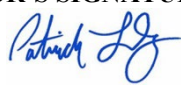




MINERALS PROGRAM INSPECTION REPORT
PHONE: (303) 866-3567

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.

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| MINE NAME: Irwin/Thomas Mine | MINE/PROSPECTING ID#: M-2016-054 | MINERAL: Sand and gravel | COUNTY: Boulder |
| INSPECTION TYPE: Surety-Related Inspection | WEATHER: Clear | INSP. DATE: May 24, 2023 | INSP. TIME: 10:00 |
| OPERATOR: Holcim - WCR, Inc. | OPERATOR REPRESENTATIVE: Stacey Churchill | TYPE OF OPERATION: 112c - Construction Regular Operation | |
| REASON FOR INSPECTION: Surety Related | BOND CALCULATION TYPE: | BOND AMOUNT: \$2,747,911.00 | |
| DATE OF COMPLAINT: NA | POST INSP. CONTACTS: None | JOINT INSP. AGENCY: None | |
| INSPECTOR(S): Patrick Lennberg | INSPECTOR'S SIGNATURE:  | SIGNATURE DATE: June 2, 2023 | |

GENERAL INSPECTION TOPICS

This list identifies the environmental and permit parameters inspected and gives a categorical evaluation of each. No problems or possible violations were noted during the inspection. The mine operation was found to be in full compliance with Mineral Rules and Regulations of the Colorado Mined Land Reclamation Board for the Extraction of Construction Materials and/or for Hard Rock, Metal and Designated Mining Operations. Any person engaged in any mining operation shall notify the office of any failure or imminent failure, as soon as reasonably practicable after such person has knowledge of such condition or of any impoundment, embankment, or slope that poses a reasonable potential for danger to any persons or property or to the environment; or any environmental protection facility designed to contain or control chemicals or waste which are acid or toxic-forming, as identified in the permit.

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

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

OBSERVATIONS

The Irwin/Thomas Mine (M2016-054) was inspected by Patrick Lennberg of the Division of Reclamation, Mining, and Safety (Division/DRMS). The inspection was completed in response to a partial acreage release request (AR-2), submitted in accordance with Rule 4.17, received by the Division on May 15, 2023. The site was previously inspected by the Division on January 13, 2023 in response to a partial acreage release request (AR-1). The Division approved AR-1 on January 19, 2023. Stacey Churchill representing the Operator, Holcim – WCR, Inc., was present during the beginning of the inspection.

The Irwin/Thomas Mine is located in Boulder County at the southeastern edge of Longmont, Colorado and is accessed from the northeast off N 119th Street. The site is situated at the confluence of Left Hand Creek and St. Vrain Creek. The approved post-mining land use is agriculture. A mine sign was posted at the primary mine entrance pursuant to Rule 3.1.12.

Per Rule 4.17.2(1) the Division sent notice of the release request to the Boulder County Commissioners, Boulder Planning Director, the Longmont Soil Conservation District, the various landowners, and the Operator. The Division has not received any comments from the noticed parties.

The release request is for 23.54 acres located along the west side of Mining Area 1 (MA-1). These acres, by review of the assessor's website, is the future location of potential residential housing construction. Currently, the acres are agricultural fields, contain storm water infrastructure for both residential and commercial development, and roadways.

The Irwin/Thomas mine has begun mining activities stripping and stockpiling topsoil and overburden at Cell 1 in MA-1. The Division approved TR-1 and is awaiting submission of the additional financial warranty amount calculated as part of TR-1. The Revision will not be issued or considered finalized until the new warranty amount has been accepted by the Division. During adequacy review of TR-1 it was determined that AR-1 did not release entire acreage amount originally intended and this release is to remove the balance of unaffected land to be current with what was approved during TR-1.

Based on observations made during this inspection the request for partial release of the permitted area will be approved. The release of 23.54 acres will reduce the permit area to 209.3 acres from 232.84 acres. Additionally, this release will reduce MA-1 to 124.8 acres. Prior to affecting land within Mining Areas 2, 3, or 4, the Operator must submit and obtain Division approval of a Technical Revision to increase the maximum disturbed area to more than the currently approved 124.8 acres. The disturbed acreage was increased during TR-1.

Notice of the Division's decision regarding the release request will be sent under a separate cover letter.

Photographs taken during the inspection are attached.

Please contact Patrick Lennberg (303)866-3567 ext. 8114 or email at patrick.lennberg@state.co.us if you have any questions regarding this report.

Inspection Contact Address

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Holcim - WCR, Inc.
1687 Cole Blvd., Suite 300
Golden, CO 80401

cc: Jared Ebert; DRMS

ec: Barbara Brunk, Resource Conservation Partners, LLC, barbb@dgmlc.com
Wyatt Webster, Holcim – WCR, Inc., wyatt.webster@holcim.com

PHOTOGRAPHS



Photo 1: Mine sign



Photo 2: Release area looking SE



Photo 3: Infrastructure constructed to support residential and commercial development



Photo 4: Infrastructure constructed to support residential and commercial development, looking west



Photo 5: Release area looking south



Photo 6: Release area looking southwest



Photo 7: Looking northwest across release area



Photo 8: Looking west across release area