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

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: Loesch Pit	**MINE/PROSPECTING ID#:** M-1981-068	**MINERAL:** Sand and gravel	**COUNTY:** Garfield
INSPECTION TYPE: Monitoring	**INSPECTOR(S):** Amy Yeldell	**INSP. DATE:** April 15, 2021	**INSP. TIME:** 10:20
OPERATOR: Grant Bros Construction Ltd	**OPERATOR REPRESENTATIVE:** Doug Grant	**TYPE OF OPERATION:** 112c - Construction Regular Operation	
REASON FOR INSPECTION: Normal I&E Program	**BOND CALCULATION TYPE:** Complete Bond	**BOND AMOUNT:** $23,786.00	
DATE OF COMPLAINT: NA	**POST INSP. CONTACTS:** DRMS	**JOINT INSP. AGENCY:** None	
WEATHER: Raining	**INSPECTOR'S SIGNATURE:** Amy Yeldell	**SIGNATURE DATE:** May 4, 2021	

GENERAL INSPECTION TOPICS

The following list identifies the environmental and permit parameters inspected and gives a categorical evaluation of each

(AR) RECORDS---------- Y	**(FN) FINANCIAL WARRANTY-------- Y**	**(RD) ROADS---------- Y**
(HB) HYDROLOGIC BALANCE---------- Y	**(BG) BACKFILL & GRADING---------- Y**	**(EX) EXPLOSIVES--------- NA**
(PW) PROCESSING WASTE/TAILING---- NA	**(SF) PROCESSING FACILITIES------- Y**	**(TS) TOPSOIL---------- Y**
(MP) GENL MINE PLAN COMPLIANCE- Y	**(FW) FISH & WILDLIFE---------- Y**	**(RV) REVEGETATION---- Y**
(SM) SIGNS AND MARKERS---------- Y	**(SP) STORM WATER MGT PLAN---- N**	**(RS) RECL PLAN/COMP-- N**
(ES) OVERBURDEN/DEV. WASTE--------- PB	**(SC) EROSION/SEDIMENTATION--- Y**	**(ST) STIPULATIONS------- Y**
(AT) ACID OR TOXIC MATERIALS------- PB	**(OD) OFF-SITE DAMAGE----------N**	

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

The following inspection topic(s) were identified as having a Problem (PB), which includes correction actions and a deadline whereby the Operator must demonstrate compliance with the conditions of the Permit and the requirements of the Act and Rules. Failure to address the corrective actions by the deadline may cause the Division to escalate the Problem to a Possible Violation (PV) and schedule the issue for formal hearing before the Mined Land Reclamation Board (Board).

INSPECTION TOPIC: Acid And Toxic Materials

PROBLEM: Improper storage and containment of fuels and/or other hazardous materials was present on site.

CORRECTIVE ACTIONS: All storage tanks, petroleum and any hazardous materials on site for any period of time shall have appropriate secondary containment. The site will also have to comply with all applicable SPCC requirements. Please supply photo documentation that any fuel or hazardous materials containers are stored properly - including applicable secondary containment structures by the corrective action date. Note that secondary containment structures shall consist of an impermeable containment which could contain all contents of the tanks and various containers (when full) plus 10% of the total capacity. The operator may also provide photo documentation that all containers have been removed from the site on or before the corrective action date.

CORRECTIVE ACTION DUE DATE: 7/05/21

INSPECTION TOPIC: Excess Spoil & Dev. Waste

PROBLEM: Trash and refuse was noticed on the site, specifically unused steel drums. 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: 7/05/21

OBSERVATIONS

This inspection was conducted as part of the Colorado Division of Reclamation, Mining and Safety normal monitoring program. The Loesch Pit is a 112c sand and gravel pit that consists of a total of 170.06 acres. It is located in Garfield County approximately five miles east of Rifle Colorado and is accessed from CR 346 just north of interstate 70. Doug Grant represented the operator and accompanied Amy Yeldell of the Division on the inspection.

The property is in the process of being sold. Terry Wintermoyer the prospective operator was also present for the inspection. The majority of discussions related to explaining DRMS' processes for transferring permit. Obligations moving forward to comply with the permit and achieve final reclamation was explained. In order to maintain legal Right of Entry (ROE) the permit shall be transferred to the new owner OR a lease agreement provided granting the current operator access.

The mine identification sign and affected area boundary markers are in place and in compliance with Rule 3.1.12. The sign is located at the entrance to the permit boundary

The site was inactive at the time of the inspection. There appears to be very little changes since the previous inspection. Areas to the north and west in phase 4 and 1 are mostly reclaimed. Most recent mining has occurred in the southern portions of phase 2. Phases 5, 6, 3 and the western half of phase 4 all remain undisturbed and are in active agricultural production. Equipment remains on the pit floor as well as several stockpiles of processed material.

All slopes appear to be stable and free of visible erosion. Previously reclaimed slopes appear to be stable with well-established vegetation. Given the timing of the inspection vegetation was not evaluated.

The Division observed several fuel cans sorted outside of secondary containment on the pit floor. Additionally near the scale were several steel barrels (assumed to be empty) were laying on their sides. This is cited as a problem for failing to store hydrocarbons in secondary containment. Additionally this is a problem 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). Please provide the Division with photo documentation that all hydrocarbons are stored in proper secondary containment or that empty containers have been removed from the site by the corrective action date.

Upon final reclamation areas adjacent to the liner (approximately 300 LF) shall be backfilled to a 4H: 1V slope then topsoiled. All other excavated slopes shall be graded to a 3H: 1V or less. Any compacted areas that will be vegetated should be ripped to a depth of 2 ft. prior to topsoil application. Distrubed areas are to be tospoiled to a depth of 10 inches. The current reclamation plan calls for one large pond. Upon final reclamation the operator may need to do a technical revision to ensure that site conditions match the approved reclamation plans. Attached are documents from the permit file to aid in reclamation.

The Division currently holds a financial warranty amount of $23,786 for this site. The bond was last updated in 2017 with SI-1. In an effort to ensure the Financial Warranty adequately, reflects the actual current cost of fulfilling the requirements of the approved reclamation plan the Division will be updating the reclamation cost estimate. A copy of the staff calculations will be sent under separate cover.

Responses to this inspection report should be directed to: Amy Yeldell at the Division of Reclamation, Mining and Safety, 1313 Sherman St., Room 215, Denver, CO 80203. Direct contact can be made by phone at 303-866-3567 Ext 8183 or via email at amy.yeldell@ state.co.us

Inspection Contact Address
Doug Grant
Grant Bros Construction Ltd
P.O. Box 1027
Basalt, CO 81621

Enclosures: Reclamation Plan details

EC: Travis Marshall, Senior EPS, GJFO DRMS

PHOTOGRAPHS

5-9-81

SW EXHIBIT E

RECLAMATION PLAN AND TIMETABLE

Reclamation. The operator proposes the planned future use of the property to be a private recreation area with an improved habitat for wildlife. The affected land will be reclaimed by backfilling the perimeter of the pit to slopes of 3 to 1 and by creating shallow water areas, or by mining and backfilling to create an irregular shoreline, and by revegetation of the area to its natural conditions that will create a desirable habitat for wildlife.

The lake to be created will be approximately 143.61± acres. It will be approximately 4,000 feet long in an east-west direction and will vary in width north to south from 600 feet to 2,100 feet. The shorelines generally will be irregular except in the east and southeast perimeters of the pit. These areas will be relieved by irregularities created by mining or by backfilling so as to present a more natural appearance. Perimeter slopes will be maintained at 3 to 1 or less from five feet above to ten feet below the water level of the lake.

One area of 6 to 1 slopes will be created with a sand beach to facilitate swimming and boating if so desired. The tentative selection of a site for the beach area is along the south side near the west end. Separate areas on other parts of the lake shore will have relatively shallow water to encourage the growth of reeds and rushes and to create a desirable habitat for water fowl. Location of these shallow water areas

is not definite at this time; however, it is expected that three areas along the east and southeast and northwest sides of the lake are the most likely locations. See Map Exhibit F.

As outlined in the Mining Plan, the area will be mined in seven stages. Each stage will last for two to four years, except Stage P which will be in operation during the entire life of the mine. At the conclusion of each mining stage, a reclamation phase will be commenced. Map Exhibits D-1 and F contain complete details and progression of mining stages and reclamation phases.

In salvaging topsoils, reference will be made to the soils map, Exhibit I-1. It is expected that approximately 12 inches of soil will be salvageable. Approximately 8 to 12 inches of topsoil will be redistributed on the areas of the property to be reseeded. The available water capacity at that depth will be approximately one inch and is considered suitable for the species recommended. In the area of the affected land, use of mulches and irrigation often creates very severe weed problems. A depth of 8 to 12 inches of topsoil will eliminate the need for mulching and irrigating but will allow development of adapted species. (See Revegetation Program later in this Exhibit E.)

The operator will attempt to complete final grading, fertilizing and seeding within one year of the completion of each mining stage. Planting and fertilizing will occur between mid-September and late October whenever possible.

If fall planting is impossible and spring planting is an unavoidable necessity, the operator will plant between mid- and late March in each revegetation year. During the balance of the reclamation phase, reclamation progress will be monitored and remedial work will be performed where necessary.

The operator believes that when the site is reclaimed, conditions for many species of wildlife will be improved.

Reclamation Performance Standards. The operator intends to conduct its mining activities in compliance with the Reclamation Performance Standards of Rule 6.

Grading will be performed to create a final topography appropriate to the planned future land use. When backfilling is necessary, the operator will replace overburden and waste materials in the mined area and will insure that the heavy equipment used for this purpose is compacting the earth sufficiently well to achieve good stability. All grading will be done in a manner to control erosion and to protect areas outside the affected land from slides or other damage. All backfilling and grading will be completed as soon as feasible after the mining process. All refuse will be handled and disposed of in a manner that will control unsightliness and protect the drainage system from pollution. There are no acid-forming or toxic materials involved in this operation. There are no drill or auger holes on the land. Maximum slopes will be within the limits set forth in the Rules and Regulations of the Board and will be capable of being traversed by farm machinery.

This operation will be carried out by dewatering the sand and gravel deposit and mining under semi-dry conditions. There will be some local disruption to the prevailing hydrologic conditions during the life of the mine. The operator will comply with applicable Colorado water laws and regulations (as the operator understands them) governing injury to existing water rights in order to minimize any disturbance which might occur to the prevailing hydrologic balance of the affected land and of the surrounding area and to the quality of water in surface and groundwater systems both during and after the mining operation and during reclamation. In addition, the operator expects to comply with applicable federal and Colorado water quality laws and regulations. There are no dredge facilities nor are there any temporary or large siltation structures involved in this operation. There will be no earth dams. See Exhibit G for details concerning water resources.

The mining and reclamation plans take into account the safety and protection of wildlife remaining on the mine site, at the processing sites and along all access roads to the mine site. Wildlife habitat improvement is a specific part of the reclamation plan.

Where it is necessary to remove the topsoil and overburden to reach the mineral deposit, the highest-quality topsoils found on the affected land will be removed in sufficient quantity to implement the reclamation plan. These topsoils

will be segregated and protected. If the topsoil is not replaced on areas to receive revegetation within a short enough time (not to exceed one growing season) to avoid deterioration of the topsoil, vegetative cover or other means will be employed to preserve the topsoil from wind and water erosion, to protect it from any contamination by acid or toxic materials, and to keep it in a useable condition for sustaining vegetation when it is redistributed in accordance with the reclamation plan. Topsoil stockpiles will be maintained to minimize erosion and will be located in areas where disturbances by ongoing mining operations will be at a minimum. The topsoils will be handled as little as possible until they are replaced in disturbed areas. The operator will take measures necessary to insure the stability of the replaced topsoil on graded slopes, spreading it as evenly as possible. Fertilizer and other soil amendments will be used as required in the Reclamation Plan or as the soil tests indicate.

Revegetation. Revegetation will be carried out in such a way as to establish a diverse, effective and long-lasting vegetative cover that is capable of self-regeneration without continued dependence on irrigation, soil amendments or fertilizers. The plan is designed to create a vegetative cover that is at least equal in extent to the cover of the natural vegetation of the surrounding area. The use of species native to the area will be included. Since the intended use of the reclaimed land is a recreation area, the land will be restored

to slopes commensurate with such use. Seed will be drilled wherever possible. Where drilling is not possible, the seed will be broadcast. The revegetation plan provides for the greatest probability of success in plant establishment and vegetative development by considering environmental factors such as seasonal patterns of precipitation, temperatures and wind. Other factors, such as soil texture, fertility, slope stability and the direction in which slopes face, have been considered. A weed control plan is included in the program. Necessary access roads will be constructed through the areas to be planted. The roads will provide access for planting crews and for the supervision and inspection of the reclaimed land.

Revegetation Program. The revegetation program to be implemented by the operator is detailed below. This plan is excerpted from a report prepared by Mark A. Heifner of Oikos Environmental Services and is based on his investigation of soils and vegetation on the site (see Exhibits I and J).

1. Fertilizer. Soils will be tested carefully prior to seeding. Samples will be collected from redeposited topsoil and will be submitted to the soil testing laboratory at Colorado State University. Fertilizers to produce the best growth in the shortest time will be added prior to seeding.

2. Seedbed Preparation. When the soil has been spread and the fertilizer distributed, the surface will be smoothed of large clods and worked until moderately fine where the seed

is to be drilled; the surface will be left fairly rough where it is necessary to broadcast the seed.

3. Seed Mixture. The following mixture will deposit about 31 live seeds per square foot and should be drilled in all areas to be revegetated. The mixture is designed to be drilled at a depth of 1/4 to 1/2 inch; if it is necessary to broadcast the seed, seed rates will be doubled and will be spread on a rough surface and dragged thoroughly after seeding.

Species	Lbs. PLS/Acre
Western Wheatgrass	4
Tall Wheatgrass (Jose variety)	6
Alkali Sacaton	0.5
Fourwing Saltbush	1
Total	11.5

4. Mulch. This mixture does not require a mulch and, in fact, on these soils a mulch could be a distinct deterrent to successful revegetation because the mulching action would keep the soils more moist and somewhat cooler that desirable and would induce excessive salt buildup in the soil surfaces.

5. Irrigation. Irrigation is not considered necessary for establishment of the recommended revegetation.

6. Weed Control. Growth of weeds will be monitored carefully each spring for the first two years after seeding. Severe weed growth will be controlled by mowing. Chemical weed control will be avoided because the chemicals would kill the Fourwing Saltbush.

7. Trees. Native species are expected to invade the affected land. The operator does not intend to plant many

trees; however, some cottonwoods will be planted in a few selected areas to improve final reclamation conditions.

8. Grazing. No horse, cattle and sheep grazing will be permitted during the first two or three years because grazing would damage the young plants.

9. Native Invaders. A number of species can be anticipated to invade the area rather heavily in the first five to seven years. Most will invade along the lake shores. Willow, tamarisk and saltgrass can be expected to invade strongly in the wet and saline areas. Also, cattails and reeds will invade the water areas immediately offshore, thereby providing excellent wildlife habitat and littoral conditions. Sagebrush and rabbitbrush will invade the upland areas where soils are more coarse. Possibly some cottonwood will be found in selected areas, but this is questionable. Box Elder probably will not invade until the vegetation becomes stable and the soils are better developed.

Reclamation Timetable. The reclamation phases listed on the following page may be correlated to Map Exhibits D-1 and F. The phases correspond to the mining stages and are numbered accordingly. Note that these are estimates only and that variations may occur.

RECLAMATION TIMETABLE
LOESCH PIT

Reclamation Phase	Years	Acres ± Total	Water	Road	Revegetation
I	4 - 6	12.18	9.88	0.00	2.30
II	4 - 6	26.68	24.81	0.00	1.87
III	4 - 6	35.80	26.96	0.00	8.84
IV	4 - 6	30.60	28.70	0.00	1.90
V	4 - 6	41.53	37.42	0.00	4.11
VI	1 - 3	17.77	13.18	0.39	4.20
P	3 - 4	5.50	2.66	0.00	2.84
Total Acres ±		170.06	143.61	0.39	26.06

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Environment, Inc.

LARRY E. O'BRIAN
PRESIDENT

9989 WEST 60TH AVENUE
ARVADA, COLORADO 80004
303-423-7297

May 5, 1981

Mr. James B. McArdle, Reclamation Specialist
Mined Land Reclamation
1313 Sherman Street, Room 423
Denver, CO 80203

Dear Jim,

Re Loesch Pit - MLR File No. 81-68

We respond to your letter of May 4 regarding the adequacy of the Loesch Pit application.

A. Exhibit D - Mining Plan
 1. Your comments have been duly noted.

B. Exhibit E - Reclamation Plan
 1. We concur with your recommendations for the planting of cottonwood seedlings along the north side of the property between the lake and the river with spacing at 15 to 20 feet.
 2. Thank you for the information. We will use a variety other than Siouxland cottonwood.
 3. Livestock will be kept out of the area.

C. Exhibit G - Water Resources
 1. No--not according to the hydrologic study in preparation.
 2. Duly noted.

D. Exhibit L - Reclamation Costs
 1. Duly noted.
 2. If I understand your questions, you are suggesting it is possible the operator may slop over onto an adjoining stage with a stockpile or something of that nature.

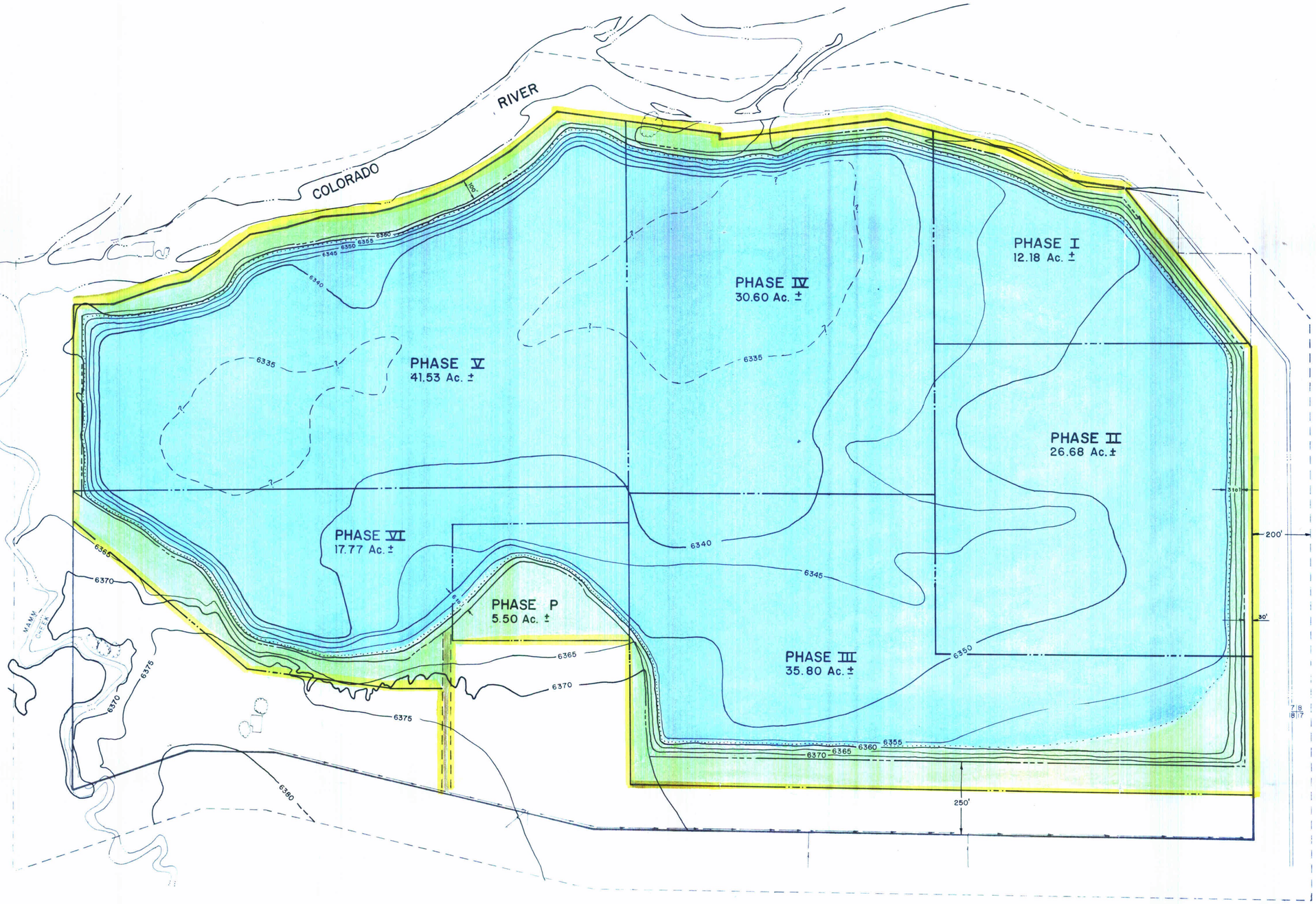
I suggest we cover that eventuality by adding four acres to the area that might be disturbed, placing the additional acreage in the revolving area of the process site. This would increase the bond by $2,932.44. Can we agree that the bond be set at $19,000?

Sincerely,

Larry E. O'Brien

President

LEO:amo
cc: Mobile Premix Company



M-1981-068
Original Application
MAP EXHIBIT F

LEGEND

- AFFECTED LAND
- ROADS
- FENCE
- RIVER
- DITCHES
- CONCRETE DITCH
- 200' LINE
- BUILDINGS
- PHASE LINES
- DIG LINE

I-70 R.O.W. South line

I-70 R.O.W. South line

N

MOBILE PREMIX COMPANY

LOESCH PIT

RECLAMATION PLAN

Part of the NE/4 SE/4, SE/4 SE/4, NE/4 SW/4, NW/4 SW/4, SW/4 SW/4, SE/4 SW/4, NW/4 SE/4, and the SW/4 SE/4, SEC. 7 and Part of the NE/4 NE/4, NW/4 NE/4, and NE/4 NW/4, SEC. 18, T.6S., R.92W., 6th. P.M.

GARFIELD COUNTY, COLORADO

April 1981 1" = 200'

PREPARED BY *ENVIRONMENT, INC*

Larry E. O Brian P.E. No. 7465

DMC
M-1981-068

WATER RESOURCE CONSULTANTS, LLC

Oct. 27, 2010

TO:
Dustin Czapla
Colorado Div. of Reclamation, Mining and Safety
101 S. 3rd Street, Room 301
Grand Junction, CO 81501

RE: Loesch Pit, M-1981-068, Garfield County, CO.
Technical Revision TR-003 – Pit wall liner
Operator: Grant Bros. Const. Ltd.

Dustin,

As discussed last Thursday Oct. 21, 2010, attached is a map showing the aerial extent of pit walls at the Loesch Pit that have been reclaimed as of Oct. 2010 that also includes a liner. The extent of reclamation shown on the enclosed Figure 1A shows the top and bottom of the reclaimed slopes, *not* the actual limits of the liner. The limits of the liner (horizontally) are quite a bit less. The length of pit wall that currently includes a liner is approximately 4,900 lineal feet. The total length of pit wall will depend on the final configuration of the pit. The total length of liner will depend on groundwater conditions as the pit is developed. If no inflow is experienced, a liner will not be beneficial or needed.

Also as discussed, we agreed that future installations of the liner will not require keying the liner in at the top, as was requested in the DRMS letter dated Oct. 7, 2010. This is because the purpose of the liner is for groundwater control, e.g., to keep groundwater out of the pit, and the stability of the liner is gained by placing backfill over the entirety of the liner, as opposed to attempting to anchor the liner at the top via a keyway. Thus the plan is, when and where liner in the future is installed, to install it in accordance with Figure 3 of our Oct. 4, 2010 letter (attached for reference).

Should you have any questions, please do not hesitate to contact me.

Sincerely,

FR: **WATER RESOURCE CONSULTANTS, LLC**

Paul C. Currier, P.E.

PCC/pcc

cc: Doug Grant, Grant Bros. Construction

/ 286-4.0 Reclaimed walls with liner.doc

244 Hutton Ave., Rifle, CO 81650 PH / Fax (970) 625-5433 pcurrier@wrc-llc.com

WATER RESOURCE CONSULTANTS, LLC
244 Hutton Ave Rifle, CO 81650
(970) 625-5433 www.WRC-LLC.com

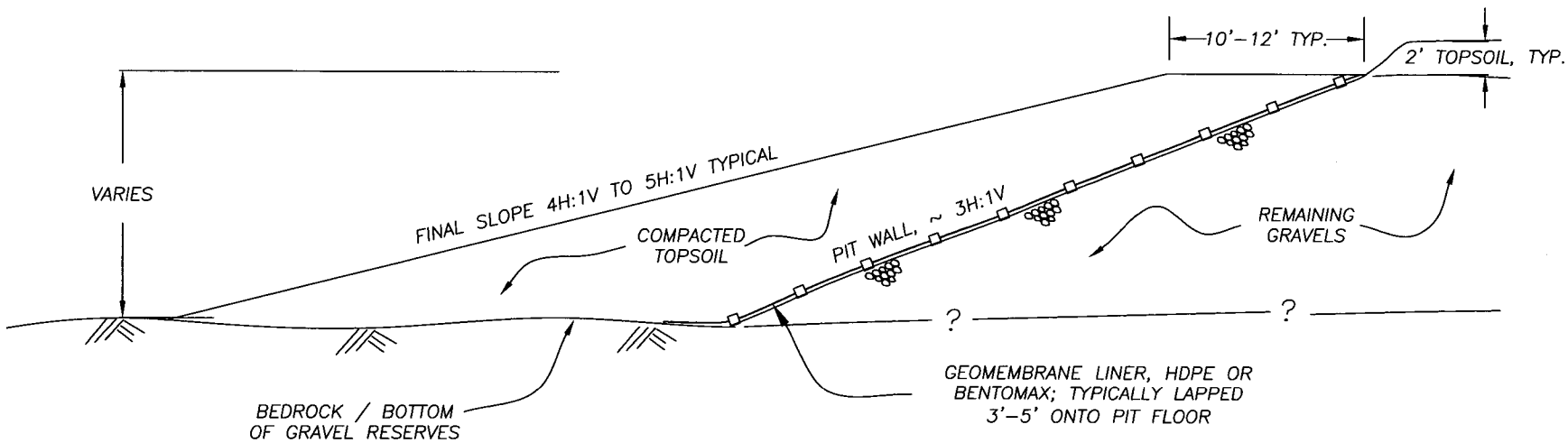
MINE NAME: LOESCH PIT
MINE ID#: M-1981-068
OPERATOR: GRANT BROS. CONST. LTD.
COUNTY: GARFIELD COUNTY, CO

TECHNICAL REVISION TR-003
UPDATE OF RECLAMATION PLAN
PIT WALL LINER
MINING PLAN

NO.	BY	DATE	REVISIONS
1	PCC	10.27.10	RECLAIMED WALLS

DATE: 04-OCT-2010
FILE: 286-4.0
DWG: 286-TR-02.dwg
BY: PCC
CHKD: PCC

FIG 1A



TYPICAL PIT WALL SECTION WITH LINER

N.T.S.

WATER RESOURCE CONSULTANTS, LLC
244 Hutton Ave. Rifle, CO 81650
(970) 625-5433 www.WRC-LLC.com

MINE NAME: LOESCH PIT
MINE ID#: M-1981-068
OPERATOR: GRANT BROS. CONST. LTD.
COUNTY: GARFIELD COUNTY, CO

TECHNICAL REVISION TR-003
UPDATE OF RECLAMATION PLAN
PIT WALL LINER
TYPICAL PIT WALL SECTION

NO.	BY	DATE	REVISIONS

DATE: 04-OCT-2010
FILE: 286-4.0
DWG: 286-TR-02.dwg
BY: PCC
CHKD: PCC

FIG 3