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

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: Irwin/Thomas Mine	**MINE/PROSPECTING ID#:** M-2016-054	**MINERAL:** Sand and gravel	**COUNTY:** Boulder
INSPECTION TYPE: Monitoring	**WEATHER:** Clear	**INSP. DATE:** March 12, 2025	**INSP. TIME:** 10:00
OPERATOR: Holcim - WCR, Inc.	**OPERATOR REPRESENTATIVE:** Wyatt Webster, Chris Zadel, Dominick Sobotka	**TYPE OF OPERATION:** 112c - Construction Regular Operation	
REASON FOR INSPECTION: Normal I&E Program	**BOND CALCULATION TYPE:** Partial Bond	**BOND AMOUNT:** $8,260,499.00	
DATE OF COMPLAINT: NA	**POST INSP. CONTACTS:** None	**JOINT INSP. AGENCY:** None	
INSPECTOR(S): Patrick Lennberg	**INSPECTOR'S SIGNATURE:** 	**SIGNATURE DATE:** March 20, 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---------- Y	(FN) FINANCIAL WARRANTY-------- Y	(RD) ROADS---------- N
(HB) HYDROLOGIC BALANCE---------- Y	(BG) BACKFILL & GRADING---------- Y	(EX) EXPLOSIVES--------- N
(PW) PROCESSING WASTE/TAILING---- N	(SF) PROCESSING FACILITIES------- N	(TS) TOPSOIL---------- Y
(MP) GENL MINE PLAN COMPLIANCE- Y	(FW) FISH & WILDLIFE---------- N	(RV) REVEGETATION---- Y
(SM) SIGNS AND MARKERS---------- Y	(SP) STORM WATER MGT PLAN---- N	(RS) RECL PLAN/COMP-- Y
(ES) OVERBURDEN/DEV. WASTE--------- N	(SC) EROSION/SEDIMENTATION--- N	(ST) STIPULATIONS------- Y
(AT) ACID OR TOXIC MATERIALS------- N	(OD) OFF-SITE DAMAGE----------N	

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

OBSERVATIONS

The Irwin/Thomas Mine (M2016-054) was inspected by Patrick Lennberg with the Division of Reclamation, Mining, and Safety (Division/DRMS). The inspection was completed as part of the Division's routine monitoring program. The site was last inspected by the Division on May 24, 2023, as part of an Acreage Release Request No. 2. Wyatt Webster and Dominick Sobotka representing the Operator, Holcim – WCR, Inc., and Chris Zadel representing the mining company, NCCI, Inc, were present during the inspection.

The Irwin/Thomas Mine is located in Boulder County at the southeastern edge of Longmont, Colorado and is accessed from the northeast off N 119th Street. The site is situated near the confluence of Left Hand Creek and St. Vrain Creek. The approved post-mining land use is agriculture. A mine sign was posted at the primary mine entrance pursuant to Rule 3.1.12.

The site was active at the time of inspection. All mining activities are confined to MA-1. Mining at the site is being conducted by NCCI, Inc on behalf of Holcim – WCR, Inc. Cell 1A has been mined, reclaimed, and has been revegetated with the approved enhanced riparian area plants and seed mixture. Mining was occurring in Cell 3 and last of the material was being removed from Cell 2. The slurry wall has been installed around Cells 2 and 3. The slurry wall has not passed its 90-day leak test per the SEO requirements; however, Holcim has received an interim letter notifying them that it was going to pass. The underdrain has been installed and has the capability to discharge in an area northeast of Cell 1A. Cell 1 has been mined and was being backfilled at the time of inspection. Mined material is transported by truck to be processed at the Operators Longmont Distil permit, M1989-029.

Cells 4 and 5 are in the process of being prepared for mining. During the inspection the Operator noted that they will be submitting a Technical Revision to mine the material that separates the Cells. It was discussed that there may be additional bonding implications with additional material needed to backfill the area between those Cells that was not considered during TR1.

The outfall of the underdrain was observed just northeast of Cell 1A. At the time of inspection the underdrain had a plug in it to prevent discharge. The plug was in place because a concrete riser was needed to add to the manhole to promote gravity flow to an adjacent culvert that conveys water to St Vrain Creek. The Division stated that with runoff occurring soon that getting that manhole riser installed should be a priority to ensure groundwater does not mound unnecessarily.

The Division evaluated the financial warranty and determined the currently held bond amount is adequate at this time with the understanding that the bond will be reviewed again with the next Technical Revision.

Photographs taken during the inspection are attached.

Please contact Patrick Lennberg by email at patrick.lennberg@state.co.us if you have any questions regarding this report.

Inspection Contact Address
Wyatt Webster
Holcim - WCR, Inc.

1687 Cole Blvd., Suite 300
Golden, CO 80401

cc: Jared Ebert, DRMS

ec: Wyatt Webster, Holcim – WCR, Inc., wyatt.webster@holcim.com

PHOTOGRAPHS

Photo 1: Mine sign at primary mine entrance, 1 of 2

Photo 2: Mine sign at primary mine entrance, 2 of 2

Photo 3: Removing the access ramp to Cell 2, the minimal amount of water is due to slurry wall

Photo 4: Graded side slopes of Cell 2

Photo 5: Active mining in Cell 3

Photo 6: Backfilled portions of Cell 1, looking west

Photo 7: Backfilling southern portion of Cell 1, looking south

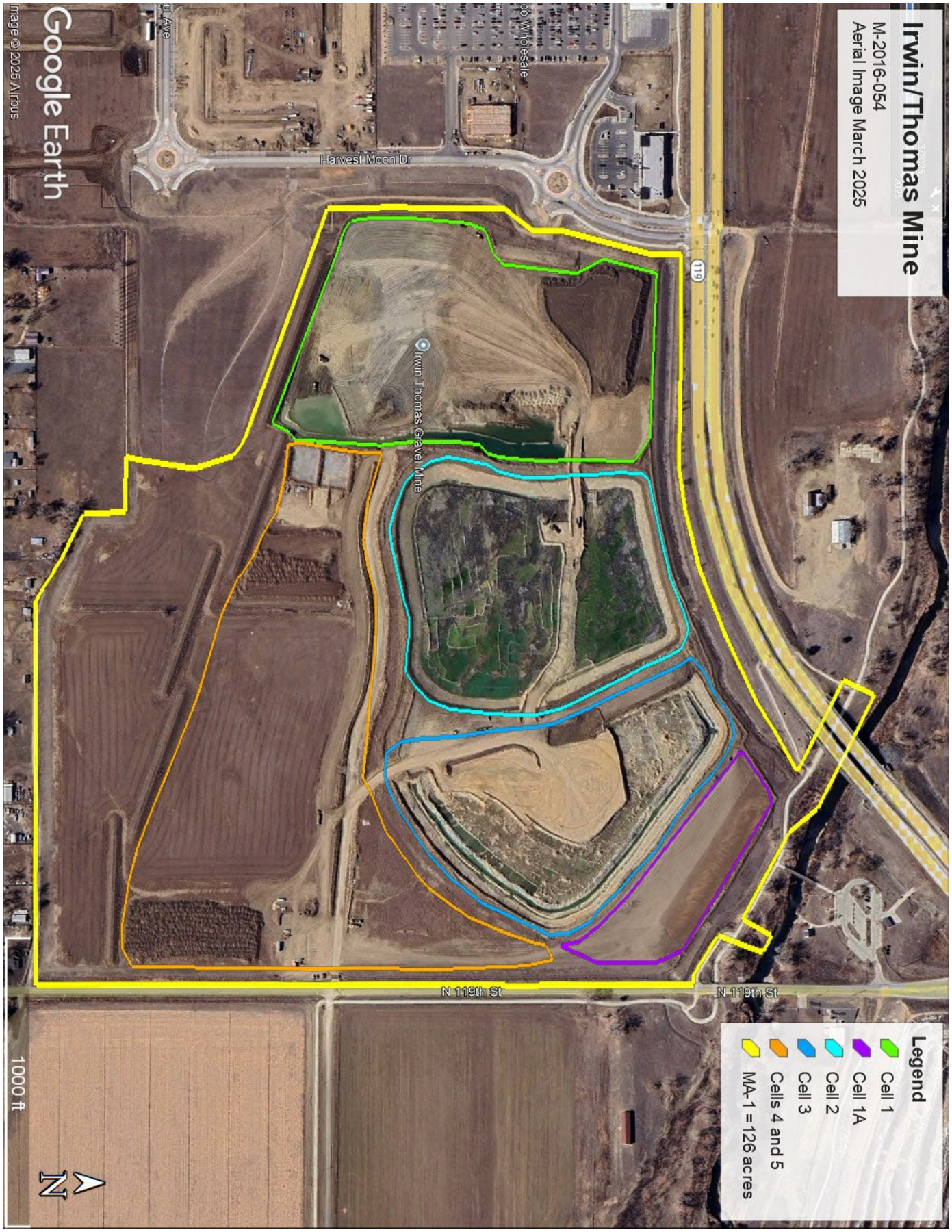
Photo 8: Looking east across Cells 4 and 5

Photo 9: Reclaimed and reseeded Cell 1A, seeded and planted with enhanced riparian vegetation

Photo 10: Reclaimed Cell 1A, looking west towards Cell 3

Photo 11: Looking south along the axis of the underdrain and portion of Cell 5

Photo 12: Underdrain outfall location adjacent to the culvert that drains under bikepath to creek


Irwin/Thomas Mine
M-2016-054
Aerial Image March 2025
Google Earth
Image © 2025 Airbus
Harvest Moon Dr
Irwin Thomas Gravel Mine
119
N 119th St
N 119th St
1000 ft
N
Legend
Cell 1
Cell 1A
Cell 2
Cell 3
Cells 4 and 5
MA-1 = 126 acres