



**COLORADO**  
Division of Reclamation,  
Mining and Safety  
Department of Natural Resources

October 11, 2023

Jason McGraw  
General Shale Brick, Inc.  
1845 W. Dartmouth Ave.  
Denver, CO 80110

**Re: Navajo Clay Pit, Permit No. M-1993-004, Technical Revision No. 3 (TR-03) Adequacy Review**

Dear Mr. McGraw:

The Division of Reclamation, Mining and Safety (Division/DRMS) has reviewed the content of the technical revision application (TR-03) for the Navajo Clay Pit submitted on October 4, 2023, and submits the following comments. The decision date is set for November 3, 2023. After reviewing TR-03, the Division has the following comments that need to be addressed prior to approval:

1. It's mentioned in Mine Plan Changes Exhibit D (c) "In 2023 the Division of Water Resources approved clay stockpile pad area stormwater pond as a livestock and erosion pond", please provide demonstration of that approval, such as an approval letter from the Division of Water Resources.
2. Under Exhibit G, it states "The pit will be backfilled 1'-5' above the static groundwater elevation". The Division requires that pits must be backfilled at least 2' above static groundwater elevation. Please correct this and commit to 2' above the static groundwater elevation minimum.
3. When addressing usage of inert fill, weight (500 tons) was provided. Instead, please provide approximate volume of inert material to be backfilled per Rule 3.1.5(9)(b).
4. Under the bond estimate, please provide approximate quantities used to find the cost for each task, including volume of materials and acreages.

If you require additional information, or have questions or concerns, please feel free to contact me by phone at (303) 866-3567, ext. 8147, or by email at [joel.renfro@state.co.us](mailto:joel.renfro@state.co.us).

Sincerely,

Joel Renfro



Recipient  
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Date

Environmental Protection Specialist

Cc:  
Harold Stickler, General Shale Brick, Inc.  
Amy Eschberger, DRMS