



November 9, 2023

Katie Conrado
Meeker Sand & Gravel, Inc.
P.O. Box 1550
Meeker, CO 81641

RE: Meeker Pit, File No. M-1976-038 , Amendment (AM-3) to Construction Materials Regular 112c Operation, Adequacy Review-1

Dear Ms. Conrado:

The Division of Reclamation, Mining and Safety (Division) is in the process of reviewing the above referenced application in order to ensure that it adequately satisfies the requirements of the Colorado Land Reclamation Act for the Extraction of Construction Materials (Act) and the associated Mineral Rules and Regulations of the Colorado Mined Land Reclamation Board for the Extraction of Construction Materials (Rules). During review of the material submitted, the Division determined that the following issue(s) of concern shall be adequately addressed before the application can be considered for approval.

Application Form:

1. On Page 2 of the application form, please select the Quarter/Quarter section for the mine location.
2. Page 2 of the application form, the Township is listed as 119 N, rather than 1 N. This is a typo. Please correct the page and resubmit.

6.4.1 EXHIBIT A - Legal Description

3. Please provide the quarter-quarter section of the legal description pursuant to Rule 6.4.1(1)(a).
4. On the Exhibit A-2 map please provide the coordinates to the entrance mine location pursuant to Rule 6.4.1(2)

6.4.2 EXHIBIT B - Index Map

Adequate



6.4.3 EXHIBIT C - Pre-mining and Mining Plan Map(s) of Affected Lands

5. Exhibit C-3 the Pre-mining Map still depicts the AM-2 proposed permit boundary which excludes the still permitted commercial and industrial area. Please revise this map to depict the proposed 124.20 ac permit boundary per Rule 6.4.3(d).
 - a. Note that this map does satisfy the requirements of Rule 6.4.3(a), (b), (c), (g) and (i).
6. Exhibit C-6 depicts the soil and vegetation information for the proposed expansion area. However, vegetation information for all the affected lands is required by Rule 6.4.3(e). Please either revise Exhibit C-6 to depict the entire proposed permit area or submit an additional map for the existing permit areas soil and vegetation information.
7. The Mine Plan Map is labeled as Exhibit D. Exhibit C is the map exhibit while Exhibit D is the narrative portion only. Please reliable the map accordingly and update any references throughout the exhibits. Rule 6.4.4(f).

6.4.4 EXHIBIT D - Mining Plan

8. Page 6 of the mine plan states “We will have vertical highwalls as we are actively mining. (10)” Other references throughout the application state that mining will occur at a 2H: 1V. Please clarify and ensure text is consistent throughout application.
9. The mine plan acknowledges that without use of explosives mining can only occur down to the hardpan. Please explicitly state if explosives will or will not be used in conjunction with this mining operation, Rule 6.4.4(i).

6.4.5 EXHIBIT E - Reclamation Plan

10. NRCS recommended that 3,000 pounds of clean (weed free) straw per acre be applied and crimped into place. Does MSG plan to apply straw mulch as recommended? This item is included in the Reclamation Cost Estimate, but the Reclamation Plan narrative does not clarify.
11. Please state if fertilizer will be used during final reclamation pursuant to Rule 6.4.5(f)(iii).
12. Please state if any nursery stock (shrubs or trees) will be planted during final reclamation pursuant to Rule 6.4.5(f)(iv).

6.4.6 EXHIBIT F - Reclamation Plan Map

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6.4.7 EXHIBIT G - Water Information

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6.4.8 EXHIBIT H - Wildlife Information

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6.4.9 EXHIBIT I - Soils Information

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6.4.10 EXHIBIT J - Vegetation Information

See question #6. Exhibit C-6 depicts the soil and vegetation information for the proposed expansion area. However, vegetation for information for all of the affected lands is required by Rule 6.4.3(e) and 6.4.10. Please either revise Exhibit C-6 to depict the entire proposed permit area or submit an additional map for the existing permit areas soil and vegetation information.

6.4.11 EXHIBIT K - Climate

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6.4.12 EXHIBIT L - Reclamation Costs

13. Please clarify when is the worst-case scenario for bonding?
14. Reclamation Costs were provided at a per acre cost rather than a project total worst-case scenario. Ensure that figures provided in Exhibit L are consistently presented in Exhibits D and E.
 - a. Update the table to include the CY or total quantity of the worst-case scenario for each task.
 - a. Provide the maximum haul distance of overburden/backfill for exterior highwall regarding
 - b. What is the maximum volume of overburden to be replaced to meet the minimum requirement of 24" of cover. What is the average haul distance to replace overburden?
 - c. What is the estimated CY of material required to be graded to reshape the shorelines of the existing recycle ponds and catch basins? Alternatively provide the Division with the dimensions of said pond.
 - d. What is the average haul distance for topsoil replacement?
15. The Reclamation cost estimate does not include a task for replacing 24" of overburden on the pit floor. Please update the Exhibit L table.
16. What task is "Dozer regrading 1 ac area outside of highwalls" referring to?

6.4.13 EXHIBIT M - Other Permits and Licenses

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6.4.14 EXHIBIT N - Source of Legal Right to Enter

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6.4.15 EXHIBIT O - Owner(s) of Record of Affected Land (Surface Area) and Owners of Substance to be Mined

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6.4.16 EXHIBIT P - Municipalities Within Two Miles

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6.4.17 EXHIBIT Q - Proof of Mailing of Notices to Board of County Commissioners and Soil Conservation District

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6.4.18 EXHIBIT R - Proof of Filing with County Clerk and Recorder

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6.4.19 EXHIBIT S - Permanent Man-made Structures

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1.6.2 ADDENDUM 1 - Notice Requirements - Affidavit of Posting Notice

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Public Notice

17. Provide proof of newspaper publication pursuant to Rule 1.6.2(1)(g)
18. Provide a copy of the receipt from the County Clerk and Recorder that additional/revised information to the application has been placed for public review Rule 1.6.2(1)(c)

Please submit your response(s) to the above listed issue(s) by **Monday, December 11, 2023** in order to allow the Division sufficient time for review. The decision date for your application is scheduled for January 10, 2024.

The Division will continue to review your application and will contact you if additional information is needed.

If you require additional information, or have questions or concerns, please feel free to contact me.

Sincerely,



Amy C Yeldell

Environmental Protection Specialist

Cc:

Travis Marshall, Senior EPS, DRMS