



STATE OF
COLORADO

Girardi - DNR, Chris <chris.girardi@state.co.us>

Re: Farmers Sand/Milton Reservoir M2024057- Pre-Operational Inspection Report

Girardi - DNR, Chris <chris.girardi@state.co.us>

Thu, Apr 10, 2025 at 9:21 AM

To: Scott Edgar <Scott@farmersres.com>

Cc: Jared Ebert - DNR <jared.ebert@state.co.us>, Shelly Hoover <Rochelle@erccolorado.net>, Lisa Shea <Lisa@erccolorado.net>, Troy Thompson <Troy@erccolorado.net>

Good morning Scott,

Attached is the revised inspection report. Please let me know if you have any questions or concerns.

Thanks,

Chris Girardi

Environmental Protection Specialist Intern



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

P: (720) 793-3041

Physical: 1313 Sherman Street, Room 215, Denver, CO 80203

Mailing: DRMS Room 215, 1001 E 62nd Ave, Denver, CO 80216

chris.girardi@state.us.co | <https://drms.colorado.gov/>

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FarmersSand_RevisedPreOpInspectionReport_M2024057.pdf
2947K



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: Farmers Sand/Milton Reservoir	MINE/PROSPECTING ID#: M-2024-057	MINERAL: Sand	COUNTY: Weld
INSPECTION TYPE: Pre-operation Inspection	WEATHER: Clear	INSP. DATE: March 24, 2025	INSP. TIME: 09:00am
OPERATOR: The Farmers Reservoir and Irrigation Company	OPERATOR REPRESENTATIVE: Scott Edgar	TYPE OF OPERATION: 112c - Construction Regular Operation	
REASON FOR INSPECTION: Normal I&E Program	BOND CALCULATION TYPE: NA	BOND AMOUNT: Under review	
DATE OF COMPLAINT: NA	POST INSP. CONTACTS: None	JOINT INSP. AGENCY: None	
INSPECTOR(S): Chris Girardi Jared Ebert	INSPECTOR'S SIGNATURE: 	SIGNATURE DATE: April 10, 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>Y</u>	(FN) FINANCIAL WARRANTY----- <u>N</u>	(RD) ROADS----- <u>Y</u>
(HB) HYDROLOGIC BALANCE----- <u>Y</u>	(BG) BACKFILL & GRADING----- <u>N</u>	(EX) EXPLOSIVES----- <u>N</u>
(PW) PROCESSING WASTE/TAILING---- <u>Y</u>	(SF) PROCESSING FACILITIES----- <u>N</u>	(TS) TOPSOIL----- <u>N</u>
(MP) GENL MINE PLAN COMPLIANCE- <u>Y</u>	(FW) FISH & WILDLIFE----- <u>Y</u>	(RV) REVEGETATION---- <u>N</u>
(SM) SIGNS AND MARKERS----- <u>Y</u>	(SP) STORM WATER MGT PLAN---- <u>Y</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>Y</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

On March 24, 2025, Chris Girardi (I) and Jared Ebert with the Colorado Division of Reclamation, Mining, and Safety ("DRMS" or "Division") conducted a pre-operational inspection of the Farmers Sand/Milton Reservoir reclamation permit application. The applicant, The Farmers Reservoir & Irrigation Company ("FRICO") was present for the inspection and represented by Scott Edgar. Shelly Hoover and Lisa Shea with Ecological Resource Consultants, LLC ("ERC") were also present during the inspection. The weather was clear and sunny.

The 112(c) reclamation permit application was received by the Division on November 12, 2024, and deemed complete on December 16, 2024. The Division issued a Preliminary Adequacy Review of the application to FRICO on February 4, 2025. The Division also deemed the application "Complex", as defined by Rule 1.1(12) on February 6, 2025.

The permit application is for a construction materials mining operation using a dredge to mine sediments located at the bottom of Milton Reservoir. The initial purpose of the dredging operation was to remove sediment from the base of Milton Reservoir to increase the water storage capacity of the reservoir. However, after dredging, FRICO determined that the dredged material could be a salable commodity.

The site is located approximately 9 miles southeast of LaSalle, Colorado. Notice signs (see Photos 1-5) were observed during the inspection as required by Rule 1.6.2(b). Access points to the permit area are located to the southwest, northwest, north, east, and south of the permit area. The Division met with FRICO and ERC at 9:00am at the primary mine entrance, located to the southwest of Milton Reservoir off County Road 32. The inspection started at the southwest side of the proposed affected area, which contains the West Stockpile and Stockpile 1. Both stockpiles are located along the haul road. The West Stockpile was estimated to be approximately six (6) to eight (8) feet in height, contained minor amounts of vegetation along the south end, and more recently placed sediment on the north end (see Photo 7). Stockpile 1 is significantly larger, ranging from twenty (20) to forty (40) feet in height with steep side slopes (see Photos 8-9). A grader was working on the northern end of Stockpile 1. According to FRICO, they intend to use a hydromulcher and water trucks for dust suppression. Water trucks were observed in operation at the time of the inspection. According to FRICO, salable material will be first drawn from Stockpile 1, then the North Stockpile, and the West Stockpile last. The proposed primary haul road runs parallel to Milton Reservoir on the west side (see Photo 6). The Division mentioned that additional discussions between FRICO, the Division, and Colorado Parks and Wildlife (CPW) need to be held regarding the location of the proposed future sand processing plant under consideration to be located along the southwest portion of the Milton Reservoir and the Stockpile 1 location (see Photo 9).

Located to the north of Stockpile 1 and the West Stockpile adjacent to Milton Reservoir are the In-Res Settling Ponds, which were the initial settling ponds before subsequent settling ponds were constructed to account for the increased amount of dredged material. These settling ponds are separated by low embankments and allow dewatering of the material from the base of the ponds through interconnected pipes. The Division was able to drive along the embankments (see Photos 10-11). All the settling ponds had gentle side slope configurations graded at a 3:1 horizontal to vertical ratio or less and were filled with water. The dredged material is still being excavated from the ponds. Four haul trucks and one excavator were active at the time of the inspection. Several species of birds were observed along the embankments, including pelicans and eagles (see Photo 12).

After the material is dredged from the bottom of Milton Reservoir, the material is pumped the equalizing tank, then pumped to the cyclone. The overflow from the cyclone is then delivered via a pipeline to the settling ponds where any fine-grained material will settle in the before the water is diverted back to Milton Reservoir. The settling ponds are connected via overflow spillways (see Photo 15). After the material is dewatered in the settling ponds, the sand is excavated and transported to the stockpiles. At the time of the inspection, all four settling ponds did not contain water. In addition, the side slopes of the ponds exhibited 3:1 configuration, the side slopes had been hydro-mulched. According to the Applicant, the side slopes and embankments (see Photos 13-15) had also been seeded as dust and erosion control measures.

At the time of the inspection, the dredge was not operational and was located along the northern shoreline of Milton Reservoir where the Platte Valley Canal discharges to the reservoir. FRICO intends to resume dredging in March, however they are awaiting the installation of liners along several embankments before they can resume dredging operations. The Cyclone was inactive at the time of the inspection and was currently undergoing maintenance (see Photo 16). A laydown area was located along this shoreline and contained various equipment, including an excavator, a water holding tank, and fuel storage tanks (see Photo 17). No problems were observed in the laydown area.

Another stockpile, the N1 Stockpile, is located north of the Milton Reservoir and nestled between where the Platte Valley Canal enters Milton Reservoir and to the west of the Evans #2 Ditch. Dewatering of the N1 Stockpile was carried out through historic stormwater catchment basins that were converted into small settling ponds that then decanted into the Evans #2 Ditch, which is owned and operated by Platte Valley Irrigation Company. The Evans #2 Ditch eventually discharges to Lake Christina and the Gillmore Ditch to the southeast. Lake Christina is owned by the Beebe Draw Farms Authority and generally used for fishing and other recreational activities. According to Mr. Edgar, Lake Christina has been receiving flows from the Evans #2 ditch for many years. Based on aerial photos dated from 1999 to 2024, there is a notable sediment plume that has existed in this location during that timeframe (see Figure 1 below). It does appear that some sediment from the dredging operation was discharged into the Evans #2 ditch and subsequently discharged into Lake Christina. During the public comment period for the application, the Division received several objections regarding the discharge of material from FRICO's dredging operation into Lake Christina. These objections generally characterized the discharged material as "sludge" and/or "mining waste". According to FRICO, the Beebe Draw Farms Authority came to an agreement with FRICO wherein FRICO will excavate and remove the material that has been discharged into Lake Christina from the Evans #2 Ditch. According to the FRICO, approximately two (2) inches of sediment was discharged into Lake Christina from the more recent dredging operation. That material and additional sediment was being removed by FRICO at the time of the inspection.

The Division observed Lake Christina from the south end, as the north and south portions of the lake are separated by an earthen berm (see Photo 19). The sediment material being removed from Lake Christina by FRICO is being transported to an area adjacent to the east side of the Platte Valley Canal. Upon observation, the excavated material appeared to predominantly be a clayey sand. The material was mostly brown and with minor amounts of dark grey, was dry, and exhibited no hydrocarbon staining or distinguishable odor (see Photo 18). Minor amounts of mulch was intermixed with the material. According to the Operator, the excavated material will not be sold and will remain onsite where the area will be reclaimed via grading and reseeded. FRICO has a discharge permit for the dredging operations. The Division has been in communication with the Colorado Department of Public Health and Environmental (CDPHE) and they are aware of the situation and will be conducting their own inspection.

The current decision due date for the application is May 15, 2025. The public comment period closed on March 7, 2025. The application is currently in the Adequacy Review phase, as FRICO is preparing a response to the Preliminary Adequacy Review Letter issued by the Division on February 4, 2025.

Photographs taken during the inspection are attached. If you need additional information or have any questions, please contact me at the Division of Reclamation, Mining, and Safety, 1313 Sherman Street, Room 215, Denver, CO 80203 or by telephone at (720) 793-3041, or by email at chris.girardi@state.co.us.

PHOTOGRAPHS



Photo 1: Mine entrance notice sign at the gate located adjacent to the northeast of County Road 32/Cavanaugh Road on the southwest side of Milton Reservoir.



Photo 2: Mine entrance notice sign at the gate located on an access road approximately 0.37 miles to the north of County Road 30 to the south of Milton Reservoir.



Photo 3: Mine entrance notice sign at the gate located on an access road approximately 0.13 miles to the west of County Road 47 to the east of Milton Reservoir.

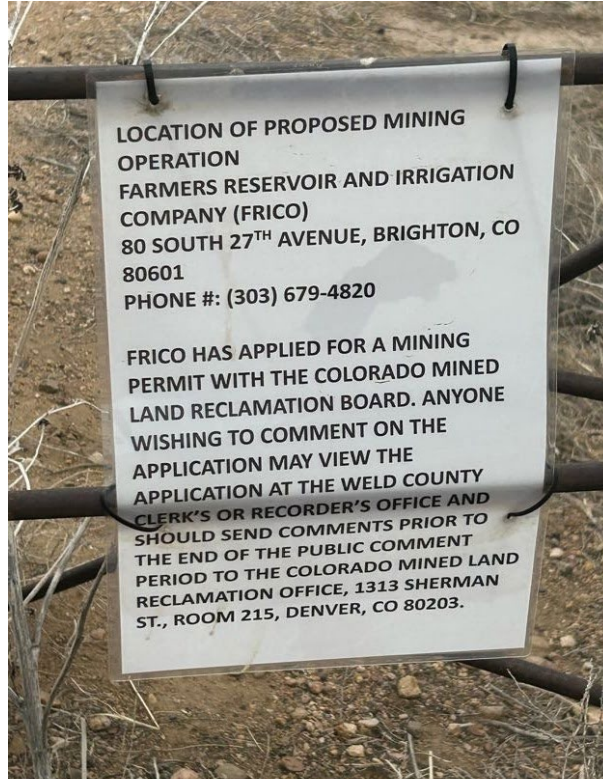


Photo 4: Mine entrance notice sign at the gate located on an access road approximately 0.13 miles to the west of County Road 47 to the east of Milton Reservoir.



Photo 5: Mine entrance notice sign at the gate located on Beebe Draw Farms Parkway to the northeast of Milton Reservoir and adjacent to the Platte Valley Canal.



Photo 6: View of haul road that runs parallel to Milton Reservoir, facing southwest.



Photo 7: View of the West Stockpile, facing northwest.



Photo 8: View of Stockpile 1 and the adjacent land to the south, facing north.



Photo 9: View of Stockpile 1, facing north.



Photo 10: View of an In-Res Settling Pond and a water truck, facing north.



Photo 11: View of In-Res Settling Pond and haul trucks, facing east.



Photo 12: Eagle located within the In-Res Settling Ponds area, facing south.



Photo 13: View of the North Settling Pond 2, pond side slopes, seeded embankment, facing west.



Photo 14: View of seeded embankment between North Settling Ponds 2 and 3A, facing northeast.



Photo 15: Overflow spillway pipes connecting North Settling Pond 4 and Milton Reservoir, facing north.



Photo 16: View of Cyclone in the North Fill Area near the N1 Stockpile, facing north.



Photo 17: View of the Laydown Area, including the Water Holding Tank and fuel storage tank facing south towards Milton Reservoir.



Photo 18: View of the discharged material from the Evans #2 Ditch into Lake Christina that has been transported north of Milton Reservoir along the Platte Valley Canal.

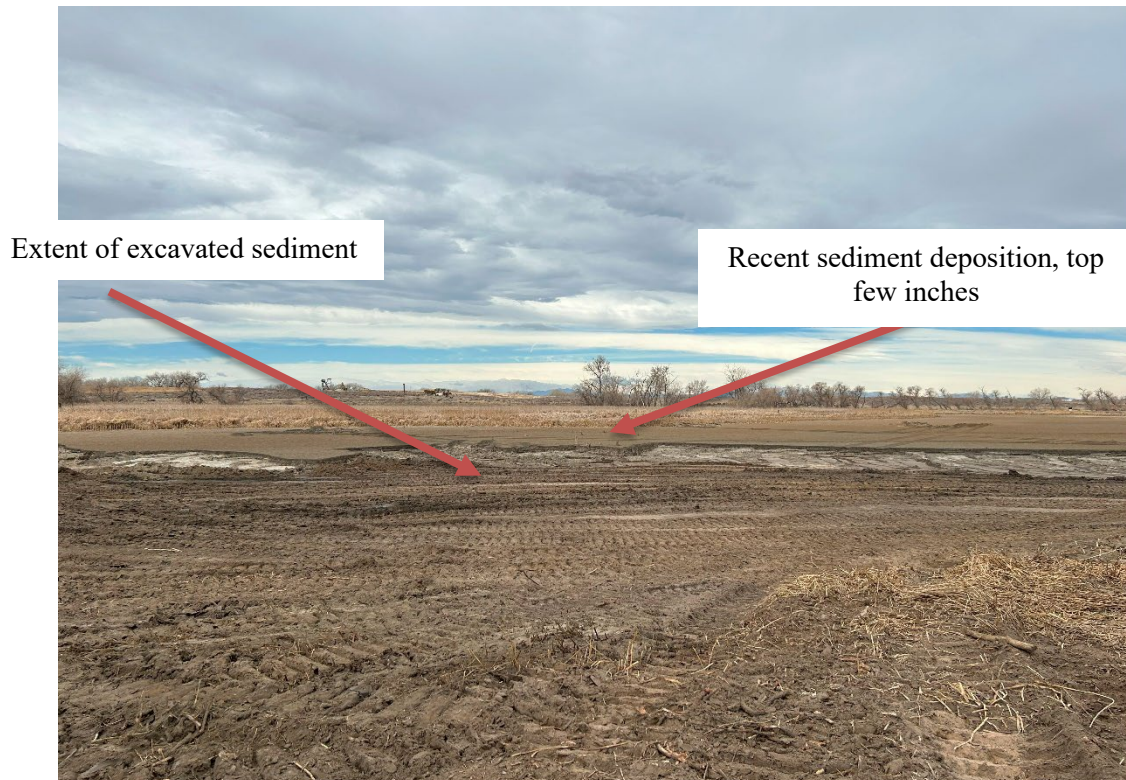


Photo 19: View of the Lake Christina containing discharged material from the Evans #2 Ditch, facing west.

Figure 1 – Lake Christina Timelapse



A. September 29, 1999, Google Earth Image



B. May 4, 2011, Google Earth Image



C. May 2, 2024, Google Earth Image

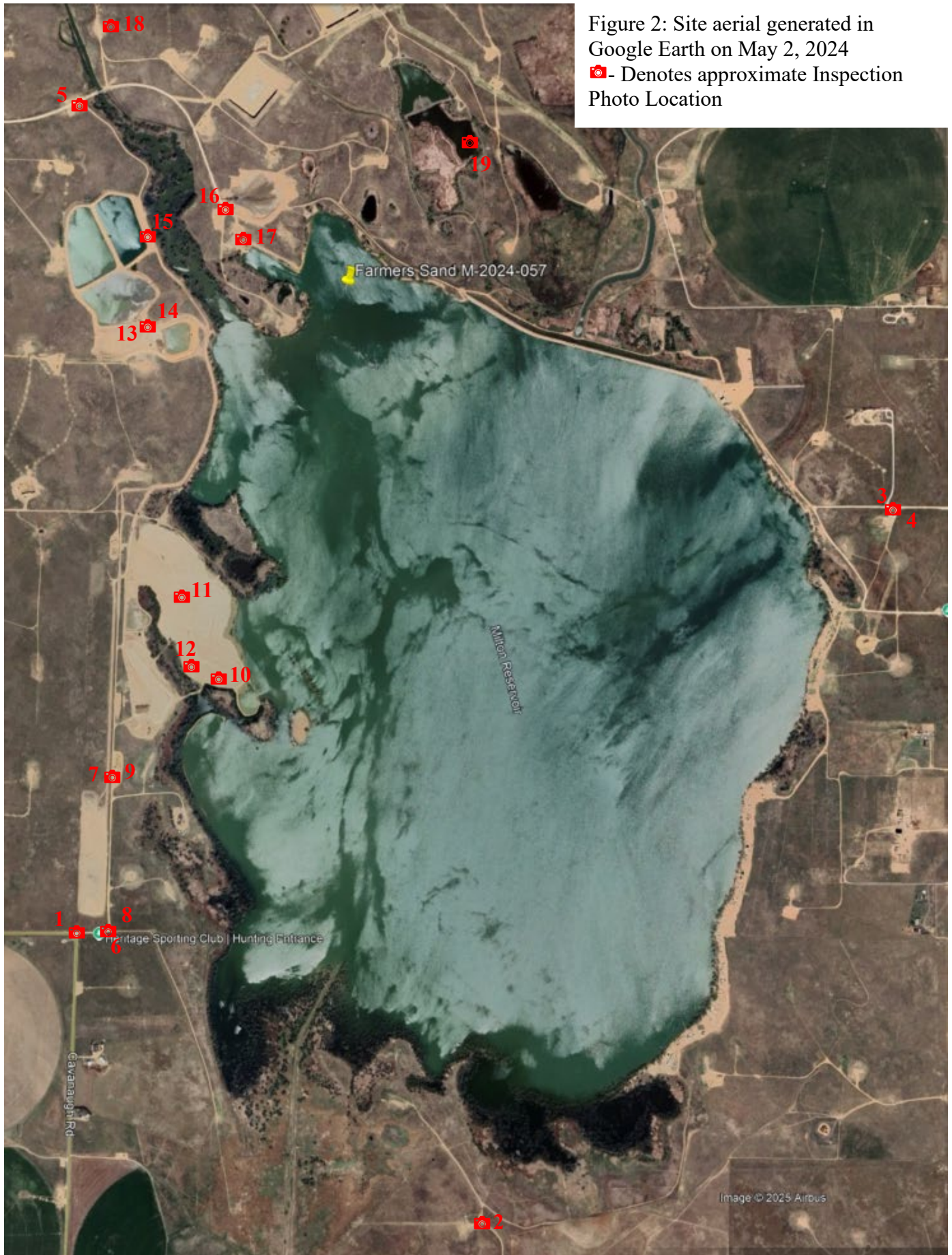


Figure 2: Site aerial generated in Google Earth on May 2, 2024
📷 - Denotes approximate Inspection Photo Location



Inspection Contact Address

Scott Edgar
The Farmers Reservoir and Irrigation Company
80 South 27th Avenue
Brighton, CO 80601