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March 11, 2024

Colorado Division of Reclamation, Mining, & Safety Attn: Hunter Ridley 1313 Sherman Street, Room 215 Denver, CO 80203

Subject: Adequacy Review Response Technical Revision for Stocks Clay Mine (M-1977-324)

Ms. Ridley:

Please find the enclosed response to the Adequacy Review for the Technical Revision Request submittal for Stocks Clay Mine. This technical revision is being submitted as a corrective action to correct the issues identified during the inspection of the Stocks Clay Mine on February 23, 2023 and made known in the inspection report dated January 29, 2024.

If any further information is needed, please contact me at (719) 542-8278.

Sincerely,

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Julie A. Welte, P.E. V.P. Mining & Environmental

Enclosures (1)

TECHNICAL REVISION – ADEQUACY REVIEW RESPONSE #1 – NARRATIVE

<u>Item 1.</u> A modified Exhibit F – Reclamation Plan Map has been included with this adequacy review submittal. It shows the proposed reclamation plan for all possible future mining areas as shown on the updated Exhibit C – Mining Plan Map that was previously submitted with this TR.

Additionally, after a review of the Reclamation Plan of Conversion #001 (CN-001 approved on October 10, 1994) as well as Technical Revision #001 (TR-001 approved on March 30, 1998) for Stocks Clay Mine, no modifications are required for the narrative of the Reclamation plan. No unique reclamation tasks are required for the proposed future mining areas. As per TR-001, stable highwalls may be left in place with the remainder of the pit perimeter being sloped to 2H:1V.

It is estimated that Phase 2 of the mining plan has clay deposits that will provide 35 years of product given current economic demands. However, this estimate is likely to change based on varying economic demands, the depth of the sandstone on top of the clay deposit, the quality and thickness of the deposit of the clay body found, and other economic factors.

Item 2. The following estimates are for the full 35 acres of disturbance. This assumes 15 acres of major disturbance, including areas being actively mined and areas that are being used for stockpiling. An additional 15 acres is assumed to be of moderate disturbance, including areas being explored for future mining and areas in various stages of concurrent reclamation. The final 5 acres are assumed to be graded, backfilled, topsoiled, and seeded, but not yet released. Given these assumptions, a maximum of approximately 121,000 c.y. of overburden will need to be placed at any one time. Additionally, a maximum of 16,200 c.y. of topsoil will need to be placed.

Item 3. Separate .kmz files have been provided for the Mining Permit Boundary and each Phase as shown on the Mining Plan Map.

