COLORADO
Division of Reclamation, Mining and Safety
Department of Natural Resources

February 19, 2025

Matthew Mueller
Siloam Stone, Inc.
315 N. 7th St
Canon City, CO 81212

RE: Pinon Mine, Permit No. M-1997-094; Technical Revision Application (TR-2), Revise Reclamation Plan, Preliminary Adequacy Review

Dear Mr. Mueller,

On February 3, 2025, the Division of Reclamation, Mining, and Safety (the Division/DRMS) received the technical revision application (TR-2) revising the reclamation plan to reduce the amount of growth medium to be replaced from 12 inches to 6 inches and remove the use of mulch. There are several items that were identified during the Division's review of the TR-2 application that require further clarification. Please provide a response and any supplemental items necessary to address the following items.

Rule 6.2 General Requirements of Exhibits

1. The map submitted does not meet the complete requirements of Rule 6.2.1(2). Please resubmit the map to include the following information:

    a. The name and signature of the qualified person that prepared the map, per Rule 6.2.1(2)(b).

Rule 3.1.10 Revegetation

2. An invoice from Ark Valley Weed for weed control services. The invoice date is October 14, 2024, and the invoice number is 520P. The same invoice was submitted with the Technical Revision (TR-4) application for the Bedrock Mine #1, Permit No. M-1997-086. Information about how the amount of the weed control services is allocated to the different permit areas is not provided. The costs cannot be attributed to the recalculation of the reclamation costs without a breakdown of how those costs are attributed to each permit. Additionally, to justify a prescribed cost for weed control tasks, a minimum of three estimates for this service should be provided to the Division.

Rule 6.4.12 Exhibit L – Reclamation Costs

3. The Division's estimated reclamation cost have been recalculated, and an updated

reclamation cost estimate (RCE) is attached with this report. The required reclamation cost estimate was calculated to be $13,573.00; $5,273.00 higher than the currently held financial warranty. Review the attached RCE and provide any comments or additional supplemental items to the Division.

This concludes the Division's preliminary adequacy review of the TR-2 application. The decision date for this revision is **March 5, 2025**. Please reply to this letter at least 5 days prior to the decision date, ***February 28, 2025***, to allow for the Division to review your response. If more time is needed to address these issues, an extension request must be submitted to the Division in writing prior to the decision date.

If you have any questions or concerns, please reach out to me at Jocelyn.carter@state.co.us or (720) 666-1065.

Sincerely,

Jocelyn Carter
Environmental Protection Specialist

Ec: Amy Eschberger, DRMS
Steve O'Brien, Environment, Inc.

Enclosures: Reclamation Cost Estimate (RCE)

COST SUMMARY WORK

Task description: **Cost Summary**

Site: **Pinon Mine** Permit Action: 2025 TR2 Permit/Job#: M1997094

PROJECT IDENTIFICATION

Task #: 000 State: Colorado Abbreviation: None
Date: 2/19/2025 County: Pueblo Filename: M094-000
User: JLC

Agency or organization name: DRMS

TASK LIST (DIRECT COSTS)

Task	Description	Form Used	Fleet Size	Task Hours	Cost
001	Topsoil: 6" over 2.70 acres	DOZER	1	4.36	$1,475
002	Revegetation	REVEGE	1	8.10	$5,909
003	Mob/Demob	MOBILIZE	1	3.34	$2,407
		SUBTOTALS:		**15.8**	**$9,791**

INDIRECT COSTS

OVERHEAD AND PROFIT:

Liability insurance:	2.02	Total =	$198
Performance bond:	1.05	Total =	$103
Job superintendent:	7.90	Total =	$626
Profit:	10.00	Total =	$979
		TOTAL O & P =	$1,906
		CONTRACT AMOUNT (direct + O & P) =	$11,697

LEGAL - ENGINEERING - PROJECT MANAGEMENT:

Financial warranty processing (legal/related costs):	$500	Total =	$500
Engineering work and/or contract/bid preparation:	4.25	Total =	$497
Reclamation management and/or administration:	5.00		$585
CONTINGENCY:	3.00	Total =	$294
		TOTAL INDIRECT COST =	$3,782
		TOTAL BOND AMOUNT (direct + indirect) =	**$13,573**

BULLDOZER WORK

Task description: **Topsoil: 6" over 2.70 acres**

Site: **Pinon Mine** Permit Action: 2025 TR2 Permit/Job#: M1997094

PROJECT IDENTIFICATION

Task #: 001 State: Colorado Abbreviation: None
Date: 2/19/2025 County: Pueblo Filename: 001
User: JLC

Agency or organization name: DRMS

HOURLY EQUIPMENT COST

Basic Machine: Cat D8T - 8SU
Horsepower: 310
Blade Type: Semi-Universal
Attachment: 1-shank ripper
Shift Basis: 1 per day
Data Source: (CRG)

Cost Breakdown:

		Utilization %
Ownership Cost/Hour:	$173.32	NA
Operating Cost/Hour:	$109.71	100
Ripper own. Cost/Hour:	$13.69	NA
Ripper op. Cost/Hour:	$1.39	15
Operator Cost/Hour:	$40.04	NA

Total unit Cost/Hour: $338.14
Total Fleet Cost/Hour: **$338.14**

MATERIAL QUANTITIES

Initial Volume: 2,178
Swell factor: 1.000
Loose volume: **2,178** LCY

Source of estimated volume: Division of Reclamation, Mining & Safety
Source of estimated swell factor: Cat Handbook

HOURLY PRODUCTION

Average push distance: 150 feet
Unadjusted hourly production: 634.3 LCY/hr

Materials consistency description: Partly consolidated stockpile 1.1

Average push gradient: -5 %
Average site altitude: 5,850 feet

Material weight: 2,650 lbs/LCY

Weight description: Decomposed rock - 25% Rock, 75% Earth

Job Condition Correction Factor		Source
Operator Skill:	0.900	(AB.AVG.)
Material consistency:	1.100	(CAT HB)
Dozing method:	1.100	(50% SL)
Visibility:	1.000	(AVG.)

Job efficiency:	0.830	(1 SHIFT/DAY)
Spoil pile:	0.900	(SSD-FC)
Push gradient:	1.115	(CAT HB)
Altitude:	1.000	(CAT HB)
Material Weight:	0.868	(CAT HB)
Blade type:	1.000	(PAT)

Net correction: 0.7873

Adjusted unit production: 499.38 LCY/hr
Adjusted fleet production: **499.38** LCY/hr

JOB TIME AND COST

Fleet size: 1 Dozer(s)
Unit cost: $0.677/LCY

Total job time: **4.36** Hours
Total job cost: **$1,475**

REVEGETATION WORK

Task description: **Revegetation**

Site: **Pinon Mine** Permit Action: 2025 TR2 Permit/Job#: M1997094

PROJECT IDENTIFICATION

Task #: 002 State: Colorado Abbreviation: None
Date: 2/19/2025 County: Pueblo Filename: 002
User: JLC

Agency or organization name: DRMS

FERTILIZING

Materials

Description	Units / Acre	Unit	Cost / Unit	Cost /Acre
			$	$
			Total Fertilizer Materials Cost/Acre	**$0.00**

Application

Description	Cost /Acre
	$
Total Fertilizer Application Cost/Acre	**$0.00**

TILLING

Description	Cost /Acre
Disc harrowing, 6" deep (MEANS 32 91 13.23 6100)	$117.61
Weed control spraying (MEANS 31 31 16.13 3100)	$338.80
Total Tilling Cost/Acre	**$456.41**

SEEDING

Seed Mix	Rate – PLS LBS / Acre	Seeds per SQ. FT	Cost /Acre
Blue Grama - Native	0.50	8.16	$10.66
Sideoats Grama - Butte	3.00	9.85	$72.47
Thickspike Wheatgrass - Critana	1.00	3.54	$8.15
Western Wheatgrass - Barton	2.00	5.05	$18.79
Needlegrass, Green - Lodorm	1.00	4.16	$8.65
Prairie Junegrass	0.50	26.58	$24.37
Totals Seed Mix	8.00	57.33	**$143.08**

Application

Description	Cost /Acre
Drill Seeding (DRMS Survey Cost)	$236.64
Total Seed Application Cost/Acre	**$236.64**

MULCHING and MISCELLANEOUS

Materials

Description	Units / Acre	Unit	Cost / Unit	Cost /Acre
			$	$
Total Mulch Materials Cost/Acre				**$0.00**

Application

Description	Cost /Acre
	$
Total Mulch Application Cost/Acre	**$0.00**

NURSERY STOCK PLANTING

Common Name	No / Acre	Type and Size	Planting Cost	Fertilizer Pellet Cost	Cost /Acre
					$
Totals Nursery Stock Cost / Acre					**$0.00**

JOB TIME AND COST

No. of Acres: 6.22
Estimated Failure Rate: 30%
*Selected Replanting Work Items: SEEDING

Cost /Acre: $836.13
Cost /Acre*: $379.72

Initial Job Cost: **$5,200.73**
Reseeding Job Cost: **$708.56**
Total Job Cost: **$5,909**
Job Hours: **8.10**

EQUIPMENT MOBILIZATION/DEMOBILIZATION

Task description: **Mob/Demob**

Site: **Pinon Mine** Permit Action: 2025 TR2 Permit/Job#: M1997094

PROJECT IDENTIFICATION

Task #: 003 State: Colorado Abbreviation: None
Date: 2/19/2025 County: Pueblo Filename: 003
User: JLC

Agency or organization name: DRMS

EQUIPMENT TRANSPORT RIG COST

Shift basis: 1 per day
Cost Data Source: CRG Data

Truck Tractor Description: GENERIC ON-HIGHWAY TRUCK TRACTOR, 6X4, DIESEL POWERED, 400 HP (2ND HALF, 2006)

Truck Trailer Description: GENERIC FOLDING GOOSENECK, DROP DECK EQUIPMENT TRAILER (25T, 50T, AND 100T)

Cost Breakdown:

Available Rig Capacities	0-25 Tons	26-50 Tons	51+ Tons
Ownership Cost/Hour:	$10.44	$22.18	$23.94
Operating Cost/Hour:	$26.48	$54.55	$55.65
Operator Cost/Hour:	$22.52	$22.52	$22.52
Helper Cost/Hour:	$0.00	$23.53	$23.53
Total Unit Cost/Hour:	$59.44	$122.78	$125.64

NON ROADABLE EQUIPMENT:

Machine Description	Weight/ Unit (TONS)	Owner ship Cost/hr/ unit	Haul Rig Cost/hr/unit	Fleet Size	Haul Trip Cost/hr/ fleet	Return Trip Cost/hr/ fleet	DOT Permit Cost/ fleet
Cat D8T - 8SU	52.21	$187.01	$125.64	1	$312.65	$125.64	$250.00
Drill/Broadcast Seeder with Tractor	25.00	$41.02	$59.44	2	$200.92	$118.88	$250.00
Subtotals:					**$513.57**	**$244.52**	**$500.00**

ROADABLE EQUIPMENT:

Machine Description	Total Cost/hr/ unit	Fleet Size	Haul Trip Cost/hr/ fleet	Return Trip Cost/hr/ fleet
Light Duty Pickup, 4x4, 1 T. Crew	$24.60	1	$24.60	$24.60
Subtotals:			**$24.60**	**$24.60**

EQUIPMENT HAUL DISTANCE and Time

Nearest Major City or Town within project area region:	PUEBLO	
Total one-way travel distance:	35.00	miles
Average Travel Speed:	55.00	mph
Total Non-Roadable Mob/Demob Cost * '* two round trips with haul rig:	$2,375.70	
Total Roadable Mob/Demob Cost ** ** one round trip, no haul rig:	$31.31	

Transportation Cycle Time:

	Non-Roadable Equipment	Roadable Equipment
Haul Time (Hours):	0.64	0.64
Return Time (Hours):	0.64	0.64
Loading Time (Hours):	0.20	NA
Unloading Time (Hours):	0.20	NA
Subtotals:	1.67	1.27

JOB TIME AND COST

Total job time:	**3.35**	Hours
Total job cost:	**$2,407**	