS**EQUIPMENT TRANSPORT RIG COST**Shift basis: 1 per dayCost Data Source: CRG DataTruck Tractor Description: GENERIC ON-HIGHWAY TRUCK TRACTOR, 6X4, DIESEL POWERED,  
400 HP (2ND HALF, 2006)Truck Trailer Description: GENERIC FOLDING GOOSENECK, DROP DECK EQUIPMENT  
TRAILER (25T, 50T, AND 100T)**Cost Breakdown:**

<b>Available Rig Capacities</b>	<b>0-25 Tons</b>	<b>26-50 Tons</b>	<b>51+ Tons</b>
Ownership Cost/Hour:	\$17.20	\$29.63	\$38.69
Operating Cost/Hour:	\$26.56	\$47.02	\$55.69
Operator Cost/Hour:	\$23.63	\$23.63	\$23.63
Helper Cost/Hour:	\$0.00	\$23.53	\$23.53
Total Unit Cost/Hour:	\$67.39	\$123.81	\$141.54

**NON ROADABLE EQUIPMENT:**

Machine Description	Weight/ Unit (TONS)	Owner ship Cost/hr/ unit	Haul Rig Cost/hr/unit	Fleet Size	Haul Trip Cost/hr/ fleet	Return Trip Cost/hr/ fleet	DOT Permit Cost/ fleet
CAT 908H	7.12	\$15.30	\$67.39	1	\$82.69	\$67.39	\$250.00
Drill/Broadcast Seeder with Tractor	25.00	\$6.72	\$67.39	1	\$74.11	\$67.39	\$250.00

Subtotals: **\$156.80** **\$134.78** **\$500.00****ROADABLE EQUIPMENT:**

Machine Description	Total Cost/hr/ unit	Fleet Size	Haul Trip Cost/hr/ fleet	Return Trip Cost/hr/ fleet
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Subtotals: **\$0.00** **\$0.00**

**EQUIPMENT HAUL DISTANCE and Time**

Nearest Major City or Town within project area region:	<u>COLORADO SPRINGS</u>	
Total one-way travel distance:	<u>25.00</u>	miles
Average Travel Speed:	<u>30.00</u>	mph

Total Non-Roadable Mob/Demob Cost *	<u>\$1,642.77</u>
** two round trips with haul rig:	
Total Roadable Mob/Demob Cost **	<u>\$0.00</u>
** one round trip, no haul rig:	

**Transportation Cycle Time:**

	Non-Roadable Equipment	Roadable Equipment
Haul Time (Hours):	<u>0.83</u>	<u>0.83</u>
Return Time (Hours):	<u>0.83</u>	<u>0.83</u>
Loading Time (Hours):	<u>0.25</u>	<u>NA</u>
Unloading Time (Hours):	<u>0.25</u>	<u>NA</u>
Subtotals:	<u>2.17</u>	<u>1.67</u>

**JOB TIME AND COST**

Total job time:	<u>4.33</u>	Hours
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Total job cost:	<u>\$1,643</u>
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