



26 October 2023

Kurt Thurmann | Environmental and Land Manager
Mountain Region | Holcim - WCR, Inc.
Mobile: (720) 329-8851
1687 Cole Blvd., Suite 300
Golden, CO 80401

RE: Holcim Quincy Pit, Permit; M2000080
TR3 Preliminary Adequacy

DRMS received the mine plan update for the Quincy Pit on 18 October 2023 and understands the following from the current permit and the updated TR3 submission:

Current Permit

- Operation: 112c
- Permitted acreage: 310 acres
- Disturbance: 36 acres at any one time comprising
 - 12 acres of prestripping
 - 12 acres mining and leveling
 - 12 acres in reclamation
- Current bond held: \$67,250

2021 Inspection:	Disturbance	121 acres
	Under Cultivation	70 acres

As per your Mine Plan Map submitted as TR3 DRMS understands:

- Reclaimed acreage: 86.7 acres
- Active area: 60.6 acres
- 2024 Mining area: 15.3 acres

There appears to be a discrepancy between the map submitted the approved mine plan map of 2021 and historic imagery as viewed on Google Earth. The approved mine plan map appears to be in error as historic imagery indicates the north area of 67 acres designated as reclamation has never been disturbed by mining. This area appears to have been continuously cropped.

Adequacy questions are numbered and italicized. Please respond to each numbered item with a text document explanation as well as an updated mine plan map.



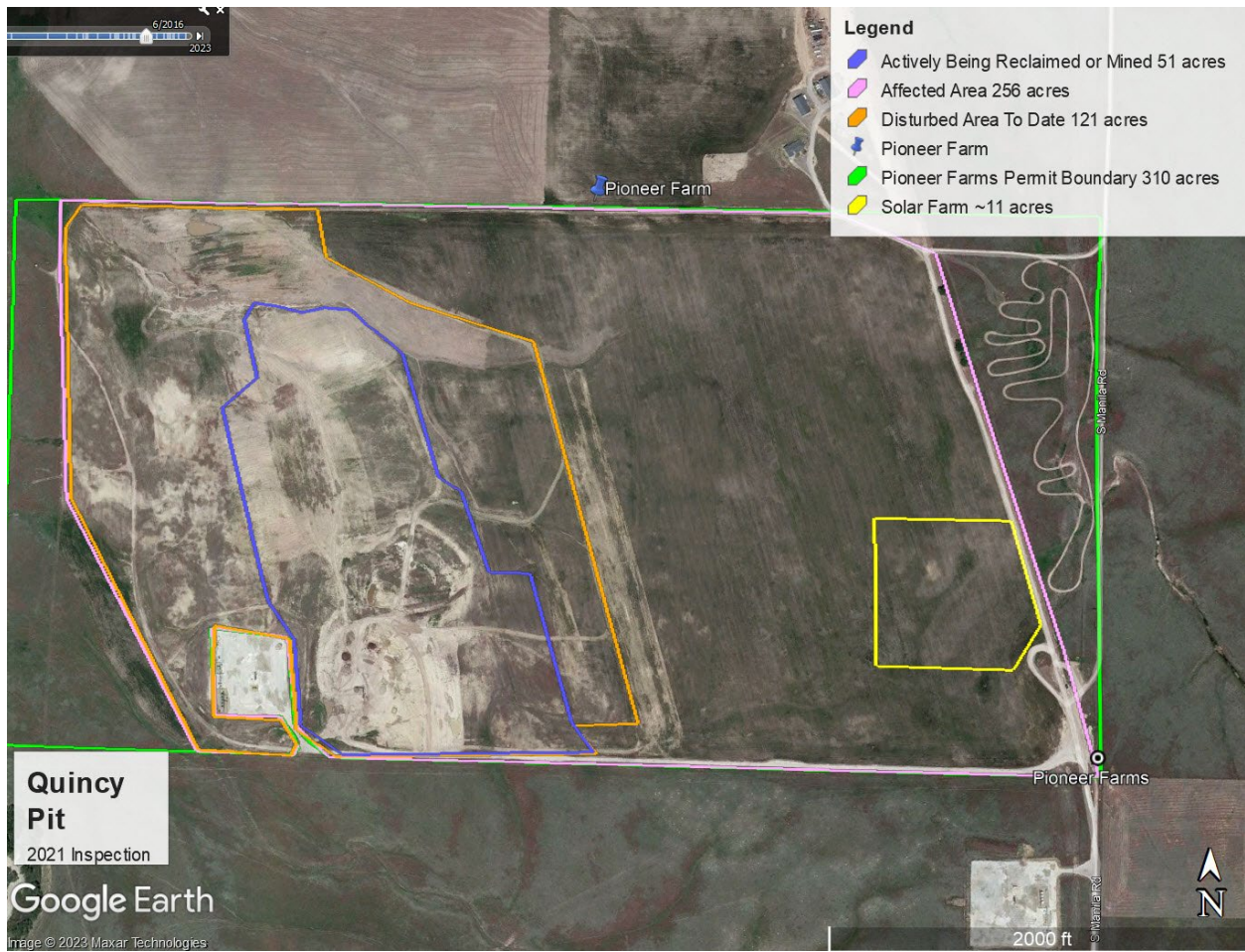
1. Please review the attached images and update the mine plan map as follows:

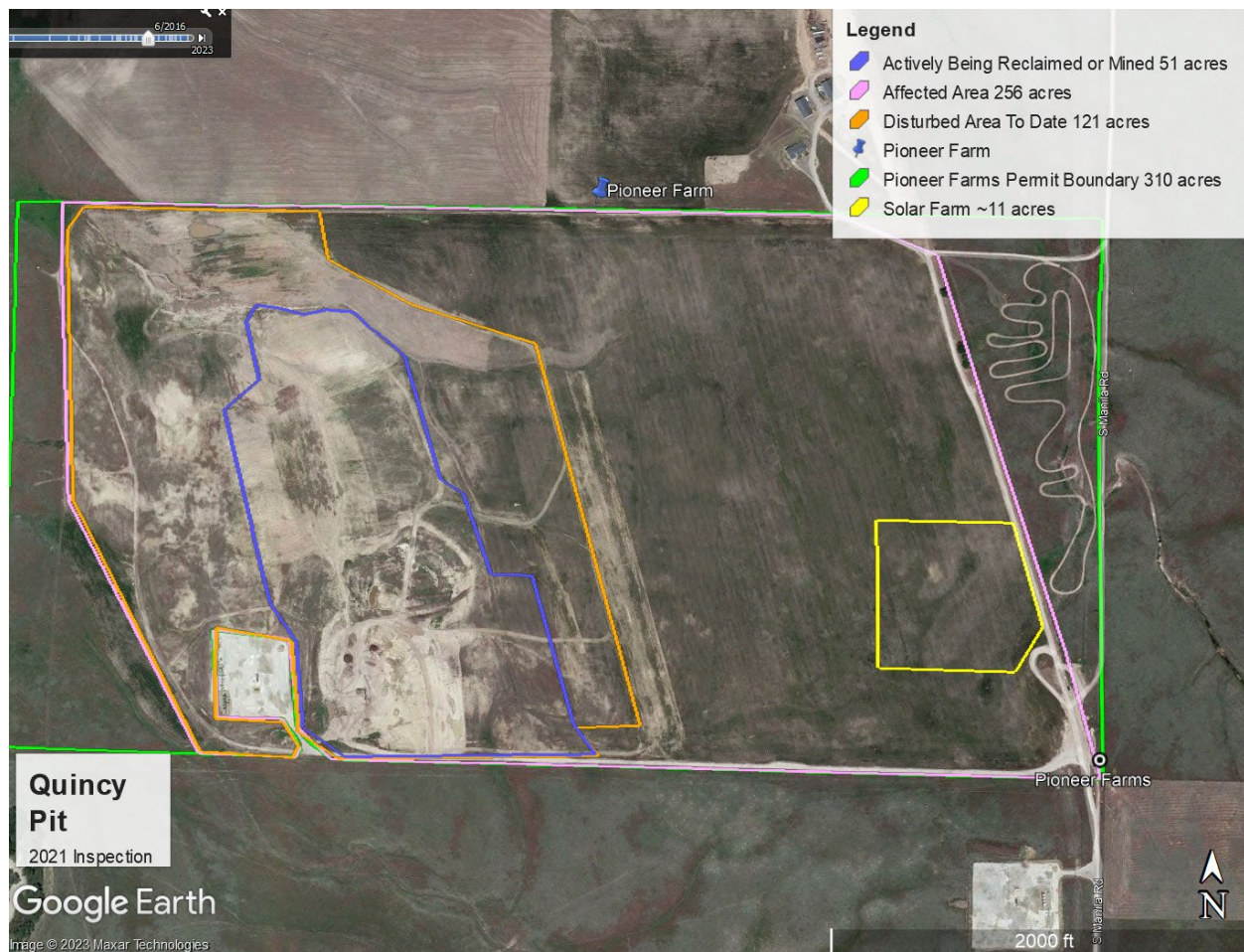
Correct the acreages for:

- Active reclamation*
- Affected area*
- Disturbed acres to date*
- Completed reclamation*
- Solar farm*
- Stripping proposed*

2. Please add to the Mining and Reclamation Plan Map the location and associated acreage of the solar farm.

3. DRMS is unclear what is meant by active area. Please clarify by explaining what activities are occurring in the active area.





Definition of Affected Land: Affected lands include but shall not be limited to private ways, roads, (except those roads excluded pursuant to Rule 1.1(3)), and railroad lines appurtenant to any such area; land excavations; exploration sites; drill sites or workings; refuse banks or spoil piles; evaporation or settling ponds; work, parking, storage or waste discharge areas; and areas in which structures, facilities, equipment, machines, tools or other materials or property which result from or are used in such operations are situated.

All lands shall be excluded that would be otherwise included as land affected but which **have been reclaimed** in accordance with an approved plan or otherwise, as may be approved by the Board. Affected land shall not include off-site roads which existed prior to the date on which notice was given or permit application was made to the office and which were constructed for purposes unrelated to the proposed mining operation and which will not be substantially upgraded to support the mining operation.

STATE OF
COLORADO

Reilley - DNR, Robin <robin.reilley@state.co.us>

M-2000-080 Technical Revision 3 Adequacy Response

1 message

Wyatt WEBSTER <wyatt.webster@holcim.com>
To: robin.reilley@state.co.us
Cc: Kurt THURMANN <kurt.thurmann@holcim.com>

Fri, Oct 27, 2023 at 9:45 AM

Robin,

Please find the response to the Preliminary Adequacy Letter. Let me know if you have any questions.

Thank you,

Wyatt Webster
Environmental & Land Manager
Holcim - WCR, Inc.
1687 Cole Blvd., Suite 300
Golden, CO, 80401
United States
Phone (702) 379-4623
wyatt.webster@holcim.com
www.holcim.us



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PEOPLE AND THE PLANET.

This email is confidential and intended only for the use of the above named addressee. If you have received this email in error, please delete it immediately and notify us by email or telephone.

2 attachments

M-2000-080 TR 03 Preliminary Adequacy Response.pdf
125K

M2000080_TR3_Reclamation-Mining_Map.pdf
13826K

Pioneer Farm Pit (Quincy)

M-2000-080

- Reclaimed (49.4 acres) = —
- Active (60.6 acres) = —
- 2024 Anticipated (15.3 acres) = —
- Affected Area (242.0 acres) = —
- Solar Farm (10.0 acres) = —
- DRMS Permit Boundary (310.0 acres) = —

Google Earth

1000 ft



S Manila Rd



October 27, 2023

Ms. Robin Reilley
Division of Reclamation, Mining and Safety
1313 Sherman Street, Room 215
Denver, CO 80203

Re: Permit No. M-2000-080 – Pioneer Farm Pit (Quincy)
Technical Revision Request 3 (TR-03) Preliminary Adequacy Response

Ms. Reilley,

Holcim – WCR, Inc. (Holcim) submits this letter as a response to the Preliminary Adequacy Letter dated October 26, 2023.

Mining & Reclamation Plan Revision

Holcim requests the following revisions to the Mining Plan:

- Completed reclamation acreage has increased to ~49.4 acres.
- Active reclamation acreage ~0.0 acres.
- Disturbed acres (reclaimed + active) to date ~110.0 acres.
- Current active stripping/mining acreage has increased to ~60.6 acres.
- Current DRMS Permit Boundary remains the same at ~310.0 acres.
- Holcim anticipates 2024 stripping/mining activities to include ~15.3 acres.
- Solar Farm ~10.0 acres.
- Affected area ~242.0 acres.

Active area is defined as areas that are being currently mined to include stripping and screening of material.

If you have any questions or require additional information, please contact me at (702) 379-4623 or at wyatt.webster@holcim.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'Wyatt Webster', written over a horizontal line.

Wyatt Webster
Environmental & Land Manager