




MINERALS PROGRAM INSPECTION REPORT
PHONE: (303) 866-3567

The Division of Reclamation, Mining and Safety has conducted an inspection of the mining operation noted below. This report documents observations concerning compliance with the terms of the permit and applicable rules and regulations of the Mined Land Reclamation Board.

MINE NAME: Yankee Gulch Minerals Project	MINE/PROSPECTING ID#: M-1999-002	MINERAL: Carbonates	COUNTY: Rio Blanco
INSPECTION TYPE: Monitoring	WEATHER: Clear	INSP. DATE: September 25, 2024	INSP. TIME: 10:00
OPERATOR: American Soda LLC	OPERATOR REPRESENTATIVE: Celina Akin	TYPE OF OPERATION: 112d-3 - Designated Mining Operation	
REASON FOR INSPECTION: Normal I&E Program	BOND CALCULATION TYPE: None	BOND AMOUNT: \$5,178,424.00	
DATE OF COMPLAINT: NA	POST INSP. CONTACTS: None	JOINT INSP. AGENCY: None	
INSPECTOR(S): Amy Yeldell	INSPECTOR'S SIGNATURE: 	SIGNATURE DATE: October 10, 2024	

GENERAL INSPECTION TOPICS

This list identifies the environmental and permit parameters inspected and gives a categorical evaluation of each. No problems or possible violations were noted during the inspection. The mine operation was found to be in full compliance with Mineral Rules and Regulations of the Colorado Mined Land Reclamation Board for the Extraction of Construction Materials and/or for Hard Rock, Metal and Designated Mining Operations. Any person engaged in any mining operation shall notify the office of any failure or imminent failure, as soon as reasonably practicable after such person has knowledge of such condition or of any impoundment, embankment, or slope that poses a reasonable potential for danger to any persons or property or to the environment; or any environmental protection facility designed to contain or control chemicals or waste which are acid or toxic-forming, as identified in the permit.

(AR) RECORDS----- <u>Y</u>	(FN) FINANCIAL WARRANTY----- <u>Y</u>	(RD) ROADS----- <u>N</u>
(HB) HYDROLOGIC BALANCE----- <u>Y</u>	(BG) BACKFILL & GRADING----- <u>Y</u>	(EX) EXPLOSIVES----- <u>N</u>
(PW) PROCESSING WASTE/TAILING---- <u>N</u>	(SF) PROCESSING FACILITIES----- <u>Y</u>	(TS) TOPSOIL----- <u>NA</u>
(MP) GENL MINE PLAN COMPLIANCE- <u>N</u>	(FW) FISH & WILDLIFE----- <u>N</u>	(RV) REVEGETATION---- <u>N</u>
(SM) SIGNS AND MARKERS----- <u>Y</u>	(SP) STORM WATER MGT PLAN---- <u>N</u>	(RS) RECL PLAN/COMP-- <u>Y</u>
(ES) OVERBURDEN/DEV. WASTE----- <u>N</u>	(SC) EROSION/SEDIMENTATION-- <u>N</u>	(ST) STIPULATIONS----- <u>N</u>
(AT) ACID OR TOXIC MATERIALS----- <u>NA</u>	(OD) OFF-SITE DAMAGE----- <u>N</u>	

Y = Inspected / N = Not inspected / NA = Not applicable to this operation / PB = Problem cited / PV = Possible violation cited

OBSERVATIONS

This inspection was conducted as part of the Colorado Division of Reclamation, Mining and Safety's (Division) normal monitoring program. The Yankee Gulch Minerals Project is a 112d (3) Hard Rock permit that is in final reclamation. The site is located 22 miles southwest of Meeker, Colorado in Rio Blanco County. Amy Yeldell of the Division conducted the inspection. Celina Akin represented American Soda LLC. No representative of the White River Field Office BLM was present for the inspection.

Availability of Records:

Previously the Division requested copies of all final plugged and abandoned (P&A) reports. This is in support of the Final Report documentation per Rule 5.4.1(3) and 5.7. In 2003 the Division received a number of P&A reports. The Division has also reviewed laserfiche for any other previously submitted P&A reports. Based on spreadsheet provided in 2023 summarizing all wells that were drilled the Division still needs final P&A reports for the following production wells:

- 20-33
- 28-21
- 29-26
- 29-28
- 29-34

Abandonment reports for all wells associated with site must be submitted prior to a final release/termination request.

Acid and Toxic Materials:

No fuel, other hazardous or toxic materials were observed on site.

Backfilling and Grading:

All grading and contouring is complete. No pits or stockpiles remain. The affected lands naturally blend with the surrounding topography.

Financial Warranty:

The total bond held between the Division and the BLM is \$7,444,531.00. The Division's portion is 5% of the total bond. The Division currently requires a financial warranty amount of \$236,424 for this site. The BLM holds the remaining bond amount. The bond was last increased in 2004 with AD-1. The bond was not recalculated with this inspection. The current bond amount is considered to be sufficient given that the site is in final reclamation.

Hydrologic Balance:

No exposed groundwater or other hydrologic concerns were observed.

Other:

No trash or other debris was observed.

Reclamation Success:

The Division walked the pipeline/access roads and pads along the ridge, see photos 1-6

Affected lands have been seeded and vegetation is well established. Generally, reclaimed areas are a diverse blend of grasses, forbs and shrubs. Overall, vegetative cover and density is comparable to the surrounding

undisturbed areas. Little to no weeds were observed. The operator should continue noxious weed management so long as the site remains permitted. Treatments with backpack sprayers and/or via horse are preferred at this time to limit vehicle disturbances to successfully reclaimed areas. Vegetation appears to be stabilizing the soils well and no signs of excessive erosion or sedimentation were observed. Of the portions of the well field observed, the Division feels that final reclamation has been achieved.

Based on this inspection it is determined that the Operator has successfully complied with the requirements of the Act, Rules and Regulations, and the approved Reclamation Plan, and the permit area is ready to be released from any further reclamation responsibility. If the operator submits a release request within 60 days this inspection will count as the acreage release inspection.

Given the vast nature of this site the Operator shall provide photo documentation (drone or aerial would also be helpful) of all pads and roads demonstrating that all affected lands have been reclaimed and that vegetation establishment is sufficient.

If a full/final release or a surety reduction is requested, the requirements of Rule 4.17.4(1) shall also be addressed in addition to the requirements of Rule 4.17.1, because this site is a DMO. This is the public notice requirement. The Operator should pay special attention to Rule 4.17.4(2) that states release of financial warranty may only be requested every 5 years.

Support Facilities On-site:

The plant area was also inspected, see photos 6-9. According to Ms. Akin this asset (building, equipment, land, etc.) has been transferred to another operator. Please provide the Division with documentation that American Soda is no longer responsible for the maintenance or removal of this feature. AM-1 changed the postmine land use for this area to commercial industrial, and therefore the area is eligible for a release.

Signs and Markers:

A mine sign was posted at the entrance to the mine site as required by Rule 3.1.12(1). (Photo 10).

Topsoil:

All topsoil has been applied; no stockpiles remain.

No problems or violations were noted during this inspection.

Responses to this inspection report should be directed to: Amy Yeldell at the Division of Reclamation, Mining and Safety, Rm 215, 1001 E 62nd Ave, Denver Co 80216. Direct contact can be made by phone at 303-866-3567 Ext 8183 or via email at amy.yeldell@state.co.us

Inspection Contact Address

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CC:

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Tom Cummings, BLM

PHOTOGRAPHS









