

February 1, 2022

Jodi Shreiber
All-Rite Paving & Redi-Mix, Inc.
P.O. Box 165
Canon City, CO 81215

RE: Lamar Pit, Permit No. M-1987-079, Technical Revision No. 3 (TR-3), Adequacy Review No. 2

Ms. Schreiber:

The Division of Reclamation, Mining and Safety (Division) has completed its review of your adequacy response submitted on January 24, 2022 for Technical Revision No. 3 (TR-3). After reviewing the materials submitted, the Division has identified the following adequacy items that must be addressed before an approval of TR-3 can be issued:

- 1) The Division has the following comments regarding the revised reclamation plan:
 - a. Please describe the location(s) at which imported backfill material will be temporarily stored on site. This information is needed in order for the Division to estimate the push/haul distance required for the bond calculation.
 - b. Please provide an estimated volume of backfill material that will be stored on site at any time.
 - c. Please confirm the operation plans to backfill the pits concurrently with mining, and that no more than 3.8 acres of open (unbackfilled) pit will exist at any time.
- 2) The Division has the following comments regarding the operator's bond estimate:
 - a. Please include costs for importing topsoil for reclamation. The Division estimates approximately 10,218 cubic yards of topsoil will need to be imported to the site for reclamation (19 acres x 4 inches replacement depth). This amount should be broken down by cost per cubic yard and include costs for purchase plus transportation to the site.
 - b. Please include costs for backfilling and grading the proposed pits (max 3.8 acres at any time based on proposed reclamation plan).
- 3) The Division has the following comments regarding all maps submitted:
 - a. All revised maps are signed by James Higgs and dated "12/1/2021". This is the same date that was on the original maps submitted on December 9, 2021. However, the maps have been revised since that time. Please ensure all maps include the date they were most recently revised.



- 4) The Division has the following comments regarding the (3) Exhibit D - Mining Plan Maps submitted:
- a. Please explain why the small stormwater pond shown on the current approved mining and reclamation plan maps in the southeastern corner of the permit area is not shown on any of the revised maps. Is this pond still present and in use by the operation? If so, it should be included on the mining and reclamation plan maps.
 - b. On the Exhibit D map - please show the structure owner's name for the gas line, electric line, and communication line, as required by Rule 6.4.3(g). The owner's name should be shown for any other structures located on or within 200 feet of the affected lands which are not owned by the operator.
 - c. On the Exhibit D.2 map – there is a label “Temporary Processing, Storage, Stockpiling Area” located to the north of the permit area. Please place this label in the correct location or remove it from the map.
- 5) The Division has the following comments regarding the Exhibit E - Reclamation Plan Map submitted:
- a. This map shows only a portion of the existing topsoil berm along the southern edge of the site will remain after reclamation (south of the industrial area). However, the previous reclamation plan map showed the full length of this berm remaining after reclamation. Is the revised map accurate? If so, please provide an estimated volume of topsoil that will be available on site for reclamation. This information is needed in order for the Division to determine how much topsoil will need to be imported to the site for reclamation. If the entire length of the berm will remain (as previously depicted), please revise this map accordingly.

This completes the Division's 2nd adequacy review of the materials submitted for TR-3. The decision date for TR-3 is currently set for **February 9, 2022**. If additional time is needed to address the adequacy items, an extension request must be received by our office prior to the decision date.

If you have any questions, you may contact me by telephone at (303) 866-3567, ext. 8129, or by email at amy.eschberger@state.co.us.

Sincerely,



Amy Eschberger
Environmental Protection Specialist

Cc: Michael Cunningham, DRMS