




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: Crawford Properties	MINE/PROSPECTING ID#: File No. M-2025-001	MINERAL: Not Specified	COUNTY: Larimer
INSPECTION TYPE: Illegal(Unpermitted Operation)	WEATHER: Cloudy	INSP. DATE: February 4, 2025	INSP. TIME: 10:00
OPERATOR: Crawford Properties, LLC	OPERATOR REPRESENTATIVE: Robert Hubbell	TYPE OF OPERATION: ILL - Illegal	
REASON FOR INSPECTION: Citizen Complaint	BOND CALCULATION TYPE:	BOND AMOUNT: N/A	
DATE OF COMPLAINT: NA	POST INSP. CONTACTS: None	JOINT INSP. AGENCY: None	
INSPECTOR(S): Joel Renfro Ursula Armstrong	INSPECTOR'S SIGNATURE: 	SIGNATURE DATE: February 28, 2025	

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

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

OBSERVATIONS

This inspection was conducted by Joel Renfro and Ursula Armstrong with the Division of Reclamation, Mining and Safety (Division/DRMS) on February 4, 2025. This inspection was in response to an illegal mining complaint received on January 13, 2025. The complaint is targeted towards activity occurring on land owned by Crawford Properties, LLC. Robert Hubbell was present during the inspection and represented Crawford Properties, LLC. **Photos 1-15** are included with this report.

This site is located in El Jebel, CO in Eagle County just north of Hwy 82. The specific location of the complaint is within Eagle County parcel numbers 2391-344-12-002 and 2391-343-18-001, both owned by Crawford Properties, LLC. Either parcel can be accessed from JW Drive, with the location of the material stockpile accessed south from the road and the material processing facility located to the north.

The complaint detailed the movement of construction materials from a southern parcel of land via haul truck. This haul truck was reportedly crossing a bike path and JW Drive (a public road) to a northern parcel of land, then to a facility where the material is being processed. The complainant expressed concerns for the structural integrity of the bike path and JW Drive along with concern of no signage or notice of equipment crossing the roadway. This ultimately resulted in a complaint submitted to the Division about a possible illegal mining operation conducting activity without a reclamation permit.

Material is stockpiled on a parcel to the south, just west of the mobile homes. This material is mostly incidental cobble generated from the construction of the mobile home community. This cobble material was then moved from the southern parcel, across JW Drive to a northern parcel also owned by Crawford Properties. At the time of the inspection, there was a pile of woodchips owned by Eagle Crest Nursery which lies directly east of the parcel. There was also a pile of large cobble generated from the construction activities that will be used in conservation activity by the Aspen Valley Land Trust. It is important to note that the Division did not observe any open pits or highwalls that suggested mining activity in this parcel.

A parcel owned by the school district is crossed to access their property, but it appears Crawford has a deal with them to cross the school district property. In that northern parcel, there are several other stockpiles of various materials that Crawford Properties uses to maintain their property. There is also a storage building and an office on this site. Two crushers were observed in the northwest corner of the site along with other construction equipment throughout the site, including skid steers, a mid-sized excavator, a loader, and some work trucks. A haul truck was mentioned in the complaint, which the Division did not see during the inspection. Mr. Hubbell explained that they rented a haul truck to move the material across the parcels and have since returned it. The initial complaint also mentioned a wash plant in the northern parcel. When looking back into aerial imagery, it appears that there may have been a pond present around 2015, but it had clearly since been filled in and there is no evidence of impounded water on site anymore.

Based on observations during the inspection and retellings of the activity by Mr. Hubbell and Eagle County Road and Bridge, the Division was able to confirm that a mobile home community on land owned by Crawford Properties had been developed sometime within the past 10 years. As a result, incidental material was produced and was either used on-site or stored directly west of this community development. The remaining material was stockpiled on-site until sometime within the past 3 months when Crawford Properties started to move it to their facility directly north to further process some of this material to be used in the maintenance of their properties in El Jebel.

The material in concern is incidental material generated from a construction project. Furthermore, no open pit or

high walls suggest any sort of mining operation generating construction materials was found during the inspection. The material ultimately is not being introduced into the market through selling, bartering, or trading, but is remaining on Crawford Properties for the usage of property maintenance. Additionally, the Division was able to confirm with Eagle County officials that although material was crossing a County Road, the County was aware of and approved of this use of their roads. Due to the reasons listed above, the Division has determined that this is *not* a mining operation and will not require a reclamation permit with the state.

If the nature of the project described in this report were to change, the Division recommends the landowner complete and submit to our office an Is it Mining questionnaire (form enclosed) to receive a formal determination from the Division on whether the proposed activities will require a reclamation permit.

This concludes the report.

Any questions or comments regarding this inspection report should be forwarded to Joel Renfro at the Colorado Division of Reclamation, Mining, and Safety, 1313 Sherman Street, Room 215, Denver, CO 80203, via telephone at (720) 812-2002, or email at joel.renfro@state.co.us.

PHOTOGRAPHS



Figure 1. Material stockpiles within the southern parcel, looking north.



Figure 2. Cobble stockpile within the southern parcel, looking north.



Figure 3. Dirt road leading out of the southern parcel to JW Drive, looking south.



Figure 4. Bike path leading to a neighboring community, looking west.



Figure 5. Bike path leading out of the neighboring community, looking east.



Figure 6. Portion of JW Drive where the haul truck crossed the street, looking north.



Figure 7. Continuation of the dirt road across JW Drive, looking north.



Figure 8. In northern parcel, looking south at the cobble stockpiles.



Figure 9. In northern parcel, looking south at recycled concrete and asphalt piles.



Figure 10. Machinery within the northern parcel, looking south.



Figure 11. In northern parcel, looking west at the onsite crushers



Figure 12. In northern parcel, looking east at Crawford Properties workshop.



Figure 13. Interior of a storage building within the northern parcel.



Figure 14. A road maintained with the material within the mobile home community east of El Jebel Road, looking south.



Figure 15. An overview of the Crawford Properties, looking south.

Inspection Contact Address

Robert Hubbell
Robert@eljebel.co

Enclosure:

DRMS Complaint from January 13, 2025
Is It Mining Questionnaire
Google Earth image of the site

CC:

Ursula Armstrong, DRMS
Amy Eschberger, DRMS

DRMS Complaint Intake Tool

By Submitting this form you are requesting an investigation of compliance with DRMS rules.



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

DRMS Internal Information

Select Permit Type *

Minerals

Permit No List *

M2025001

Date of Complaint

01/13/2025

COMPLAINANT INFORMATION

*** Indicates a Required Field**

Do you wish to remain anonymous? *

☐ Yes ☒ No

Connection to Incident *

Select all that apply

- ☐ Land Owner
☒ Nearby Resident
☐ Other

- ☐ Mineral Owner
☐ Observed Incident

DESCRIPTION OF COMPLAINT

(Please be as specific as possible)

Note: Please provide as much detail related to location and issue as possible. Without enough detail, DRMS will not be able to process or investigate the complaint and, therefore, DRMS will have no choice but to discard the complaint.

Location of Concern *

Please provide as much detail as possible. It is important to narrow down the location. If available, please include Township, Range and Section, physical address, or GPS location. You may also upload a pdf map below.

Concerned for unpermitted construction material mining operation taking place on Eagle County parcel number 2391-344-12-002 and 2391-343-18-001, both owned by Crawford Properties LLC. They are currently using a off road six wheel mining truck to haul material over a bike path and JW Drive, a public road which Eagle County owns and maintains, to their wash plant. Their is no signage warning about equipment entering the roadway, and the road and path way are already being damaged from the equipment.

Incident County *

Eagle County

Is this an ongoing issue(s)?

☒ Yes ☐ No

Nature of Complaint *

Select all that apply

- | | |
|---|---|
| <input checked="" type="checkbox"/> Illegal Mining | <input type="checkbox"/> Dust |
| <input type="checkbox"/> Ground Water / Water Well Impact | <input type="checkbox"/> Acid or Toxic Materials/Spills |
| <input type="checkbox"/> Surface Water Impact / Stormwater Management | <input checked="" type="checkbox"/> Property Damage |
| <input type="checkbox"/> Mine Plan Compliance | <input type="checkbox"/> Waste Management / Dumping |
| <input checked="" type="checkbox"/> Signs and Markers | <input type="checkbox"/> Overburden / Development Waste |
| <input type="checkbox"/> Financial Warranty | <input type="checkbox"/> Backfilling and Grading |
| <input type="checkbox"/> Processing Waste / Tailings | <input type="checkbox"/> Processing Facilities |
| <input type="checkbox"/> Fish / Wildlife | <input type="checkbox"/> Erosion / Sedimentation |
| <input checked="" type="checkbox"/> Off-Site Damage | <input checked="" type="checkbox"/> Roads |
| <input type="checkbox"/> Explosives / Blasting | <input type="checkbox"/> Topsoil |
| <input type="checkbox"/> Revegetation | <input type="checkbox"/> Weeds |
| <input type="checkbox"/> Reclamation Plan Compliance | <input type="checkbox"/> Other <input type="text"/> |

Detailed description of the issue(s) * (?)

Please provide as much detail as possible. It is important to narrow down the issue(s).

They are currently using a off road six wheel mining truck to haul material over a bike path and JW Drive, a public road which Eagle County owns and maintains, to their wash plant. Their is no signage warning about equipment entering the roadway, and the road and path way are already being damaged from the equipment.

Have you contacted the operator or party conducting the operation? If yes, please provide details. *

☐ Yes ☒ No

If known, please provide the name of the operator or party conducting the operation.

Crawford Properties LL

If known, please provide the Permit or NOI Number (ie M-1970-111 or P-1970-111).

Must be entered in the following format: M1970111 or P1970111 (No dashes allowed)

Have you contacted any other agencies or local governments related to this issue or issues? If so, please provide details. *

☐ Yes ☒ No

ADDITIONAL INFORMATION**Are there supporting photos, maps, or documents you wish to upload? ***

☐ Yes ☒ No

What is your preferred method for DRMS to communicate with you throughout the investigation? *



Select all that apply

☐ Phone ☒ E-mail ☐ US Mail

Complaint Site

Image from September, 2023

Legend

-  Eagle Crest Nursery
-  Roaring Fork School District, RE-1 El Jebel

Google Earth

Image © 2025 Airbus (82)

800 ft





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

Date: _____

RE: Need for State Reclamation Permit: "Is It Mining?"

Name: _____

Street Address: _____

Telephone: () _____ **Mobile:** () _____

Email Address: _____

Enclosed are pertinent sections of the Colorado Mined Land Reclamation Board (Board) Rules governing activities that do not require a reclamation permit. To determine if you need a permit for your proposed activity, first check Rule 1.2 which describes activities the Board has determined do not require state reclamation permits. If you find a match, you can proceed based on your interpretation of the rule, but at your own risk. If you are uncertain how the Rule may apply to your activity, you should answer the list of questions below with as much detail as possible. Please feel free to use additional paper, maps, and attachments to explain your project.

Please include in your determination request answers to the following questions:

1. Please provide the legal location of the proposed project and submit a site map that clearly delineates the location of the proposed extraction site and the location of the nearest city, town, and county location name.

Section: _____ **Township:** _____ **Range:** _____ **PM** _____

Or NAD 27 X UTM Y UTM
GPS _____

Direction and Miles to nearest town/city: _____ **County:** _____



2. Is the site of material extraction on public or privately owned property?

Public

☐

Private

☐

3. What type(s) of material or metal is/are proposed to be extracted and describe the physical nature of the site i.e., river terrace, rocky knob, in-stream gravel deposit, etc.?

4. What processing or extraction method(s) will be used on site? Include any equipment or chemical(s) that will be used in the processing and extraction of the materials.

5. Will the extracted material be hauled offsite or used on the same parcel of property where the material is extracted?

6. How will the extracted material be used on site?

7. If the material is hauled offsite, where will it be hauled to and what is the intended use?

8. What is the approximate areal extent of the proposed extraction in acres?

9. To what approximate depth will the extraction extend?

10. In cubic yards, approximately how much material will be removed:

11. Will material extraction involve the use of explosives?

Yes ☐ No ☐

12. Will site of extraction result in the exposure of tributary ground water?

Yes ☐ No ☐

13. Will either the landowner or the mine site operator receive any type of compensation, i.e., monetary, in-kind, haulage fees, etc., from the proposed material extraction?

Yes ☐ No ☐

14. Please supply a copy of any documents that will ensure that the area of extraction will be reclaimed to some beneficial land use once extraction activities have been completed.

15. Do you have permits for this activity from any other governmental agencies such as building, construction, or grading permits, and if so, what are they?

16. Are there state/federal/local agency participants in terms of funding?

Funding	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Design	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Percentages

State _____ Federal _____ Local Agency _____

17. What post mining land uses will be made of the extraction and why? (This question helps us determine the intent of the activity.)

18. What types and sizes of equipment will be used in the extraction?

Please send the completed questionnaire and any supporting materials to the Division at the address below for review.

Colorado Division of Reclamation, Mining and Safety
1313 Sherman St Rm 215
Denver CO 80203

If you prefer, you may email the completed questionnaire and supporting materials to drms_info@state.co.us.

The Board has directed the Division to make a decision based on the information you have supplied. We trust that the activities will be performed as represented. If we receive a complaint, we are required by law to conduct an inspection of the site. Which could result in a violation, a cease and desist order, and other corrective actions including submittal of a permit application.

If you have any questions, please contact the Division at (303)866-3567. Please feel free to visit our web site at: drms.colorado.gov for further access to the full Act and

Rules governing extraction of metals, non-metals, and construction materials in the State of Colorado.

Sincerely,

Division of Reclamation, Mining and Safety Staff

Enclosure: Rule 1.2 excerpt for Hard Rock Metal Mines and Construction Materials

Rule 1.2 excerpt for Hard Rock/Metal Mining

1.2 SCOPE OF RULE AND ACTIVITIES THAT DO NOT REQUIRE A RECLAMATION PERMIT

1.2.1 Specified by Rule

The Board has determined that certain types of activities do not need reclamation permits either because the excavated substance is not a mineral as defined in Section 34-32-103(7), Colorado Revised Statutes 1984, as amended or because the activity is not a mining operation as defined by Section 34-32-103(8), C.R.S. 1984, as amended. Such activities include the following:

- (a) the exploration and extraction of natural petroleum in a liquid or gaseous state by means of wells or pipe;
- (b) the development or extraction of coal (refer to the Colorado Surface Coal Mining Reclamation Act Section 34-33-101, et seq., C.R.S. 1984, as amended);
- (c) smelting, refining, cleaning, preparation, transportation, and other off-site operations not conducted on affected land; and
- (d) the extraction of geothermal or groundwater resources.

1.2 ACTIVITIES THAT DO NOT REQUIRE A RECLAMATION PERMIT

103(3) and
(13)

1.2.1 Specified by Rule

The Board has determined that certain types of activities do not need reclamation permits either because the excavated substance is not a construction material as defined in Section 34-32.5-103(3), Colorado Revised Statutes 1984, as amended or because the activity is not a mining operation as defined by Section 34-32.5-103(13), C.R.S. 1984, as amended. Such activities include the following:

- (a) the exploration and extraction of natural petroleum in a liquid or gaseous state by means of wells or pipe:
- (b) the development or extraction of coal (refer to the Colorado Surface Coal Mining Reclamation Act Section 34-33-101, et seq., C.R.S. 1984, as amended);
- (c) cleaning, preparation, transportation, and other off-site operations not conducted on permitted land: and
- (d) the extraction of geothermal or groundwater resources.

1.2.2 Reserved

1.2.3 Reserved

1.2.4 Extraction or Exploration on Federal Lands

Any person who Intends to extract or explore for construction materials on federal lands shall apply for a Mined Land Reclamation Board permit or submit a Notice of Intent to conduct exploration operations unless specifically exempted by the Board according to the provisions of this Subsection 1.2.