



Memo to File

Date: April 5, 2024

To: Laserfiche File

From: Hunter Ridley, Environmental Protection Specialist

RE: Portland Limestone Quarries; Holcim (US) Inc.; Permit No. M-1977-344

On April 5, 2024, the Division of Reclamation, Mining and Safety (Division) issued Administrative Revision 1 (AD-1) for the Portland Limestone Quarries, Permit No. 1977-344, operated by Holcim (US) Inc. This revision was initiated by the Division in response to the discovery of a historic acreage discrepancy at the Bear Creek Quarry area of the Portland Limestone Quarries.

Prior to this administrative revision, the permitted acreage of the site was 5615.34 acres. This includes the original quarry area, called the Bear Creek Quarry (BCQ) and a southern quarry area, called the Red Creek Quarry (RCQ) area. The RCQ was added to the permit with the approval of AM-2 in March of 2024 and added 4076.08 acres to the permit for a total of 5615.34 acres. However, through Division review of AM-2 maps as well as digitization and measurement of the site's permit boundaries, the actual acreage of the BCQ was found to be less than the currently stated amount by ~213 acres.

Michael Toelle of Holcim (US) Inc. submitted a letter to the Division, dated March 30, 2024, describing the origin of the discrepancy, and clarifying the corrected total acreage amount of 1326.89. The letter also addresses a discrepancy in a release request amount from an Acreage Releasee request (AR-1) approved in 1990. AR-1 states that 31.5 acres were reclaimed and released, however modern measures of the area suggest that the acreage calculation is off by ~20 acres and that 51.47 acres were actually released. The correction of this miscalculation means that the currently affected acreage amount within the BCQ is 1275.42 acres. Holcim (US) Inc. cited the pronounced difference between the accuracy of 20th century surveying and more modern surveying capabilities as the most likely cause of both historic discrepancies.

The Division conducted thorough review of the site's Laserfiche file and used Google Earth to calculate total acreage amounts within the site's approved permit boundary. In conclusion, the Division agrees that 1326.89 is the correct permitted acreage amount for the BCQ area and that 1275.42 is the correct currently affected acreage amount.

This administrative revision revised the acreage values for Portland Limestone Quarries within the Permit System to reflect this correction. The revised permit acreage is now 5402.97 acres ($1326.89 + 4076.08 = 5402.97$). The maps submitted with AM-2 and the Bond Calculation approved under AM-2 both reflect this corrected acreage amount. Therefore, no additional Technical Revision or Surety Increase is required.

