



April 14, 2025

Jodi Schreiber
PFM Consulting LLC
1774 North Cougar Drive
Pueblo West, CO 81007

**Re: Bradford Mesa Quarry, Permit No. M-2019-046, Technical Revision (TR-1),
Adequacy Review-1**

Dear Ms. Schreiber:

The Division of Reclamation, Mining and Safety (Division) is in the process of reviewing the above referenced Technical Revision to ensure that it adequately satisfies the requirements of the Colorado Mined Land Reclamation Act (§ § 34-32.5-101-34-32.5-125) (Act) and the Rules and Regulations for the Extraction of Construction Materials (Rules). During review of the material submitted, the Division determined that the following issue(s) of concern need to be adequately addressed before the Technical Revision can be considered for approval. Please provide the following:

1. The current permit application package approved for this site has undergone multiple extensive reviews. TR1, as submitted, proposes substantial changes to the approved mining and reclamation plan that do not appear to be necessary. If the permittee's desire is to substantially revise the approved Mining Plan and Reclamation Plan exhibits, this would need to be processed as an amendment application. It seems the revisions proposed with TR1 pertain to the following:
 - (a) Proposed removal of the on-site dump
 - (b) Proposed change in the order of the Phases
 - (c) Proposed changes in Phase sizes
 - (d) Proposed change in processing area placement
 - (e) Proposed changes in maximum disturbance

If the above summarization is accurate, please confirm this. If so, please go through the current exhibits, and provide revisions only where necessary. I have compiled the incompleteness and adequacy responses from the original permit application into one document so that it is easier for the Permittee, consulting firm, and the Division to review and agree upon proposed changes. I have attached the compiled permit file in the email



sent with this review. I have also provided highlighted areas (and corresponding comments) within the document that specifically need to be addressed if the list above is an accurate representation of the proposed changes. The highlighted sections are not to be misconstrued as the only areas that need to be revised but provide a starting point for discussions.

2. The “Bradford Mesa Pit – Phases” map provided with the TR1 application does not meet the requirements of Rule 6.2.1(2). Please ensure that the map contains the following information from Rule 6.2.1:

(2) Maps and Exhibits

Maps, except the index map, must conform to the following criteria:

- (a) show name of Applicant;
 - (b) must be prepared and signed by a registered land surveyor, professional engineer, or other qualified person;
 - (c) give date prepared;
 - (d) identify and outline the area which corresponds with the application;
 - (e) with the exception of the map of the affected lands required in Section 34-32.5-112(2)(d), C.R.S. 1984, as amended, shall be prepared at a scale that is appropriate to clearly show all elements that are required to be delineated by the Act and these Rules. The acceptable range of map scales shall not be larger than 1 inch = 50 feet nor smaller than 1 inch = 660 feet. Also, that a map scale, appropriate legend, map title, date and a north arrow shall be included.
3. The haul road is omitted from the permit boundary on the TR1 maps. The Division had made the determination that the road proposed to be used will require substantial upgrades in support of the mining operation and will meet the definition of affected lands per Rule 1.1(3). This haul road needs to be added back to the maps, with the dimensions and acreages provided in the currently approved permit.
 4. For the matter pertaining to the acreage discrepancy, please provide justification as to why you believe the survey acreage is incorrect.
 5. Once items 1-4 have been thoroughly addressed, a follow up review will be initiated to discuss the changes to Exhibit L and to the Division’s reclamation cost estimate.

Please submit your response(s) to the above listed issue(s) by at least three days prior to the decision date to allow the Division sufficient time for review. If you cannot address the above issues by the decision date, please request an extension to the decision due date, in writing, to ensure adequate time for the Division to review materials. A **decision due date of April 20, 2025** has been set. If any adequacy issues remain by the decision due date the Division may deny your

request. The Division will continue to review your Technical Revision and will contact you if additional information is needed.

If you have any questions, please send me an email at amber.gibson@state.co.us, or call me at 720-836-0967.

Sincerely,



Amber M. Gibson
Environmental Protection Specialist

Cc: Rock Southway via Paul Bottini, Southway Construction Company, Inc.
Jared Ebert, Senior EPS, DRMS