

February 22, 2023

Elliott Russell  
Colorado Division of Reclamation, Mining, and Safety  
1313 Sherman St, Rm 215  
Denver, CO 80203

Delivered Via Email

**RE: Tellier Pit M-1998-058**  
**Technical Revision 02, Adequacy Response 3**

Mr. Russell:

United Companies has reviewed your February 13, 2023 adequacy review for the Tellier Pit technical revision (TR02) and is providing the below-outlined response.

#### DRMS Comment

*In response to Item 8, you provided a revised version of the updated Reclamation Plan Map. This revised map now contains two wetland areas, one in each of the mining areas, however their size and location do not match the previously approved plan. Additionally, in response to Item 2 you have already clarified that the TR2 catchment area is in addition to the wetland areas, however the revised map shows the catchment area now replaces the wetland area for the Phase II Mine Block. Lastly, the three drainage ditches which carry surface water to supply the wetlands are not included on the map. The permit record reflects the approved wetland areas were to offset the impacts of the access road crossing the drainage and associated wetlands that were determined by an informal wetlands investigation and then a subsequent site visit by the the U.S. Army Corps of Engineers (USACE). The approved wetland areas were also proposed to fulfil a request by the Division of Wildlife (now CPW) to mitigate wildlife impacts. During the 1998 permitting process, the Applicant stated they were in the process of preparing a Nationwide Section 14 Road Crossing 404 Permit application and proposed the use of the two wetland areas as mitigation for the 404 permit. Given this, TR2 cannot include a change to the approved wetland areas. You may submit a subsequent Technical Revision if you wish to modify the approved wetland areas. This revision would need to be accompanied by documentation from, or correspondence with, the USACE and CPW regarding the proposed change. At this time, for TR2 to be approved, please submit a revised Reclamation Plan Map with the approved wetland areas and drainage ditches as depicted on the current approved Reclamation Plan Map (received October 26, 1998).*

According to the 1998 permit file the wetlands are to address the entrance road crossing as part of a nationwide permit approval by USACOE and to improve wildlife habitat in reclamation at the behest of Colorado Parks and Wildlife. According to a comment letter from Colorado Parks and Wildlife (then CDOW) to Routt County:

*“Also, after speaking with Mr. Tellier and Mr. Croft, they have made a verbal commitment to modify their intended reclamation efforts to include a few small wetland areas.”*

The 1998 reclamation plan map does not specify the acreage of these small wetland areas, but lays out their general location and size. Since the reclamation plan was originally approved in the later 1990s, mining has taken place at Tellier Pit and completed. United Companies personnel are conducting reclamation of the site. The final topographic arrangement of the site is slightly different than that originally proposed in 1998. This necessitates shifting the small wetland areas to locations where they will be more successful: low points where natural water flow will reach them and sustain the wetland vegetation. A revised reclamation plan map (Map F-1 Reclamation Plan) is attached that shows these new locations while maintaining the size of wetland area depicted on the original 1998 reclamation plan map.

United Companies is completing reclamation activities at the site. United welcomes feedback from CPW during the final reclamation and bond release process.

Regards,



Ben Langenfeld, P.E.  
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LEGEND

BUILDINGS AND RELATED STRUCTURES

Building

Fence

BASELINE CONTOURS

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Approximate of indefinite

Intermediate

Approximate of indefinite

Supplementary

LAND SURVEYS

Public Land Survey System

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Range or Township labels

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Mining claim or property monument

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Light duty road, paved

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Road block, berm, or barrier

Gate on road

Cattle crossing guard

Railroad

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Perennial stream/ditch

Perennial river

Intermittent stream/ditch

Intermittent river

Dam

Perennial lake/pond

Intermittent lake/pond

Dry lake/pond

Elevated aqueduct, flume, or conduit

Buried aqueduct, flume, or conduit

Waterwell

Spring or seep

Drainage Basin

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Vegetation

Wetlands

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Power transmission line, pole, tower

Power transmission line, buried

Telephone/data line, above ground

Telephone/data line, buried

Pipeline (non-water), above ground

Pipeline (non-water), buried

POST-RECLAMATION CONTOURS

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Approximate of indefinite

Intermediate

Approximate of indefinite

Supplementary

Map F-1 Reclamation Plan

Tellier Pit

DRMS Permit Number: M1998058

United Companies

Mine Entry Location: Latitude: 40.48239 Longitude: 106.94840

State: CO County: Routt Nearest Town: Milner

Section: 17 Township: 6N Range: 65W P1M 6

Major Watershed: Yampa River MSHA ID: #88

Map Scale: 1"=100'

0 100 200

Map Georeferencing Information: Datum: NAD83 Projection: CO NORTH

Survey Source: County LIDAR Drawn by: GLA Date: 02/22/23

Imagery Source: Drone Checked by: GLA Date: 02/22/23

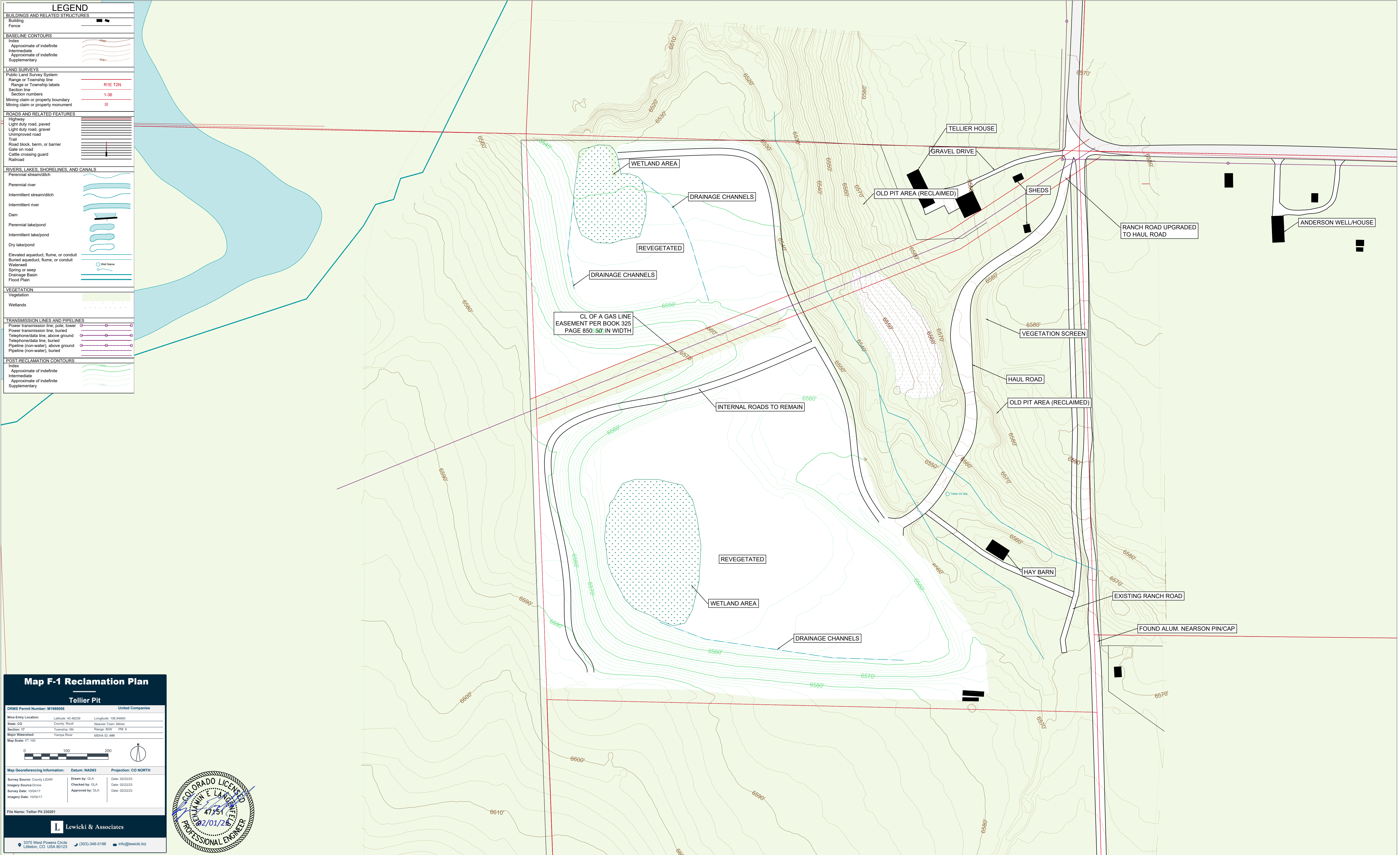
Survey Date: 10/04/17 Approved by: GLA Date: 02/22/23

Imagery Date: 10/04/17

File Name: Tellier Pit 230201

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## Adequacy Response #3

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To: Elliott Russell - DNR <elliott.russell@state.co.us>  
Cc: "Burkey, Jason K (CRH Americas Materials)" <jason.burkey@na.crh.com>

Mon, Feb 27, 2023 at 8:25 AM

Good morning Elliott,

Please take a look at the attached adequacy response #3. Please let me know if you have any questions. Thank you!

### **Tyra Bartuska**

CO / NM Group Environmental Manager

### **United Companies and Telluride Gravel**

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### **2 attachments**

 **TR02 Adequacy Response.pdf**  
201K

 **Tellier Pit 230222-Map 2 - Reclamation Plan.pdf**  
2279K