



Minerals Plan of Operations Inspection
U.S. Department of the Interior
Bureau of Land Management
Royal Gorge Field Office



The BLM has conducted an inspection of your operations, which concludes whether the documented operations on file with BLM are compliant or noncompliant. Any non-compliance issues are reported in the Additional Actions Necessary section of this inspection.

Operation Type: ☒ 3809 w/ occupancy ☐ 3809 w/o occupancy

Date: Jul 22, 2020 Time: 12:35 pm Weather: Sunny	Operation Name: Field of Dreams Mine Operator: Gold Tamers LLC Case Number: COC73930 CDRMS Number: M-2009-056
<u>Attendees</u> BLM: S. Carter & A. Sanderson Operator(s): J. Widdison & M. Donnelly Other(s): None	<u>General</u> Operation(s) are in-compliance with documentation on file <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A Operation(s) and disturbance onsite coincide with the operations and access on file <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A

Inspection Purpose: ☐ Pre-Operations ☒ General ☐ Final ☒ Compliance ☐ Trespass ☐ Complaint

Inspection Items	Compliant	Non-Compliant	N/A
1. Method of Operations			
Drilling, Trenching/Surface Excavation & Underground Excavation			
a. Drilling	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i. Pad Construction	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii. Drill/Drilling Equipment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii. Mud Pits	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv. Borehole Abandonment/Monitoring Well Conversion	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> Complete <input type="checkbox"/> Incomplete	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
v. Pad Reclamation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Trenching/Surface Excavation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i. Trench/Excavation Construction	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii. Trench/Excavation Stability	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii. Excavation/Reclamation Equipment	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Trench/Excavation Reclamation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Underground Excavation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i. Portal Construction	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii. Portal Stability	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii. Blasting Operations <input type="checkbox"/> Internal <input type="checkbox"/> External	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv. Excavation/Reclamation Equipment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
v. Portal Reclamation/Conversion of Entry	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Inspection Items	Compliant	Non-Compliant	N/A
2. Site Conditions			
a. Material/Waste Rock Management	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Erosion & Stormwater Control	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Man-made Structures	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Weed Management	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Safety Conditions	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Interim Reclamation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Interim Management Plan	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Housekeeping			
a. Container Management	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Spills/Leaks Observed	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Hazardous Substances/POL Management	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. General Housekeeping	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. Access			
a. Road Management	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Berms	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Security	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Signage	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Surface Water Controls	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Quality Assurance/Quality Control			
a. Routine Site Conditions Monitoring	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Air, Water, Noise, Other Monitoring	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Monitoring Reporting	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Regulatory Submittals	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Other Agency/Entity Permits	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6. Final Reclamation			
a. Exploration/Sampling Location	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Access Roads/Trails	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Grading	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Revegetation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Removal of Structures	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Free of Trash	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. RGFO Solid Minerals Reclamation Standards met	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. Occupancy & Use – under the Mining Law (3715 regs)			
a. Occupancy Concurrence on File	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Occupancy Remains Reasonably Incident	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Substantially Regular Work	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Mining Equipment is Mobile	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Other Equipment/Materials Used for the Maintenance, Repair or Fabrication of Parts	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Occupancy Related Structures & Signage	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Additional Actions Necessary

Non-Compliance Issues to be addressed by Operator

Questions to be Addressed by the Operator

1.b.iii. Excavation/Reclamation Equipment

- In the 2019 MD-2 Plan of Operations minor modification, changes were made to the processing facility/wash plant; however, the mining equipment types remained the same. The current mining equipment onsite does not correlate with the Plan of file with BLM (e.g. size and type). The operator could either file another minor modification or provide the mining equipment updates in the additional information still needed to complete the MD-1 major modification (MD-1 has yet to be authorized as BLM is still awaiting additional information requested on 05/02/2019).
 - What plan does the operator have to meet compliance? Please provide BLM with either a minor mod or the additional information needed to continue processing the MD-1 modification.

2.b. Erosion and Stormwater Control

- No stormwater controls are currently in place at the site. This needs to be done in accordance with the applicable stormwater management plan and State of CO required permit. It's not clear the status of these items at this time. The operator stated this is in progress, however a timeframe was not indicated to BLM.
 - What plan does the operator have to comply with federal and state regulations regarding stormwater management?

3.a-d. House Keeping

- Diesel and oil containers are not properly stored on-site. Multiple open spent oil and diesel containers were stored behind the maintenance truck located along the SE boundary. All POL substances need to be stored in appropriately labeled containers and within secondary containment vessels. Several small oil spills were also observed throughout the site. Best Management Practices suggest storing all POLs away from water resources and within secondary containment. Note: No sheen was observed on water surfaces. *All POLs will need to be removed off-site prior to the seasonal shut-down.

5.d. Quality Assurance/Quality Control – Regulatory Submittals

No documentation has been received yet.

- The operator has been monitoring the site regularly for safety hazards and maintenance (frequency is daily logs when the site is active and weekly during nonoperational periods).
 - The operator will need to email BLM the monitoring logs as evidence of this monitoring process.
- An interim management plan is required during non-operational seasons. At this time, BLM has not received a plan.
 - Does the operator have an interim management plan during the non-operational season?

5.e. Quality Assurance/Quality Control – Other Agency/Entity Permits

The majority of permits are in place; however, follow-up is still needed on the following:

- Stormwater permit with State of Colorado - associated stormwater management plan, which will

address 2.b. **This permit is in progress with the State of Colorado, CDPHE.**

BLM explained that a PERMIT AND SWMP IS REQUIRED before operations restart in the spring.

- **What is the progress on obtaining a Stormwater permit and SWMP?**
- An annual air pollution permit (APEN) update with the State of Colorado is required.
 - **Has the operator obtained these annual updates to the APEN?**

Final Notes

General Comments:

I. Non-compliance items #1-10 that were included with the 07/05/18 BLM non-compliance order and still remain somewhat in non-compliance as of 07/22/20.

#7 Operator stated the pond liner would be either re-salvaged and stored in a general location or removed from the site NLT 11/29/18. As of 07/22/20 inspection, the pond liner remains onsite and stored in various locations: along the western and northern boundaries and the SE material storage area (ref. 03/25/2020; images 48-50). The operator is planning to sell the liner following the first spring thaw. The pond liner is no longer outside the authorized boundary.

#10 To date, no monitoring/reporting has been submitted to BLM for the non-operational period. The operator, Matt Donnelly is planning to email the monitoring logs. Now that operations are active, the requirements for interim management have ceased; however, an interim management plan still needs to be filed with BLM.

THE ABOVE NON-COMPLIANCE ITEMS REQUIRE IMMEDIATE ACTION ON THE PART OF THE OPERATOR. REFERENCE THE PREVIOUS INSPECTIONS AND NON-COMPLIANCE ORDER FOR DETAILS REGARDING ALL NON-COMPLIANCE ITEMS.

II. Items below are not categorized as non-compliant, however need to be addressed by the operator:

1. Routine inspections and monitoring logs are required during both operational and non-operational season. Ref. 5.a-c. above. Please provide BLM with a copy of all current logs.
2. Aggregate materials are sorted (no crushing) on-site from the ore materials and sold under a BLM mineral material contract. Product commodities consist of sand sized material while other larger overburden waste materials are stored along the western boundary; for later use in reclamation (ref. the 3600 mineral material inspection 07/22/20).
3. A weed management plan is required to meet compliance with BLM. **The operator was informed that county or state regulations can be used to develop a control plan for the treatment of invasive plants.**
4. The operator informed BLM that several previous mine employees were living in other campers onsite. The occupancy concurrence has only 1 watchman camper/office onsite. **If other similar type occupancy structures will be needed during active operations, then the operator will need to modify the occupancy on file.**

5. The mine boundary fence has been installed; however, the western boundary has been illegally cut by unknown trespassers (ref. image 21). The operator was informed to reinstall the fence and post multiple signs along the fence to further inform the public of the mining operation and safety hazards.
6. Equipment on-site (ref. Map below for site locations): A minor modification was approved to change the design of the wash plant; however, other equipment not authorized in the current Plan of Operations will need to be modified by the operator and authorized by BLM. **Dependent if this modification is minor or major, a NEPA analysis might be required. The operator requested a modification to the Plan of Operations last year; however, BLM is waiting on additional information to finish processing the modification.**
 - The equipment/structures on-site are the following:
 - Wash plant with conveyor system and hopper (3 conveyor belts)
 - 2 small diesel generators
 - 1 large diesel generator (inactive)
 - 2 large diesel generators (active)
 - Watchman office/camper
 - Shipping container for storage (8 x 8.5 x 20 feet; w x h x l)
 - 2 water pumps (red water pump is sold which will be removed from the site within the next week)
 - Port-a-potty
 - Screw plant
 - Pond liner
 - Service/Maintenance truck
 - 3R dumpster
 - Miscellaneous mining related materials
 - Skid loader
 - 2 small motorized karts and 4 person UTV
 - POL container storage area
 - Front-end wheel loader
 - Trackhoe excavator
 - Perimeter fence

*Reference the Mining Plan, 6.3.3 Exhibit C, Section E of the Construction Material Permit for the types of equipment currently authorized on-site.

7. In the future, the operator needs to check the Plan of Operations for the visual and noise barrier requirements (per the height, berm material, reseeding, aspen trees and amended material resource, etc.) to verify all adequate mitigation measures are followed per the NEPA Environmental Assessment.
8. Reference the 03/25/2020 inspection for details regarding the perimeter berms, fence boundary, material storage, storage container, pond liner locations and other equipment types not documented in this inspection.

Date inspection shared with CDRMS:

Date inspection shared with Operator:

Images

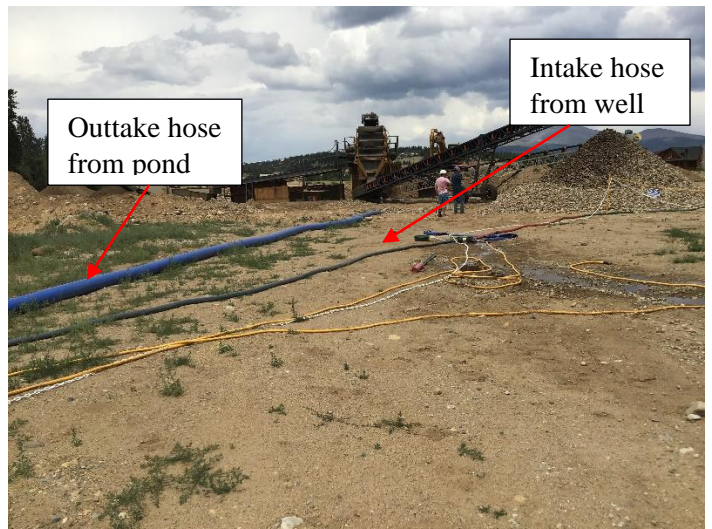
Image(s): 1-3 (Images taken by A. Sanderson, 07/22/20)



Comment: Current disturbance located along the northern storage area. The operator is currently processing material which was mined last operational season.

Image(s): 4-11 (Images taken by A. Sanderson, 07/22/20)





Comment: A water circulation pond with a diesel-powered water pump is used to process the ore and sand and gravel materials. The water is sourced from an authorized onsite well (sourced from S. Platte River; SPRAP authorization/use balance) and is pumped from the circulation pond lined with an impermeable clay layer (image 4-7). A noise control system is utilized to mitigate the total accumulated machinery noise (image 9). No oil sheen was visible on the water surfaces and a life preserver was available near the pump as a safety

precaution (image 8). Wildflowers were observed along the southern bermed edges of the pond which was evidence of adequate growing conditions.

Image(s): 12-13 (Images taken by A. Sanderson, 07/22/20)



Comment: Waste disposal – 1) Port-a-Potty located near the watchman's office/camper and was staked to secure the structure to the ground and 2) 3R Dumpster located near the conveyor belts and material storage.

Image(s): 14-18 (Images taken by A. Sanderson, 07/22/20)





Comment: Variety of generators used as the main power source for the processing facility, air compressor and other powered equipment. Inactive generator (image 14), 2 small generators (image 15) and large generators as the main power source (images 16-17).

Image(s): 19-24 (Images taken by A. Sanderson, 07/22/20)





Comment: POL storage and secondary containment. The spent oil located behind the maintenance truck needs to be properly stored and disposed of once no longer in-use. Any POL spills need to be cleaned and disposed of according to the spill contingency plan (ref. map below for oil spill locations).

Image(s): 25 (Images taken by A. Sanderson, 07/22/20)



Comment: The 3 rung straight wire perimeter fence is completely constructed; however, approximately 15 feet of the western fence has been cut by an unknown trespasser or public land user (ref. red arrow).

Image(s): 26 (Images taken by A. Sanderson, 07/22/20)



Comment: New wash/processing plant authorized in the Plan of Operations minor modification on 08/15/19. The plant was active during the operations, sorting ore from inert mineral materials. Material is sorted by 3

sizes: medium grained sand (0.25-0.55 mm), roadbase ¾-, pebbles (2-4 mm) and cobble and boulders (ref. 07/22/20 3600 mineral material inspection for details regarding mineral material products).

Image(s): 27-30 (Images taken by A. Sanderson, 07/22/20)



Comment: Transportation vehicles onsite include 2 small go-karts and a 4-person UTV. A parking area is located along the southern portion of the site and along the access road.

Image(s): 31-32 (Images taken by A. Sanderson, 07/22/20)



Comment: Mining equipment onsite. Reference the 03/25/2020 map for locations of all other structures onsite.

Image(s): 33-34 (Images taken by A. Sanderson, 07/22/20)



Comment: Safety equipment/measures taken at the site – 1) chain separates the parking area from the processing area, 2) fire extinguishers and 3) life preserver (image 7).

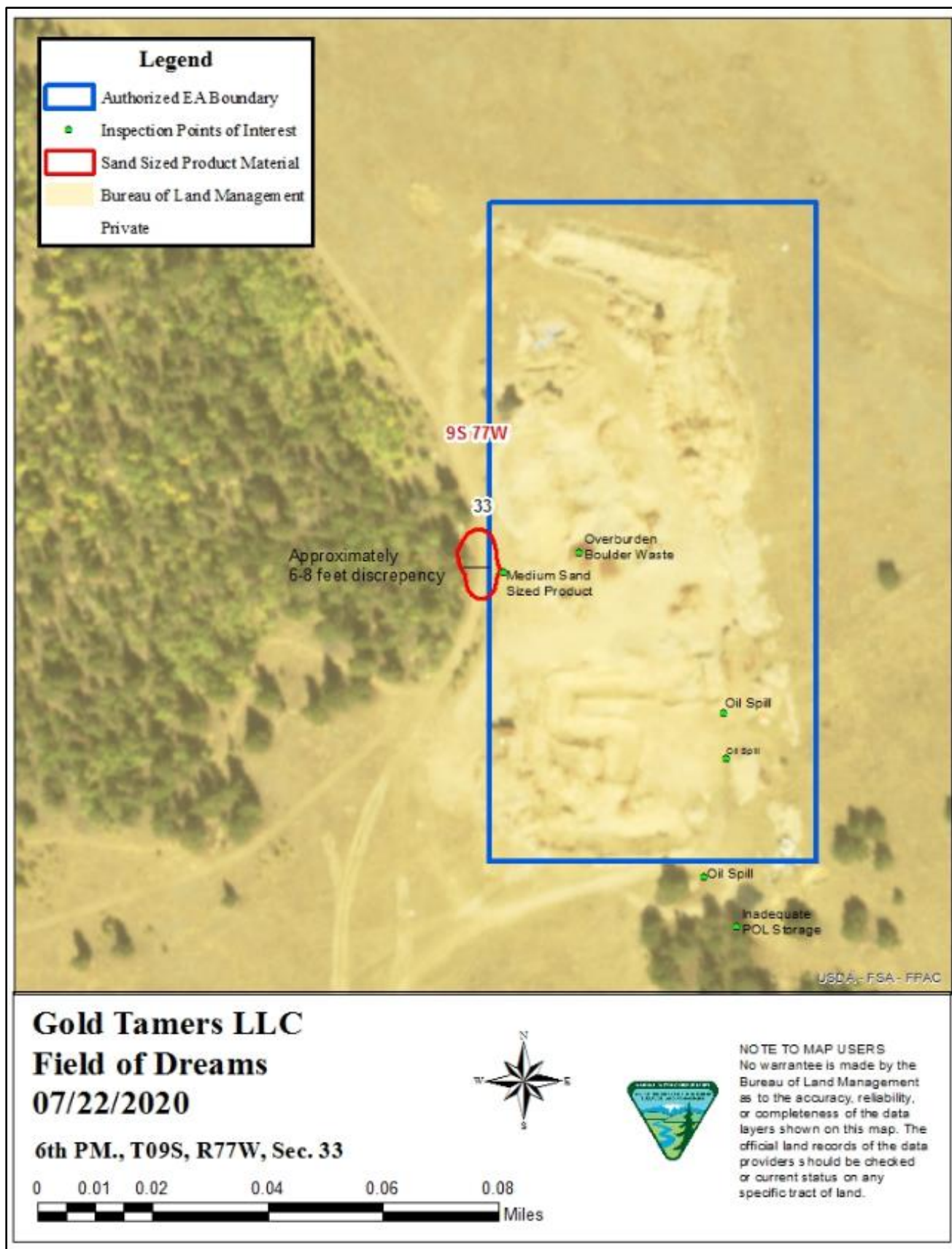


Figure 1: Map of the oil spill and product material locations. The collector app that was used to collect the GPS data has an error of approximately 16 feet; therefore, the product material is most likely within the authorized boundary. (Map created by A. Sanderson, 07/22/20)



Gold Tamers LLC - Field of Dreams noncompliance inspection 01/15/21

Sanderson, Amber M <asanderson@blm.gov>
To: "Russell - DNR, Elliott" <elliott.russell@state.co.us>

Tue, Jan 5, 2021 at 11:18 AM

Hi Elliott,

Attached are the most recent Gold Tamers LLC (Field of Dreams Mine) BLM inspections. Both inspections document several noncompliance items. There have been ongoing issues at this site, even following the issuance of a noncompliance letter back in June 2018.

I'm conducting a follow-up inspection on 01/15/21 with the operator to determine if the noncompliance issues have been addressed. If you would like to accompany me, please let me know. If not, I'll keep you posted on the status of this site.

Happy New Year!

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Amber Sanderson
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2 attachments



110620 Gold Tamers 3809 Inspection.pdf
9807K



072220 Gold Tamers 3809 Inspection.pdf
4197K