



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: Nov 6, 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: A. Sanderson & J. Elkington (Images taken by J. Elkington) Operator(s): Contacted, but not present 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i. Trench/Excavation Construction	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Trench/Excavation Stability	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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.i.-1.b.ii. Excavation/Reclamation Construction & Stability

- The active excavation pit contains a 1:1 slope along the northern and southern edges (ref. images 5-8). To decrease potential safety issues, these slopes will need to be reduced to an active slope of 2:1 per the approved Plan of Operations. Per the Interim Management Plan, all steep slopes will be pulled down prior to seasonal shutdowns.

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 on 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.a. Site Conditions - Material/Waste Rock Management

- No topsoil is currently excavated or stored onsite for later use in reclamation per the Plan of Operations on file. This is also a requirement per the NEPA EA and CDRMS permit. Topsoil will need to be stripped and stored to meet final reclamation requirements.

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 (ref. images 17-26; 37-48 & 52-56)

- 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 and starter fluid cans located near the 3R dumpster. All POL substances need to be stored in appropriately labeled containers and within secondary containment vessels. Several large 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 emptied and stored in adequate secondary containment or in the storage container prior to the seasonal shut-down***
- Trash is littered throughout the site
- Multiple blue, white and metal 55-gallon bung-hole drums are stored in the SE storage area. These drums are not correctly labeled and contain an unknown red fluid. All containers must be stored and adequately labeled according to OSHA or MSHA regulations.
- Rubber sound proofing scattered across the SE boundary near the storage area

- Batteries located next to the gold processing area and along the northern end of the office
- 5 propane bottles stored at the northern end of the office. These bottles need to be stored in the appropriate locations

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:

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. images 27-31). 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 06/28/2018 NON-COMPLIANCE ORDER FOR DETAILS REGARDING ALL NON-COMPLIANCE ITEMS.

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 from the previous operation season.
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 medium sand sized material and roadbase while other larger overburden waste materials are stored along the western & eastern boundaries for later use as backfill during reclamation (ref. images 72-75).
3. A new POL storage area containing 2 Aboveground Storage Tanks (ASTs) with secondary containment (black pond liner with roadbase) have been installed along the central eastern boundary (ref images 49-51). These diesel storage tanks provide fuel for heavy equipment onsite. **Does the operator still have plans to utilize small portable plastic cans and if so, these cans will need to be stored properly in secondary containment to prevent spills/leaks.**
4. 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.**
5. The mine boundary fence has been installed; however, in the previous inspection, BLM documented that the western boundary had been illegally cut by unknown trespassers (ref. 07/22/2020 inspection). **The operator has constructed a 20-foot berm along the NW/W boundary with overburden material (ref. images 57-59).**
6. A gold processing area has been installed near the office/camper storage and parking areas. This area consisted of multiple types of equipment: gold pans, gold cube, sluice, battery, containment area and concentrates.
7. 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.

8. 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.
9. Requirements per the Interim Management Plan and NEPA EA during winter shutdown (end of November to end of April) and non-operation seasons:
 - Inspection once a week or every 2 weeks
 - Rake sides of pit down to safe slopes
 - Fence will be put across the pit to keep out trespassers with visible no trespassing signs and a sign posted at the entrance with the operator information, sheriff's number, and local govt office numbers
 - Winterize topsoil
 - Fuel tanks emptied and all POLs will be stored in a shed located in the storage area of the property
 - Use water for dust control
 - Submit monitoring logs to BLM
 - Removal of trash
 - All mobile equipment will be stored off property
 - Conveyor belts removed from conveyors
 - Notify CDRMS and BLM 2 weeks prior to closure and start up
10. 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): 1-4



Comment: Adequate mine entrance, access road, signage, fencing and parking area.

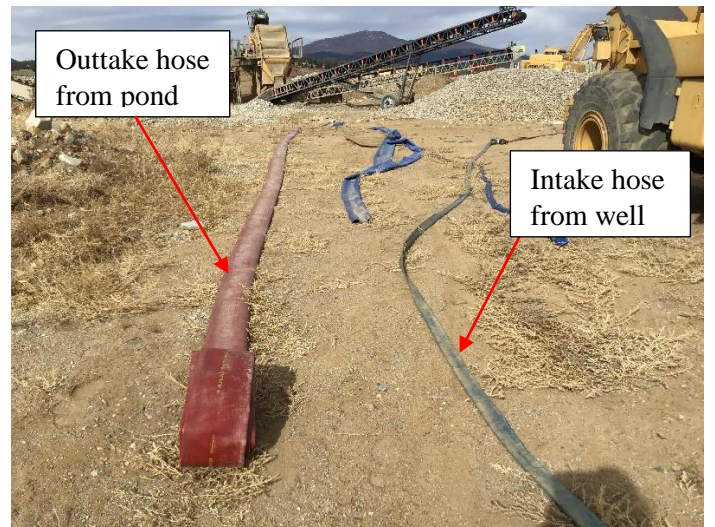
Image(s): 5-8



Comment: Current disturbance located along the northern storage area. The operator has processed the material which was mined last operational season and is now excavating material from a pit along the northern boundary.

Image(s): 9-16





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. A noise control system is utilized to mitigate the total accumulated machinery noise. No oil sheen was visible on the water surfaces and a life preserver was available near the pump as a safety precaution.

Abundant Russian thistle vegetation located along the bermed edges of the pond. This is not considered a noxious weed in Colorado; however, it is not desirable and usually occurs in disturbed areas.

Image(s): 17-26





Comment: House Abundant amount of trash littering the site. The site is currently in noncompliance regarding housekeeping.

Image(s): 27-31





Comment: Rubber noise cancelation for the processing plant and pond liner located along the S/SE storage area and surrounding the water well along the eastern boundary.

Image(s): 32-33



Staked Port-A-Potty



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): 34-36



Comment: Variety of generators used as the main power source for the processing facility, air compressor and other powered equipment. Inactive generator, 2 small generators and 1 large generator as the main power source.

Image(s): 37-48





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).

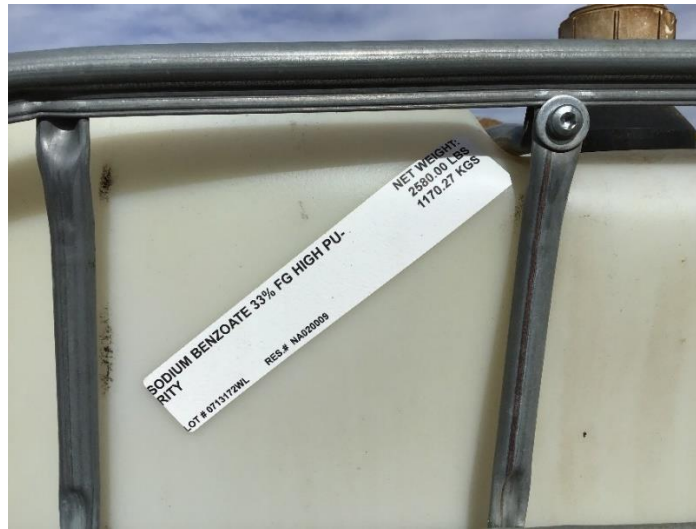
Image(s): 49-51



Comment: New POL storage area containing approximately two 500-gallon gravity flow fuel tank with secondary containment. Multiple oil spills observed outside the secondary containment area. The operator should take the appropriate measure according to the Spill Contingency Plan to clean-up all spills and leaks.

Image(s): 52-56





Comment: Blue, white and metal 55-gallon drums located in the primary storage area along the SE corner boundary. These drums need to be adequately labeled according to OSHA regulations. Other white square containers with a light pink fluid are labeled sodium benzoate and stored in the SE storage area. This chemical is not authorized under the current Plan of Operations. If the fluid is not sodium benzoate, remove the label and relabel the container the type of substance.

Images(s): 57-59





Comment: The 3 rung straight wire perimeter fence is completely constructed; however, approximately 15 feet of the western fence was cut by an unknown trespasser or public land user and documented in the previous inspection (inspection 07/22/20; image). The operator has now constructed a berm consisting of overburden material to keep out trespassers and decrease safety issues.

Image(s): 60-71





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. images below for details regarding mineral material products).

Image(s): 72-75



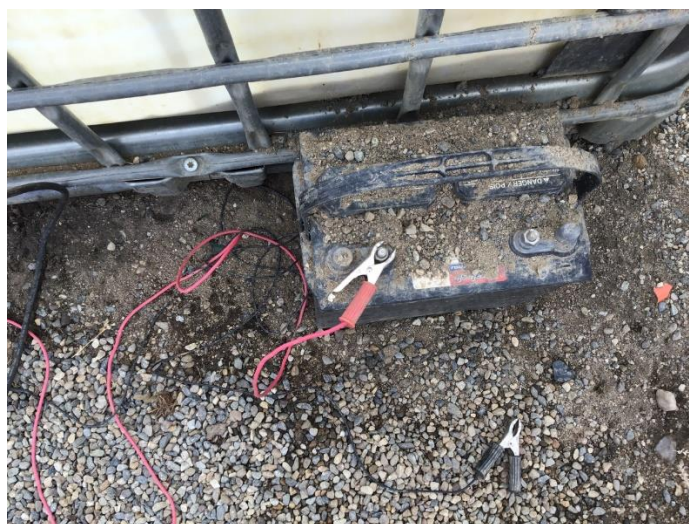
Comment: Mineral materials sold under the current mineral material contract. Reference the map below for locations of the various product and waste stockpiles (e.g. fines, roadbase and overburden)

Image(s): 76-77



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

Image(s): 78-81



Comment: Newly installed gold processing area to separate gold concentrates using a gold pan, sluice and gold cube.



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



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9807K



072220 Gold Tamers 3809 Inspection.pdf
4197K