



STATE OF  
COLORADO

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

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## M200008 TR3 ADQ3

1 message

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

Thu, Nov 16, 2023 at 12:10 PM

To: Wyatt WEBSTER <wyatt.webster@holcim.com>, Kurt THURMANN <kurt.thurmann@holcim.com>, Robin Reilley - DNR <robin.reilley@state.co.us>

Gentleman,

Please see the follow up attached below to the submission of Exhibits. Please update Exhibit D and send as a revised pdf document.

Thank you

Robin Reilley, M.S. GISP  
Environmental Protection Specialist II



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

P [303.866.3567](tel:303.866.3567) ext 8105 |

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Physical Address: 1313 Sherman Street St., Suite 215, Denver, CO 80203

Mailing Address: DRMS Room 215, 1001 E 62nd Ave, Denver, CO 80216

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**Adq3\_TR3 M2000080 Quincy Pit.pdf**

228K



**16 November 2023**

**Wyatt Webster** Environmental and Land Manager  
**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 #3**

DRMS received the mine plan update for the Quincy Pit on 18 October 2023. The preliminary adequacy was sent to Holcim on 26 October 2023 and responses were received from Holcim on 27 October 2023. A second adequacy was sent to Holcim WCR, Inc on 15 November with DRMS receiving the response on 15 November. This letter constitutes the third adequacy round.

1. Please submit the following Exhibits:
  - a. Exhibit C
  - b. Exhibit D
  - c. Exhibit E
  - d. Exhibit F
  - e. Exhibit L

**DRMS 16 November**

DRMS received the Exhibits requested above. Additional clarification and definition is required to be inserted into the exhibits as follows:

**Exhibit D Mining Plan as per Rule 6.4.4**

2. **6.4.4 d:** the size of area(s) to be worked at any one time. This should indicate acres in each of the following categories.
  - Pre stripping
  - Mining and grading
  - Reclamation
3. **6.4.4 e:** An approximate timetable to describe the mining operation. The timetable is for the purpose of establishing the relationship between mining and reclamation during the different phases of a mining operation. An Operator/Applicant shall not be required to meet specific dates for initiation, or completion of mining in a phase as may be identified in the timetable. This does not exempt an Operator/Applicant from complying with the performance standards of Rule 3.1. Such timetable should include:



- (i) an estimate of the periods of time which will be required for the various stages or phases of the operation;
- (ii) a description of the size and location of each area to be worked during each phase.

I'm available to answer any questions that you may have.

Thank you,



**Robin Reilley, M.S.GISP**  
**Environmental Protection Specialist II**

STATE OF  
COLORADO

Reilley - DNR, Robin &lt;robin.reilley@state.co.us&gt;

**Re: M200008 TR3 ADQ3**

1 message

**Wyatt WEBSTER** <wyatt.webster@holcim.com>  
To: "Reilley - DNR, Robin" <robin.reilley@state.co.us>  
Cc: Kurt THURMANN <kurt.thurmann@holcim.com>

Thu, Nov 16, 2023 at 1:54 PM

Apologies. Correct attachment below.

Thank you,  
**Wyatt Webster** | Environmental and Land Manager  
Holcim Group | Holcim - WCR, Inc.  
Address: 1687 Cole Blvd., Suite 300  
Golden, CO 80401  
Office & Mobile: (702) 379-4623  
Email: [Wyatt.Webster@holcim.com](mailto:Wyatt.Webster@holcim.com)

On Thu, Nov 16, 2023 at 1:54 PM Wyatt WEBSTER <[wyatt.webster@holcim.com](mailto:wyatt.webster@holcim.com)> wrote:  
Robin,

Please find the attached updated Exhibit D.

Thank you,  
**Wyatt Webster** | Environmental and Land Manager  
Holcim Group | Holcim - WCR, Inc.  
Address: 1687 Cole Blvd., Suite 300  
Golden, CO 80401  
Office & Mobile: (702) 379-4623  
Email: [Wyatt.Webster@holcim.com](mailto:Wyatt.Webster@holcim.com)

On Thu, Nov 16, 2023 at 12:11 PM Reilley - DNR, Robin <[robin.reilley@state.co.us](mailto:robin.reilley@state.co.us)> wrote:  
Gentleman,

Please see the follow up attached below to the submission of Exhibits. Please update Exhibit D and send as a revised pdf document.

Thank you

**Robin Reilley, M.S. GISP**  
Environmental Protection Specialist II



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**M-2000-080 Mining Plan & Reclamation Plan.pdf**

78K

#### **6.4.4 Exhibit D**

##### **Mining Plan**

The Holcim Quincy Pit is a topsoil and backfill source quarry that was initially permitted in 2000. The current 112 Permit area encompasses 310 acres. Approximately 11 acres were recently encumbered by a solar farm with a 10-year lease. This portion of the permitted area will not be mined for at least 10 years. Truck scales and scale house are located in the southeast corner of the permitted area. This area will remain for the life of the mine.

The target deposit is the sandy loam that is an ideal construction backfill material. Currently the material is mined to approximately eight feet below ground surface. Sandy loam lies below the current target material. The sandy deposit is found at 30 feet below ground surface and likely extends substantially further.

##### Mining Operation

This surface mine progresses from south to north and east to west, across the permitted area. The top six to eight inches of topsoil are salvaged and stockpiled to be used during reclamation. Any additional topsoil is screened and mixed with the loam to produce topsoil for landscaping. The sandy loam is screened and stockpiled to produce construction material. Mining relies on a loader and a screen. The topsoil removed from an undisturbed area is placed on a mined out area, smoothed out and prepared for the farm to plant. Depending on the seasonality of the crop, acres may be graded but not planted. Slopes will be contoured to 3H: 1V if necessary.

Pre-Stripping will constitute approximately 16 acres. Active mining and grading will constitute approximately 60 acres. Reclamation is currently approximately 50 acres. Pre-stripping and active mining/grading activities occur within one year depending on market conditions. Reclamation will immediately follow active mining/grading by replacing top soil material and coordinating with the tenant farmer. Revegetation will not occur with native species but instead will be prepared for cover cropping.

Mining equipment includes a loader and a water truck will be used to maintain roads and mitigate dust.

The mine floor is sandy loam that is very permeable. Surface water as precipitation and snow melt infiltrates within 72 hours. Perimeter berms are constructed along the edge of the mine area.

#### **6.4.5 Exhibit E**

##### **Reclamation Plan**

Post-mining land use is cropland with the landowner, the farmer, planting the crop i.e. revegetating. Surrounding land use is agriculture. Historically the land has produced winter wheat. The lease agreement states that the operator will prepare the mined out and graded area for cultivation.

Salvaged topsoil material will be replaced to an average depth of six inches. Stockpiled topsoil that isn't immediately used will be stockpiled, appropriately posted and segregated for use in reclamation. The placed topsoil will be roughened for erosion control or prepared for immediately cultivation, depending on the season. Every effort will be made to coordinate topsoil preparation with the farmer's planning season in the fall. Soil fertilizing and cultivation methods will be at the landowner's discretion.

Upon completion of mining, compacted areas including the interior haul road and high traffic area around the scale house will be ripped to a depth of eight inches and graded. The area will then be prepared as described in the preceding paragraph.

To address the potential for erosion during reclamation, contour furrows will be shaped into the surface at 50 foot intervals, perpendicular to the slope. The contour furrows will be approximately 20 feet long and spaced approximately 50 feet apart.