



COLORADO DIVISION OF RECLAMATION, MINING AND SAFETY

1313 Sherman Street, Room 215, Denver, Colorado 80203 ph(303) 866-3567

REQUEST FOR TECHNICAL REVISION (TR) COVER SHEET

File No.: M- 1996-096 Site Name: Glacier Rock Mine
County Larimer TR# _____ (DRMS Use only)
Permittee: Glacier Rock Gravel Company
Operator (If Other than Permittee): NA
Permittee Representative: Kyle Regan

Please provide a brief description of the proposed revision: _____
Clarify that mining will be performed at a near vertical side slope. Add recycled aggregate facility to the mining plan.

As defined by the Minerals Rules, a Technical Revision (TR) is: "a change in the permit or application which does not have more than a minor effect upon the approved or proposed Reclamation or Environmental Protection Plan." The Division is charged with determining if the revision as submitted meets this definition. If the Division determines that the proposed revision is beyond the scope of a TR, the Division may require the submittal of a permit amendment to make the required or desired changes to the permit.

The request for a TR is not considered "filed for review" until the appropriate fee is received by the Division (as listed below by permit type). Please submit the appropriate fee with your request to expedite the review process. After the TR is submitted with the appropriate fee, the Division will determine if it is approvable within 30 days. If the Division requires additional information to approve a TR, you will be notified of specific deficiencies that will need to be addressed. If at the end of the 30 day review period there are still outstanding deficiencies, the Division must deny the TR unless the permittee requests additional time, in writing, to provide the required information.

There is no pre-defined format for the submittal of a TR; however, it is up to the permittee to provide sufficient information to the Division to approve the TR request, including updated mining and reclamation plan maps that accurately depict the changes proposed in the requested TR.

Required Fees for Technical Revision by Permit Type - Please mark the correct fee and submit it with your request for a Technical Revision.

| <u>Permit Type</u> | <u>Required TR Fee</u> | <u>Submitted</u> (mark only one) |
|---|------------------------|-------------------------------------|
| 110c, 111, 112 construction materials, and 112 quarries | \$216 | <input checked="" type="checkbox"/> |
| 112 hard rock (not DMO) | \$175 | <input type="checkbox"/> |
| 110d, 112d(1, 2 or 3) | \$1006 | <input type="checkbox"/> |

February 20, 2025

Colorado Division of Reclamation and Mining Safety
Ms. Jocelyn Carter
1313 Sherman Street, Room 215
Denver, CO 80203

RE: Technical Revision – Glacier Rock Mine (Permit M-1996-096), Larimer County, Colorado

Dear Ms. Carter:

The Glacier Rock Company(the Operator) submits this Technical Revision in response to Corrective Actions identified during the Division's December 27, 2024 inspection of the Site. The text from the inspection report is reproduced in *italics* below.

PROBLEM #1: The approved mining plan call for working slopes no greater than 3H:1V; the working slopes appeared to be near vertical. The current mine plan needs to be updated and clarified pursuant to C.R.S. 34-32.5-112 (1)(c)(VI). The Operator must provide sufficient information to describe or identify how the Operator intends to conduct the operation.

CORRECTIVE ACTIONS: The Operator may bring the slopes back into compliance with the currently approved mining plan of no greater than a 3H:1V gradient and provide photographs to the Division by the corrective action due date. Alternatively, the Operator may submit a Technical Revision, with the required \$216 revision fee, to update and clarify the current approved mine plan to reflect existing and proposed activities by the corrective action date. The updated mining plan and map may be included in the Technical Revision application that is to be submitted to address the problem cited for the reclamation plan compliance; only one Technical Revision needs to be submitted.

The current iteration of the mining plan was approved on February 28, 2005 when the pit was converted from a 110 to a 112c permit. Section (b) of Exhibit D (Mining Plan) states that "Standard earthmoving equipment will be utilized for grading and contouring of the mine slopes. Slopes are proposed to be a maximum 3:1 gradient for side slopes." The operator contends that the initial intent of this section of the mine plan is to demonstrate that the slopes will be graded and contoured back to a 3V:1H after mining is complete, not that the slopes were going to be maintained at a 3V:1H slope during active mining. The record shows that this was also the Division's understanding of the permit since the approval of CN-1 until this latest inspection.

As shown in satellite images of the Site, mining has been performed with near vertical slopes since the amendment to a 112c permit in 2005. Observations of the near vertical highwall have been made by the Division in previous inspections without identifying a problem with complying with the current iteration of the Mine Plan. During the Division's July 10, 2020 inspection it was noted that, "Pit walls have an average height of 15 feet and near vertical slopes". As part of the corrective actions identified in the 2020 inspection, the Operator was required to increase bonding for the Site. The bonding increase included, "costs for backfilling the pit wall to 3H:1V slopes..."

The Operator agrees that this section of the mine plan can be interpreted as maintaining a 3V:1H mine slope while active mining, even though this has not been the interpretation by the Operator or the Division in the past. In order to clarify this section, the Permittee proposes to change Section (b) of Exhibit D to read:

"The pit will be mined at near vertical side slopes. Standard earth moving equipment will be utilized for grading and contouring the side slopes after completion of active mining in the area. Reclaimed side slopes are proposed to be a maximum of 3H:1V gradient."

INSPECTION TOPIC: Reclamation Success

PROBLEM #2: Portions of areas that have been reclaimed were found to be re-disturbed by an aggregate recycling yard operation. This is a problem for failure to follow approved reclamation plan, or current reclamation plan needs to be updated and clarified pursuant to C.R.S. 34-32.5-116 (1). The Operator must follow approved reclamation plan or provide sufficient information to describe or identify how the Operator intends to conduct reclamation.

CORRECTIVE ACTIONS: The Operator shall submit a Technical Revision, with the required \$216 revision fee, to update and clarify the current approved reclamation plan to reflect existing and proposed activities, including the details of the lease agreement with the Castle Rock Construction of Colorado LLC for the aggregate recycling operation by the corrective action date.

Castle Rock Construction of Colorado, LLC has a lease with the Operator to use the northwest portion of the Site(see Attached). The Operator agrees with the Division's estimation of 2.9 acres of formerly reclaimed area that have been re-disturbed. This 2.9 acres has been added to the mining plan map(see Attached). The 2.9 acre area will need to be reclaimed with 6-inches of topsoil and reseeded according to the approved plan after cessation of activities.

We appreciate your review. Should you have any questions, please contact us.

Sincerely,
CIVIL RESOURCES, LLC.



Kyle S. Regan, P.G.

Cc: Roger Hageman

Attachments:
Exhibit C – Mine Plan Map



CIVIL RESOURCES
8308 COLORADO BOULEVARD
FIRESTONE, CO 80504
303.833.1416
WWW.CIVILRESOURCES.COM

GLACIER ROCK COMPANY
1009 COUNTY ROAD 5
FORT COLLINS, CO 80524
CONTACT: ROGER HUGHMAN

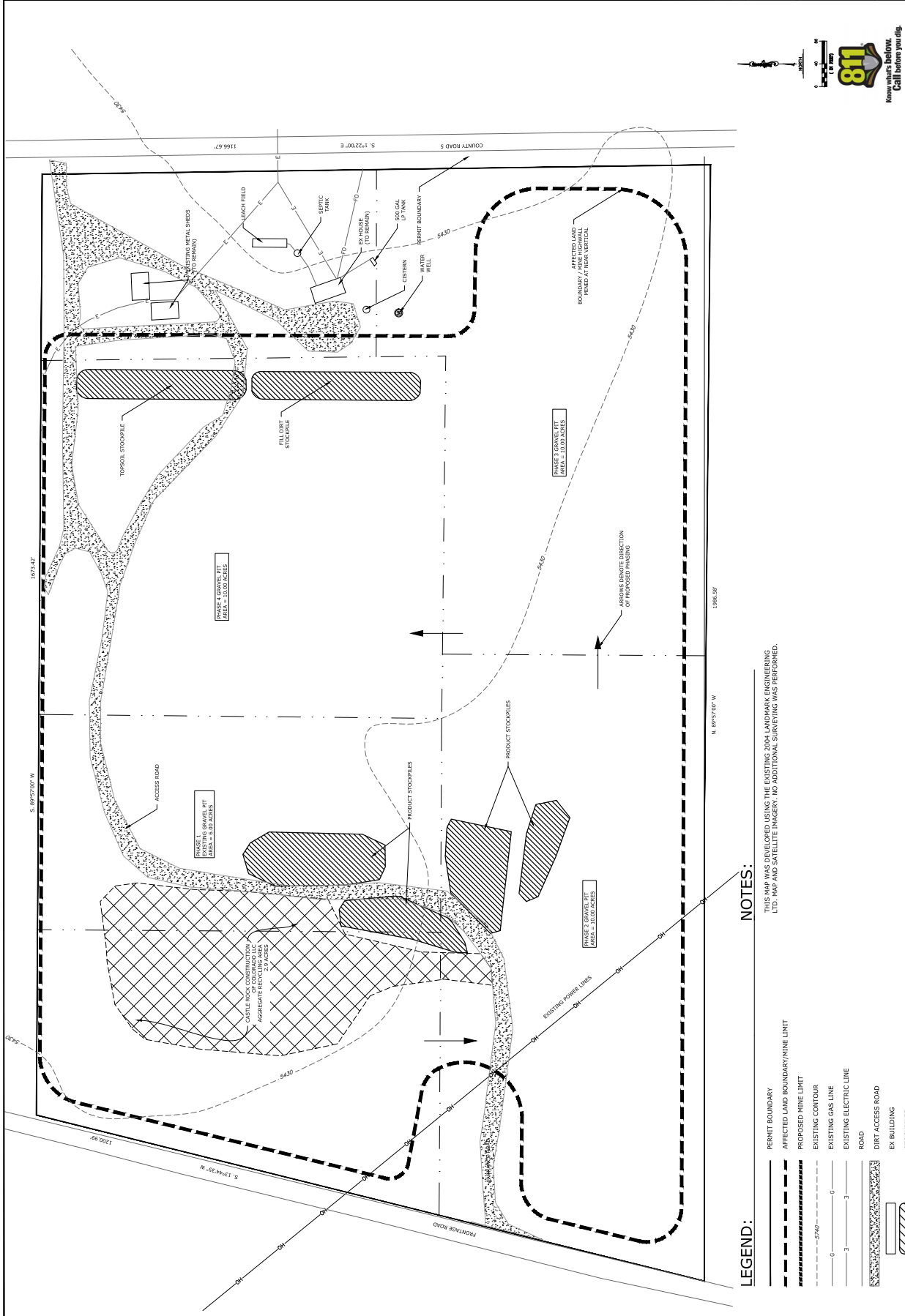
GLACIER ROCK GRAVEL COMPANY
SPECIAL USE PERMIT #01-21396
LARIMER COUNTY, COLORADO

| NO. | DESCRIPTION | DATE |
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| DESIGNED BY: | ASE | DATE: | 2/22/2025 |
| CHECKED BY: | ASE | DATE: | 2/22/2025 |
| DATE: | 2/22/2025 | PROJECT NO.: | 2025-001-01 |
| PROJECT NAME: | GLACIER ROCK GRAVEL COMPANY | | |

MINE PLAN
MAP

EXHIBIT C



NOTES:

THIS MAP WAS DEVELOPED USING THE EXISTING 2004 LANDMARK ENGINEERING LTD. MAP AND SATELLITE IMAGERY. NO ADDITIONAL SURVEYING WAS PERFORMED.

LEGEND:

- PERMIT BOUNDARY
- AFFECTED LAND BOUNDARY/MINE LIMIT
- PROPOSED MINE LIMIT
- EXISTING CONTOUR
- EXISTING GAS LINE
- EXISTING ELECTRIC LINE
- ROAD
- DIRT ACCESS ROAD
- EX BUILDING
- STOCKPILES