



December 27, 2022

Jim Doody  
Grand Junction Pipe & Supply Co.  
556 Struthers Avenue  
Grand Junction, CO 81501

**Re: Delta Paving Gravel Pit, File No. M-1998-105,  
Amendment Application (AM-01) – Final Adequacy Review**

Mr. Doody:

The Division of Reclamation, Mining and Safety (Division) has reviewed the adequacy responses related to the AM-01 application for the Delta Paving Gravel Pit (from Lewicki and Associates, dated 12 December 2022). We have no more additional comments. Please see the enclosed memorandum from Peter Hays regarding the geotechnical stability exhibit. It lists some future requirements related to compliance with Division rules.

The Division will contact you regarding the revised reclamation cost estimate for the Delta Paving Gravel Pit. We need to complete our review of it in the near future. After that task is completed, we can approve AM-01.

If you have any questions, please contact me at [rob.zuber@state.co.us](mailto:rob.zuber@state.co.us) or (720) 601-2276.

Sincerely,

Robert D. Zuber  
Environmental Protection Specialist

Enclosure: Memorandum related to geotechnical stability exhibit

Copied via e-mail: Michael Cunningham, DRMS  
Ben Langenfeld, Lewicki & Associates



**ENCLOSURE**



## MEMORANDUM

Date: December 23, 2022

To: Rob Zuber; Division of Reclamation, Mining & Safety

From: Peter Hays; Division of Reclamation, Mining & Safety

**Re: Final Review of Geotechnical Stability Exhibit, Grand Junction Pipe & Supply Co.,  
Delta Paving Gravel Pit, File No. M-1998-105, AM1**

---

The Division of Reclamation, Mining and Safety (Division/DRMS) reviewed the geotechnical stability exhibit adequacy response submitted by Greg Lewicki and Associates, PLLC (Lewicki) received on December 12, 2022 for the Delta Paving Gravel Pit 112c permit amendment application (AM1), File No. M-1998-105.

In accordance with Table 1 - Recommended Factors of Safety for Slope Stability Analysis for Operations and Reclamation within Section 30.4 of the Policies of the Mined Land Reclamation Board (MLRB) effective May 16, 2018, the Division will require the Operator to comply with the factor of safety (FOS) of 1.5 for critical structures and 1.3 for non-critical structures in static conditions and 1.3 for critical structures and 1.15 for non-critical structures in seismic conditions, since the Applicant utilized generalized strength measurements in the analysis.

Based on the information provided by the Operator, the Division accepts the Lewicki slope stability report as an alternative to the Operator obtaining agreements with all structure owners within 200-feet of the affected lands, if structure agreement cannot be obtained by the Operator.

If groundwater is intercepted and/or the soils differ from the expected and modeled profiles, the Operator must contact the Division immediately and reevaluate the slope stability analysis based on the updated information. Please note any transgression from the proposed slope geometries and/or proposed offsets will be considered a violation, if the amendment application is approved and issued by the Division.

If you have any questions regarding these adequacy items, please contact me at [peter.hays@state.co.us](mailto:peter.hays@state.co.us) or (303) 866-3567, Ext. 8124.

