



November 26, 2024

Jason Burkey  
Oldcastle SW Group, Inc. dba United Companies of Mesa County  
2273 River Road  
Grand Junction, CO 81502

**RE: 15 Road Gravel Pit, Permit No. M-2002-114 , Technical Revision (TR-7), Adequacy Review-1**

Dear Mr. Burkey:

The Division of Reclamation, Mining and Safety (Division) is in the process of reviewing the above referenced Technical Revision in order to ensure that it adequately satisfies the requirements of the Colorado Land Reclamation Act for the Extraction of Construction Materials (Act) and the associated Mineral Rules and Regulations of the Colorado Mined Land Reclamation Board for the Extraction of Construction Materials (Rules). During review of the material submitted, the Division determined that the following issue(s) of concern need to be adequately addressed before the Technical Revision can be considered for approval. Please provide the following:

1. Please provide a revised Reclamation Plan (Exhibit E) and the Worst-Case Reclamation Cost Estimate (Exhibit L), which incorporates all proposed changes to the existing plan.
2. TR-7 proposes to eliminate wetland shelves. Page H-2 of AM-1 states "...shallow wetland areas upon lake filling and will fully comply with the COE permit for wetland removal and replacement." Additionally page M-1 states "7) An individual COE permit issued to disturb the minor wetlands..."
  - a. Under the COE can the wetlands shelf be eliminated entirely? If not, can the wetlands shelf of Lake 1 be constructed elsewhere?
  - b. Similarly on the east side of Lake 4 previously it was noted to be an existing marsh that should be avoided. The revised map does not show this area as being avoided. Will/ can this area also be affected? Is a replacement elsewhere required?
3. The revised Reclamation Plan Map F-1 has Lake 1 water surface at 17.6 ac which is the same as the previous maps despite no longer having a wetland shelf. Similarly Lake 4 is also slightly larger if the marsh is affected. Please provided:
  - a. The updated water surface area of Lake 1 and Lake 4
  - b. The remaining area where topsoil and ripping is required around Lake 1
  - c. The revised area requiring topsoiling and ripping around lake 4
  - d. The area associated with each seed mix (rangeland vs wetlands) for Lake 1 that still needs



to be applied. And the area that will be required for Lake 4.

4. The request for this TR was the result of a proposed bond calculation dated October 9, 2024. The Division had noted several items that needed to be clarified / updated.
  - a. The proposed calculation factored in the use of Biosolids and fertilizers. TR-7 only mentions omitting Biosolids. Will fertilizers still be used?
  - b. Seeding and mulching methods do not match. If wetlands are to be broadcast seeded, mulching should not be straw mulch crimped. Revise to drill seed or omit mulch.
  - c. Update user provided demo costs
    - i. Truck scale - \$ 4000.
    - ii. Office building with foundation - \$7000
    - iii. Storage building - \$300
    - iv. Fuel Storage: \$ 1000.

Please submit your response(s) to the above listed issue(s). Currently the TR is incomplete. Once filed a decision date will be set 30 days after. If any adequacy issues remain by the decision due date the Division may deny your request. The Division will continue to review your Technical Revision and will contact you if additional information is needed.

If you require additional information, or have questions or concerns, please feel free to contact me.

Sincerely,



**Amy Yeldell**

Environmental Protection Specialist

Ec: Travis Marshall, Senior EPS, DRMS