

STATE OF
COLORADO

Eschberger - DNR, Amy <amy.eschberger@state.co.us>

TR-3 Adequacy Review Response #1 Lamar Pit M1987-079

Jodi Schreiber <jodi@arycorp.com>

Mon, Jan 24, 2022 at 11:59 AM

To: "Eschberger - DNR, Amy" <amy.eschberger@state.co.us>

Amy,

Please see the attached Adequacy Review Response. I would like to run through a few items with you, if you have a few minutes.

Thanks!



Jodi Schreiber


839 Mackenzie Ave., Canon City, CO 81212

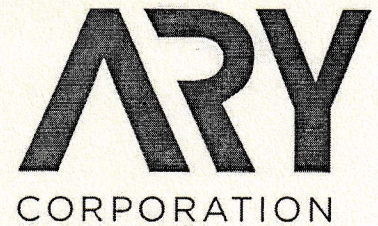
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"Success is not final, failure is not fatal; it is the courage to continue that counts. "

-Winston Churchill

4 attachments **IMG_20220124_0001.pdf**
3834K **Mining Map Phase1 r1.pdf**
275K **Mining Map Phase2 r1.pdf**
274K **Mining Map r1.pdf**
274K



January 24, 2022

Colorado Division of Reclamation, Mining and Safety
Attn: Amy Eschberger, Environmental Protection Specialist
1313 Sherman Street, Room 215
Denver, CO 80203

RE: Lamar Pit, M1987-079 Technical Revision #3, Adequacy Review #1 Response

Ms. Eschberger,

The following updates have been made to the original Technical Revision application. All Rite Paving and Redi Mix, Inc. requests the post reclamation use be a mixture of industrial/commercial and rangeland. As the attached maps show, approximately 14 acres will remain industrial/commercial while the remaining 25 acres will be rangeland. Of these 25 acres, 6 acres will remain undisturbed and 19 will be reclaimed to rangeland.

The total mining area of the two ponds is approximately 16 acres. The maximum depth will be approximately 15 feet. Backfill material will be purchased from local sources, including those currently permitted by All Rite Paving and Redi Mix and Fremont Paving and Redi Mix. As is currently permitted, All Rite will continue to use clean, recycled concrete as backfill material as well. It is anticipated that approximately 250,000 cubic yards of backfill material would be needed during the extent of mining operations. Activities have commenced and could last approximately 20 years.

Approximately 16 acres will need to be retopsoiled and revegetated. There is no topsoil on site and will need to be imported. It is anticipated that approximately 6,000 cubic yards of topsoil would be needed.

There is no overburden stockpiled onsite.

The areas where concrete could be exposed is during the reclamation of the ponds. Clean, recycled concrete has been permitted to be used for backfill material. Approximately 2 feet of overburden will be used on top of the clean, recycled concrete with approximately 3-5" of topsoil.

The maximum amount of groundwater exposed will not exceed 3.8 acres.

The maximum slope gradient is denoted on the Exhibit E Map and will range from .5% to 2%.

Below is the updated bond estimate:

ARY CORPORATION

A&S Construction Co.
Fremont Paving and Redi-Mix, Inc.
Ary Brothers Trucking, Inc.
All-Rite Paving & Redi-Mix, Inc.
Hard Rock Paving and Redi-Mix, Inc.

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Direct Tasks	Unit	Quantity	Cost	Total Cost
Placing Topsoil/Fines				
Bulldozer	Hours	10	\$145.00	\$1,450.00
Loader	Hours	10	\$145.00	\$1,450.00
Seeding				
Broadcasting	Hours	4	\$300.00	\$1,200.00
Seed Mix	Acre	19	\$6650.00	\$6,650.00
Mulch	Acre	19	\$3553.00	\$3,553.00
Tracking seed/mulch				
Dozer	Hours	4	\$154.00	\$616.00
Area Reclaimed	Acre	19		\$14,919.00
Mobilization Fee	Hours	10	\$100	\$1,000.00
Indirect Tasks				
Liability Insurance		100	1.55	\$155.00
Performance Bond		100	1.5	\$150.00
Profit		100	10	\$1,000.00
Job Superintendent	Hours	50	\$88.00	\$4,400.00
Miscellaneous Indirect			0.525	\$11,352.60
Total Bond				\$32,976.60

All weed control will be done manually. Below is a list of noxious weed species located in Prowers County and could be found onsite:

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Species	Infested Acres	Statewide Infested Acres	# of Counties Impacted	Management Plan (View Containment Map)	Data Collection Year
Absinth wormwood	0	711	16	Eliminate by 2018	2013
Black henbane	0	206	18	Eliminate by 2018	2013
Bouncingbet	0	1,278	38	Eliminate by 2022	2016
Bull thistle	0	6,899	44	Eliminate by 2020	2015
Canada thistle	Not reported	129,572	55	Contain; Figure 30.05	2015
Chamomiles**	0	2,139	42	Eliminate by 2022	2016
Chinese clematis	0	330	13	Eliminate by 2018	2013
Common tansy	0	266	29	Eliminate by 2022	2016
Common & Cutleaf teasel	13	3,222	23	Suppress; Eliminate by 2020	2015
Dalmatian toadflax	0	18,360	32	Eliminate by 2019	2014
Dames rocket	0	591	32	Eliminate by 2022	2016
Diffuse knapweed	0	68,968	45	Eliminate by 2019	2014
Eurasian watermilfoil	0	1,966	11	Eliminate by 2020	2015
Hoary cress	11	30,044	54	Eliminate by 2021	2014
Houndstongue	0	73,598	41	Eliminate by 2018	2013
Jointed goatgrass	78	10,167	41	Suppress	2010/2015
Leafy spurge	0	39,577	48	Eliminate by 2019	2014
Moth mullein	0	1,049	31	Eliminate by 2022	2016
Musk thistle	5	87,431	56	Eliminate by 2020	2015
Oxeye daisy	0	15,806	38	Eliminate by 2018	2013
Perennial pepperweed	0	21,739	39	Eliminate by 2021	2014
Plumeless thistle	0	1,182	13	Eliminate by 2018	2013
Russian knapweed	0	55,719	52	Eliminate by 2019	2014
Russian olive	Not reported	65,979	36	Contain; Figure 31.14	2012
Salt cedar	215	27,963	46	Suppress	2014
Scotch thistle	0	56,510	38	Suppress	2009/2015
Spotted knapweed	0	4,921	40	Eliminate by 2018	2013
Sulfur cinquefoil	0	768	30	Eliminate by 2022	2016
Wild caraway	0	1,690	30	Eliminate by 2022	2016
Yellow nutsedge	0	15,049	12	Eliminate by 2017	2012
Yellow toadflax	0	33,532	46	Eliminate by 2019	2014

If additional information is necessary, please feel free to contact me directly.

Sincerely,


Jodi Schreiber

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719-529-0916
jodi@arycorp.com

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RECLAMATION PLAN

1. General Reclamation Plan

Post-mining land use for the entire 39.3-acre site will be industrial with native grasses being used on all areas not actively disturbed through industrial activities. Reclamation will occur concurrently with mining. The current industrial area, composed of approximately 14 acres, will expand along the southern border of the pit through Phase I following its reclamation. The current pond will continue to be reclaimed by backfilling with material throughout the operation of the mine. When Phase I is completely mined out, Phase II will then begin. Phase II will be reclaimed in the same fashion. The road in between the two Phases will remain during mining activities to give access to the reclamation activities.

Both ponds will be backfilled with material and then topsoil will be replaced to a depth of 3-5 inches. Any area where concrete is exposed will be covered with 2-3 feet of overburden. Material for reclamation activities will be imported at a rate of no more than 50,000 cubic yards per year. The internal haul road will be reclaimed at the end of the mine life.

2. Reclamation Timetable

Reclamation will take place concurrently with mining with an additional estimated 24 months of reclamation commencing after mining is completed.

3. Revegetation Plan

The rangeland area that will be reclaimed, approximately 19 acres, will be revegetated with the following seed mix:

RECLAMATION SEED MIXTURE

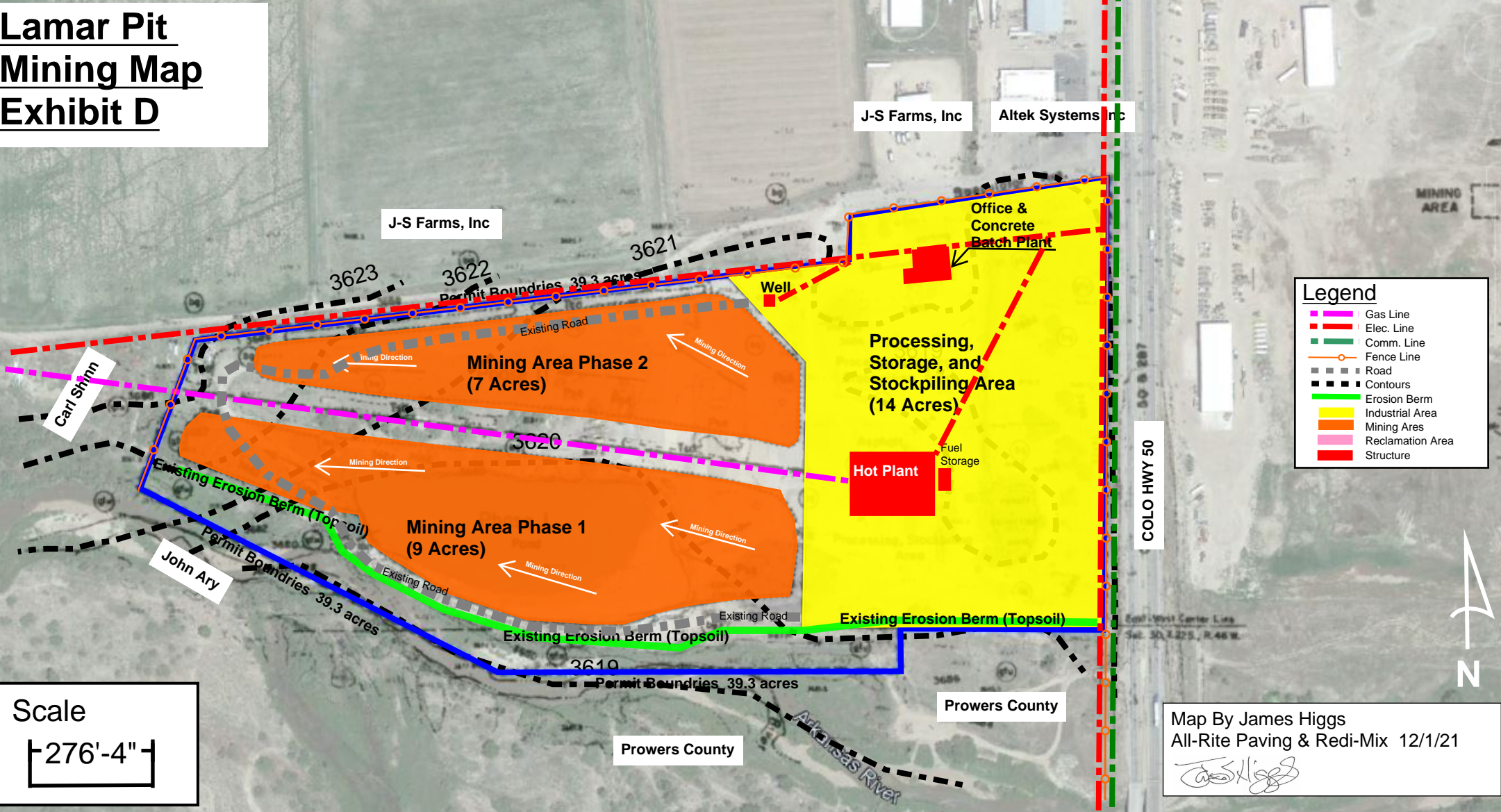
<u>Grass Species</u>	<u>% of Mix</u>	<u>Drilled Rate</u>	
		<u>Pounds</u> <u>PLS/Ac.</u>	<u>Bulk Pounds</u> <u>To Purchase</u>
Western Wheatgrass	25	4.0	6.1
Switchgrass	25	1.1	1.6
Sand Dropseed	25	0.1	0.1
Blue Grama	15	0.3	0.9
Alkali Sacaton	<u>10</u>	<u>0.1</u>	<u>0.15</u>
Total	100	5.6	8.9

Due to the mild grade, seed can be drilled in most areas, but broadcast seeding will be utilized where reclaimed perimeter slopes do not allow drilling. Certified weed free mulch may be crimped into the surface at 5.6 tons per acre. Seeding will take place during the fall following retopsoiling of slopes. Slopes will be regraded, backfilled, and retopsoiled as soon as they are able to be reclaimed and as additional mining areas become active. Broadcast seeding will be done at double the drill rate.

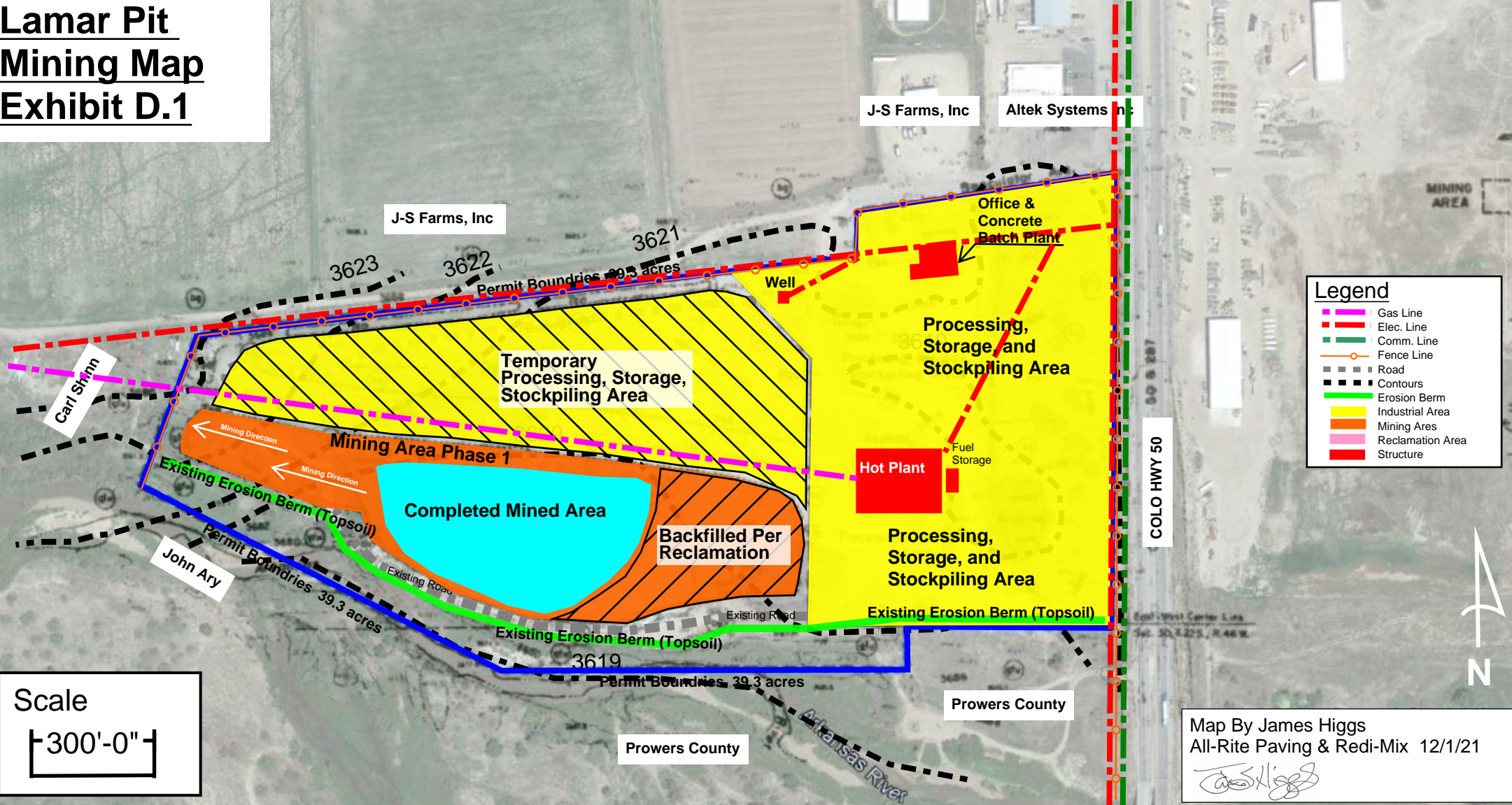
4. Weed Control

Measures will be employed for the control of any noxious weed species. Plants identified through the Colorado Noxious Weed Act (C.R.S. 35-5.5) and the Prowers County Noxious Weed List as undesirable and designated for management within the County will be removed. Plants identified as noxious weeds will be managed by control measures. The Division and Prowers County staff will be consulted regarding any weed infestation areas and control measures to be implemented prior to their initiation. All areas of the mining operation will be monitored closely throughout the year allowing the Operator to determine if any additional weeds become present.

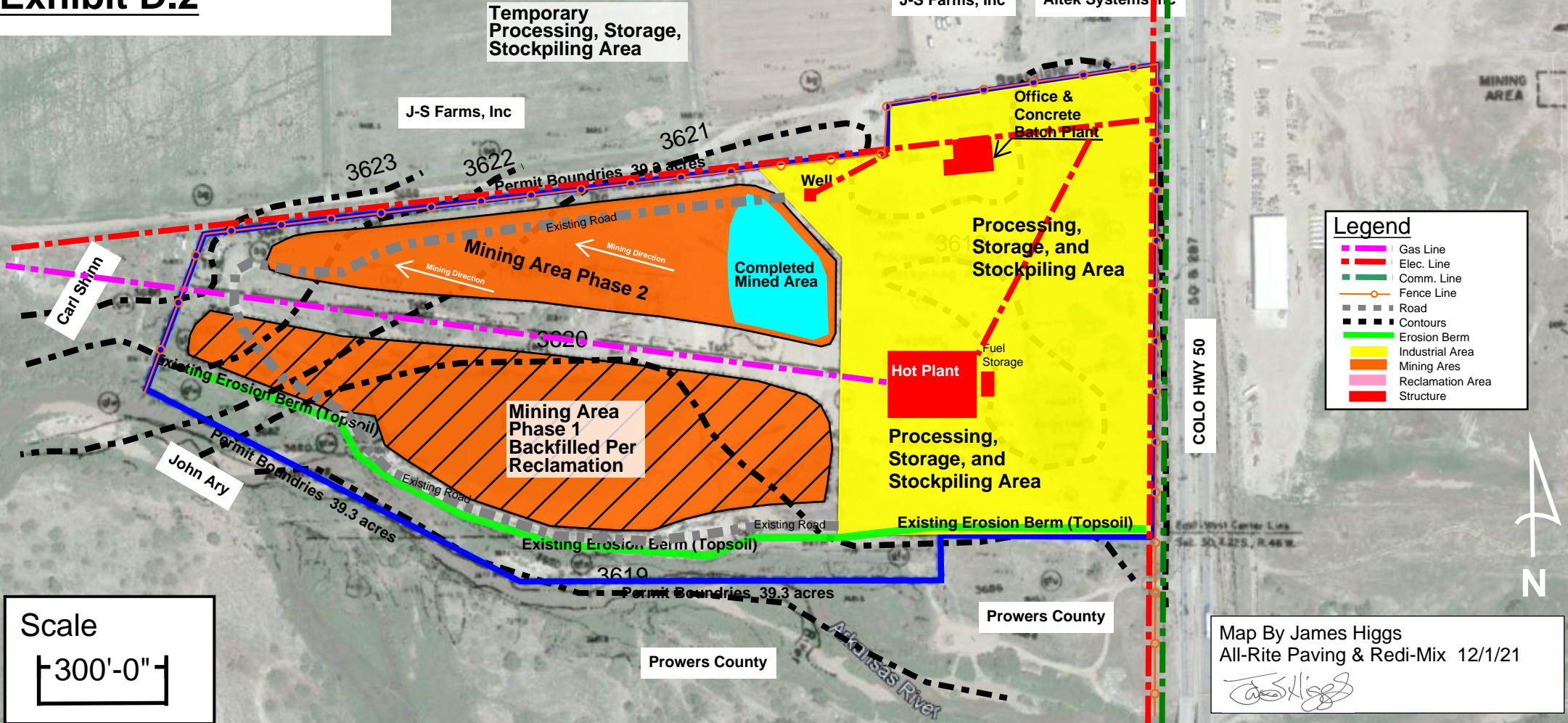
Lamar Pit
Mining Map
Exhibit D



Lamar Pit
Mining Map
Exhibit D.1



Lamar Pit
Mining Map
Exhibit D.2



Legend

- Gas Line
- Elec. Line
- Comm. Line
- Fence Line
- Road
- Contours
- Erosion Berm
- Industrial Area
- Mining Area
- Reclamation Area
- Structure

Scale

300'-0"

Map By James Higgs
All-Rite Paving & Redi-Mix 12/1/21

James Higgs