




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.

MINE NAME: Bonser Pit	MINE/PROSPECTING ID#: M-2000-156	MINERAL: Gravel	COUNTY: Larimer
INSPECTION TYPE: Monitoring	INSPECTOR(S): Brock Bowles	INSP. DATE: February 15, 2022	INSP. TIME: 10:00
OPERATOR: Coulson Excavating Company, Inc.	OPERATOR REPRESENTATIVE: Ken Coulson	TYPE OF OPERATION: 112c - Construction Regular Operation	
REASON FOR INSPECTION: Normal I&E Program		BOND CALCULATION TYPE: None	
DATE OF COMPLAINT: NA		BOND AMOUNT: \$659,234.94	
WEATHER: Cloudy		JOINT INSP. AGENCY: None	
INSPECTOR'S SIGNATURE: 		SIGNATURE DATE: April 18, 2022	

The following inspection topics were identified as having Problems or Possible Violations. OPERATORS SHOULD READ THE FOLLOWING PAGES CAREFULLY IN ORDER TO ASSURE COMPLIANCE WITH THE TERMS OF THE PERMIT AND APPLICABLE RULES AND REGULATIONS. If a Possible Violation is indicated, you will be notified under separate cover as to when the Mined Land Reclamation Board will consider possible enforcement action.

INSPECTION TOPIC: Gen. Compliance With Mine Plan

PROBLEM/POSSIBLE VIOLATION: Problem: Coulson Excavating Company, Inc is not following the approved mine reclamation plan. The current reclamation plan needs to be updated and clarified pursuant to C.R.S. 34-32.5-116 (1). The operator must provide sufficient information to describe or identify how the operator intends to conduct reclamation.

CORRECTIVE ACTIONS: The operator shall submit a Technical Revision, with the required \$216 revision fee, to update and clarify the current approved reclamation plan to reflect existing and proposed activities by the corrective action date.

CORRECTIVE ACTION DUE DATE: 6/07/22

OBSERVATIONS

This inspection was conducted by Brock Bowles of the Division of Reclamation, Mining and Safety (Division). Ken Coulson of Coulson Excavating Co (Operator) was present for the inspection. The Bonser Pit is located 3 miles east of Loveland. The site is an active 112c operation with 146 acres permitted and the post-mining land use is general agriculture. This inspection was carried out as a part of the Division's routine monitoring inspection program. At the time of the inspection it was cool, overcast and the ground was partly snow covered.

The mine entrance sign was in place facing CR 20E (photo 1).

The main facilities area is in an area known as cell 4, which has not yet been mined. It is on the west side of the permit area and contains the scale house, asphalt plant and some product stockpiles (photo 2).

A comparison of the approved reclamation plan and the current site conditions are illustrated on photo 3 below. A 2021 Google Earth Image was used to illustrate the current conditions because it is consistent with the conditions that were noted during the inspection. The current site conditions are significantly different than the approved reclamation plan as noted in the following 3 bullet points.

- A single 55 acre lake, approved in TR2, is supposed to be in the northern part of the permit area. The lake was to have a clay liner constructed in a clockwise fashion around the lake. Currently, the center portion of the 55 acre lake has been backfilled creating 4 separate ponds: Cell 3 to the south and 3 individual ponds to the north. The center backfilled area contains processing equipment and product stockpiles (photo 4).
- Cell 3 is the southern portion of the proposed 55 acre lake. It has been separated from the rest of the lake by the backfilled material. It is about 15 acres in size and contains water (photo 5). The slopes were graded to 3h:1v and were vegetated. The operator claims the pond is lined and SEO approved. DWR was contacted to confirm this point and they are not aware of any clay-lined ponds.
- Cell 2 is located in the southwest corner of the permit area. It is proposed to be a 2 acre lake. It has been excavated larger than the approved mining and reclamation plan and is now about 4 acres in size.

The backfill in the middle of the 55 acre lake, the creation of Cell 3 and the over excavation of Cell 2 are all significant deviations from the proposed reclamation plan. The operator needs to submit a technical revision within the next 60 days to update the reclamation plan to reflect the current conditions. See the first page of this report for additional information about corrective actions and corrective action due dates.

The 3 other lakes in the southwest corner are pre-1981 ponds and do not need an augmentation plan.

It was noted that Cell 2, Cell 3 and the 2 larger ponds north of the backfilled area all contained water. Google Earth was utilized to estimate the acreages of these ponds using the June 11, 2021 image. It's estimated that there are at least 35 acres of exposed ground water, not including the pre-1981 ponds. The SWSP for the Bonser Pit approved exposing 6.3 acres of water. The Division recognizes that the SWSP expired in August 2015 and an updated application has been submitted to DWR and is pending approval. When the new SWSP is issued the Division will determine if the parameters described in the SWSP are consistent with the conditions on the mine site.

The operator stated he is considering backfilling the 3 ponds north of Cell 3. A large amount of material will be needed to accomplish this task. There does not appear to be enough material generated from mining to backfill the remaining ponds. If the operator intends to backfill this area with inert material that was generated from outside the permit, a technical revision will need to be submitted to change the reclamation plan as per Rule 3.1.5(9) before backfilling begins.

PHOTOGRAPHS



Photo 1 – Mine entrance sign facing ECR 20



Photo 2 – Facilities area (future cell 4 area)



Photo 3 – Boundaries approved in TR2 (2021 Google Earth, imagery date 2021)



Photo 4 – Processing facilities located on backfilled area, north of Cell 3



Photo 5 – Cell 3, looking southwest

GENERAL INSPECTION TOPICS

The following list identifies the environmental and permit parameters inspected and gives a categorical evaluation of each

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

Inspection Contact Address

Ken Coulson
Coulson Excavating Company, Inc.
3609 North County Road 13
Loveland, CO 80538

Enclosure

CC: