



November 3, 2023

Colorado Division of Reclamation, Mining, and Safety
Mr. Joel Renfro
Environmental Protection Specialist
1313 Sherman Street, Room 215
Denver, CO 80203

Re: M-1993-004 Navajo Mine, Elbert County, Colorado
Technical Revision No. 3 (TR-03) Adequacy Review

Dear Mr. Renfro:

General Shale Brick, Inc. (GSB) is in receipt of the inspection report for the Navajo Mine dated October 11, 2023. The adequacy review cites 4 problems:

Problem 1 Approval Letter for Livestock Pond

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.

The approval letter is enclosed.

Problem 2 Static Groundwater Elevation Minimum

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.

General Shale Brick Inc. commits to backfill minimum 2' above the static groundwater elevation.

Problem 3 Tonnage Versus Volume

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).

General Shale Brick Inc. will import 500 cubic yards of scrap brick.



Problem 4 Financial Warranty

Under the bond estimate, please provide approximate quantities used to find the cost for each task, including volume of materials and acreages.

General Shale has provided the table below. There were two errors found in the seeding cost and topsoil cost. These were addressed and updated below.

Item	Cubic Yards	Cost Per Cubic Yard	Cost
Backfill West Highwall	21,250	\$ 0.32	\$ 6,857.81
Backfill East Highwall	41,667	\$ 0.32	\$ 13,446.79
Backfill Pit	21,322	\$ 2.86	\$ 60,947.59
Place Topsoil	11,062	\$ 2.86	\$ 31,658.29
Equipment Mobilization			\$ 4,000.00
Total			\$ 116,910.48

Item	Acres	Cost Per Acre	Cost
Rip, seed, mulch and Crimp	16	\$ 1,050.00	\$ 16,800.00
Fertilizer	16	\$ 500.00	\$ 8,000.00
Weed Control	16	\$ 60.00	\$ 960.00
Mobilization			\$ 2,325.00
Total			\$ 28,085.00

Total Estimated Bond Cost	\$ 144,995.48
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Recommend Bond be set at	\$ 145,000.00
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Please feel free to contact me with any questions at 303-783-3058 or by email at jason.mcgraw@generalshale.com.

Sincerely,
General Shale Brick, Inc.

Jason E. McGraw P.E.
Mine Supervisor