



**COLORADO**  
**Division of Reclamation,**  
**Mining and Safety**  
Department of Natural Resources

1313 Sherman St. Room 215  
Denver, CO 80203

February 18, 2021

Mr. Ed Lafferty  
Hall-Irwin Corporation  
301 Centennial Drive  
Milliken CO 80543

RE: Extension of Corrective Action Due Date; Baseline Resources; DRMS File M1997-058

Mr. Lafferty,

During an inspection conducted on November 16, 2020 DRMS identified problems related to the marking of the permit boundary, and noted that the currently approved reclamation plan for the site was no longer accurate. DRMS assigned a Corrective Action Due Date of February 28, 2021 for Hall-Irwin to address the deficiencies noted.

Since that inspection, Hall-Irwin has conducted research into the permit files and determined, with DRMS concurrence, that the legal descriptions for the permit area found in the Weld County permit files is the most accurate description of the existing DRMS permit area. Hall Irwin then utilized a professional surveyor to mark the permit boundary as it is described in the legal descriptions, and produce a map of that area.

DRMS noted during this process that there is a minor discrepancy in the mapping of the north end of the "ski lake area" between the permit boundary maps based on the legal description, and the permit boundary maps that have been provided to DRMS historically. Maps provided to DRMS historically depict the ski lake entirely within the permit boundary. However, the maps based on the legal description show approximately 0.5 acre of the north end of the ski lake outside the permit area. The source of this discrepancy/error is unknown. Because the reclamation work in this area has long since been completed, DRMS will not require a permit modification at this time, with the understanding that no further work, other than reclamation vegetation maintenance, takes place in this area.

DRMS further noted during the review of the permit area that the Weld County Assessor's records indicate a portion of the permit area, which includes the north ski lake area discussed above, is now owned by Aggregate Industries. Therefore, Hall-Irwin will need to provide DRMS with an executed right of entry agreement between Hall-Irwin and Aggregate Industries for areas within the Baseline permit now owned by Aggregate Industries.



The updated Reclamation Plan submitted to comply with the outstanding corrective action shall provide at a minimum the following items:

- 1) Updated map and complete legal description of the permit area depicting total permitted acres; and a map showing this permit boundary in relation to existing site features.
- 2) Executed Right of Entry agreement between Hall-Irwin and Aggregate Industries for areas within the Baseline permit now owned by Aggregate Industries.
- 3) Updated reclamation plan and maps detailing all changes from the original 1997 reclamation plan and an updated reclamation plan map showing all proposed final reclamation site features and final site configuration.
- 4) Timetable for completing remaining reclamation work broken down by task/area as soon as practically possible. This timetable will be utilized by DRMS for enforcement purposes to ensure that remaining reclamation is completed in a timely fashion.

DRMS will extend the corrective action date for the submittal of the Technical Revision to update the reclamation plan by 60 days at this time to March 18, 2021. If you have any questions, please contact me at (303) 229-9414, or at Eric.Scott@state.co.us.

Sincerely,



Eric Scott  
Environmental Protection Specialist

CC: Michael Cunningham, DRMS