

November 29th, 2023

PO Box 1550
Meeker, CO 81641

Colorado Division of Reclamation, Mining & Safety
1313 Sherman St.
Room 215
Denver, CO 80203

Meeker Sand & Gravel
Mine Permit#: M-1976-038

RE: Adequacy Response (AR-1) to Amendment (AM-3) to Construction Materials Regular 112c Operation

Greetings,

Attached please find our responses to Adequacy Review (AR-1). I have included any corresponding revised Exhibits and Maps that correlate with the response.

Please let me know if you have any questions, or require anything further. Thank you for your consideration of our application and responses to the Adequacy Review.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Katie L. Conrado', with a long, sweeping horizontal line extending to the right.

Katie L. Conrado
Meeker Sand & Gravel

Meeker Pit
M-1976-038
AM-3, AR-1

Application Form

1. On Page 2 of the application form, please select the Quarter/Quarter section for the mine location.
Corrected – included page 2 as: Corrected Application Pg2
2. Page 2 of the application form, the Township is listed as 119N rather than 1 N. This is a typo. Please correct the page and resubmit.
Corrected – included as: Corrected Application Pg2

Exhibit A – Legal Description

3. Please provide the quarter-quarter section of the legal description pursuant to Rule 6.4.1(1)(a).
Included following verbiage in Exhibit A: “Current + Proposed area lies within Sections 35 and 36, Township 1 North, Range 94 West of the 6th P.M (S/E Quarter section, S/W Quarter Quarter section)”
4. On the Exhibit A-2 map please provide the coordinates to the entrance mine location pursuant to Rule 6.4.1(2).
Included on Exhibit A-2

Exhibit B – Index Map – ADEQUATE

Exhibit C – Pre-Mining & Mining Plan Maps 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
Map C-3 revised to include industrial area within mine permit boundary
6. Exhibit C-6 depicts the soil and vegetation information for the proposed expansion area. However, the vegetation information for all the affected lands is required by Rule 6.4.3€. Please either revise Exhibit C-6 to depict the entire proposed permit area or submit an additional map for the existing permit area’s soil and vegetation map.
Revised Map C-6 to include entire permit area, with soil and vegetation info
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 relabel the map accordingly and update any references throughout the exhibits.
Mine Plan Map changed to be Exhibit C-7, references in narrative changed

Exhibit D – Mining Plan Map

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 2:h:1V Please clarify and ensure text is consistent throughout application.

Highwalls will exist, changed any text to reflect this

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)

Explosives will not be used in the mining operation (AM-3 9).

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.

Included in Reclamation narrative: 3000lbs of weed free straw will be applied per acre and crimped in place following seeding, according to NRCS recommendation (AM-3 AR-1 10).

11. Please state if fertilizer will be used during final reclamation pursuant to Rule 6.4.5(f)(iii)

No fertilizer will be used in final reclamation (AM-3 AR-1 11)

12. Please state if any nursery stock (shrubs or trees) will be planted during final reclamation pursuant to Rule 6.4.5(f)(iv)

No nursery stock (trees or shrubs) will be planted during final reclamation. (AM-3 AR-1 12)

Exhibit F – ADEQUATE

Exhibit G – ADEQUATE

Exhibit H – ADEQUATE

Exhibit I – ADEQUATE

Exhibit J – Vegetation Information

See question #6. Exhibit C-6 depicts the soil and vegetation info for the proposed expansion area. However, vegetation info for all of the affected lands is required by Rule 6.4.3le) and 6.410. Please either revise Exhibit C-6 to depict the entire proposed permit area or submit an additional map for the existing permit area's soil and vegetation information.

Included as Exhibit J-3 AM-3 AR-1

Exhibit K – ADEQUATE

Exhibit L – Reclamation Costs

13. Please clarify when is the worst-case scenario for bonding?

Included the following verbiage: "Worst-case scenario would occur when we begin mining in Phase I of expansion, this is when the overburden and topsoil piles would be the longest distance to move for reclamation at approximately 600' for both" (AM-3 AR-1 13)

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 & Worst-case scenario is the max disturbed/affected acreage of 50 acres. Total quantities needed for 50 acres disturbed has been included on the table.

- a. Update the table to include the CY or total quantity of the worst-case scenario for each task
Included on the table as requested
 - a. Provide the max haul distance of overburden/backfill for exterior highwall regrading
200'
 - b. What is the max volume of overburden to be replaced to meet the min. requirement of 24" of cover. What is the average haul distance to replace overburden?
Worst-case scenario would be approx. 600' to move overburden and at 50 acres disturbed, would require approximately 154,880 cy of material.
 - 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. *Reshaping of shorelines will not require any additional material, material from existing berms will be used. It is estimated that this would require 650 cy of material, which is present in the berms surrounding the recycle ponds and catch basins.*
 - d. What is the average haul distance for topsoil replacement?
Worst-case scenario is approximately 600'
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.
Added task to table to address this
16. What task is "Dozer regrading 1 ac area outside of highwalls" referring to?
This is referring to replacing overburden to cover floor following mining. Basically covering any area that is not a highwall.

Exhibit M – ADEQUATE

Exhibit N – ADEQUATE

Exhibit O – ADEQUATE

Exhibit P – ADEQUATE

Exhibit Q – ADEQUATE

Exhibit R – ADEQUATE

Exhibit S – Adequate

Addendum 1 – ADEQUATE

Public Notice

17. Provide proof of newspaper publication pursuant to Rul 1.6.21(1)(g)
The following files are included as required:
PROOF OF NOTICE Cover
Proof of Notice – Certified Mailings
Proof of Publishing column_affidavit
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)©
Included as file: Proof of Notice – Clerk & Recorder