



STATE OF
COLORADO

Zuber - DNR, Rob <rob.zuber@state.co.us>

Second adequacy for Sprague Stone TR-01

1 message

Zuber - DNR, Rob <rob.zuber@state.co.us>

Thu, Jan 9, 2025 at 4:50 PM

To: Jason Andrews <jandrews@enganalytics.com>, spraguestone <spraguestone@gmail.com>

Hello -

Please see the attached letter with my second adequacy review. Please respond with a cover letter and revised exhibits through our electronic permitting portal.

Thank you,
Rob

Rob Zuber, P.E.
Environmental Protection Specialist
Active Mines Program



COLORADO
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Mining and Safety
Department of Natural Resources

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M2015006__DRMS_Second_Adequacy_Letter_TR1.pdf

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January 9, 2025

Mathew Sprague
Sprague Stone LLC
P.O. Box 294
Masonville, CO 80541

Re: Sprague Stone, Permit M-2015-006, Second Adequacy Review, TR-01

Dear Mr. Sprague:

The Division received the application for Technical Revision No. 1 (TR-01) on July 25, 2024 and the adequacy response from Jason Andrews of Engineering Analytics on January 3, 2025.

Regarding the mining and reclamation plans, I understand that no phases for future mining and reclamation are presented in the text or maps. This is acceptable given that:

- The site is relatively small
- The plan states that no more than 31.0 acres of backfilling and grading will be required at any time
- The pending reclamation cost estimate will be calculated for the worst-case condition.

I do have the following adequacy items that must be addressed before we can approve TR-01.

Exhibit C

1. The maps in this exhibit need to be updated. It appears that the maps submitted by Engineering Analytics last week (January 3, 2025) were labeled "Exhibit F" when they should have been labeled "Exhibit C."

Exhibit D

2. Per Rule 6.4.4(f), the depth of the overburden and the depth of the stone to be extracted should be discussed in Exhibit D. The exhibit should also include a discussion of the type of overburden and nature of the underlying stratum beneath the mined material.
3. This exhibit must include a discussion of the roads on the mine site, including dimensions, construction methods, and associated drainage structures (per Rule 6.4.4(j)).

Exhibit E

4. Update the references to maps, especially in the context of maps that are part of Exhibit C rather than Exhibit F.
5. The value for total current disturbance (bottom of page 1), less the area where reclamation has begun, should include the area for the topsoil pile. This area of 0.21 acres will need to be reclaimed



- (including ripping and seeding). So, rather than 27.9 acres, the value should be 28.11 acres.
6. Exhibit E must discuss the pre-mining slopes of the disturbed areas and the planned slopes after reclamation.
 7. The text must discuss the volume of waste rock that shall be pushed to backfill the mining areas. Also, there is a discussion on haul distances at the end of the Exhibit E text. Is that applicable to waste rock as well as overburden?

Exhibit F

8. A new map (or maps) is required to illustrate final reclamation conditions.

If you have any questions, please contact me at Rob.Zuber@state.co.us or by calling (720) 601-2276.

Thank you,



Robert D. Zuber, P.E.
Environmental Protection Specialist

Copied via email:

Amy Eschberger, DRMS
Amanda Sprague, Sprague Stone LLC
Jason Andrews, Engineering Analytics, Inc.