

STATE OF
COLORADO

Gibson - DNR, Amber <amber.gibson@state.co.us>

Lascar Pit Adequacy Review #1

PFM Consulting <pfmconsultingcompany@gmail.com>
To: "Gibson - DNR, Amber" <amber.gibson@state.co.us>

Mon, Apr 21, 2025 at 4:49 PM



IMG_0887.jpg

Please find enclosed the Mining and Reclamation Narrative, as well as the supporting documents as requested in the Adequacy Review #1. I've also included proof of submission of the updated documents to the Huerfano County Clerk for public viewing via FedEx delivery receipt.

Thank you!

Jodi Schreiber, Owner
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pfmconsultingcompany@gmail.com

[PFM Consulting Website](#)
[Titan Transport Website](#)
[Jodi Schreiber Farms Website](#)

“Success is not final, failure is not fatal; it is the courage to continue that counts.”

–Winston Churchill

11 attachments



Buzz Williams-SStructure Agreement-2025.pdf
161K



Post Office-Structure Agreement-Post Office 2025.pdf
162K



San Isabel Electric Structure Agreement 3.19.25.pdf
155K



Legal 2.1 PDF.pdf
9508K



Exhibit E Rec Map R5.pdf
9255K



Exhibit E Mining Map R7 pdf.pdf
1957K



Exhibit E Existing Conditions R5 pdf.pdf
2275K



Adequacy Review 1 4.17.2025.pdf
515K



Publication and Notices.pdf

651K



FedEx Confirmation.pdf

18K



Huerfano County Letter for Updated Documents.pdf

105K

Lascar Pit

M2025-004

April 2025 – Adequacy Review #1 Response

Conversion to a Construction Material

Regular 112 Operation

Reclamation Permit Application Package

Colorado Division of Reclamation, Mining, and
Safety

Siete Inc.

Introduction

The Lascar Pit is located approximately 13 miles north of Walsenburg, CO in Huerfano County at an elevation of 6093 feet. The Lascar Pit (currently permit M2023-005) was used as sand and gravel source for Colorado Project No. FBR 025A-045 and Federal Highway Administration Project 6982AF23C000001. This application is to re-permit the existing 111 to a new Regular 112 Operation reclamation permit. The permit boundary is shown on the Existing Conditions Map. Prior to mining, the site was used for rangeland and cattle grazing and will be reclaimed as such. The depth of excavation will be approximately 20 feet. Topsoil is expected to range from 3-4 inches.

The site is bordered by rangeland to the north, south, west, and east. The General Location Map in Exhibit A details the location of the Lascar Pit. The surface and mineral rights are owned by the Colorado State Land Board. A lease to mine and sell the gravel is attached for review. The permit area will include 30.0 acres.

6.4.1 Exhibit A

Legal Description

The site is approximately 13 miles north of Walsenburg, CO. The property is surrounded by dry rangeland in each direction. County Road 650 borders the south end of the site and Interstate 25 is to the east of the property. The main site access is located at the southwest corner of the site with access from County Road 650 and is shown on the General Location.

The total permit area is 30.0 acres.

1. Legal Description

A tract of land located within the west half of Section 36, Township 25 South, Range 67 West of the 6"1Principal Meridian of Huerfano County in the State of Colorado.

The pit can also be described as located at with a mine entry location of:

Latitude 37.821610°


Longitude -104.831848°

6.4.2 Exhibit B

Index Map



Legend

 30 Acre New Permit Boundary

- Nad 83
- 1)37.822479°-104.847934°

2)37.824395°-104.848050°

3)37.826690°-104.848061°

4)37.828384°-104.847843°

5)37.834001°-104.847875°

6)37.834105°-104.847663°

7)37.834322°-104.847489°

8)37.834494°-104.847275°

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300 ft

6.4.3 Exhibit C
Pre-Mining and Mining Plan Map Of
Affected Lands

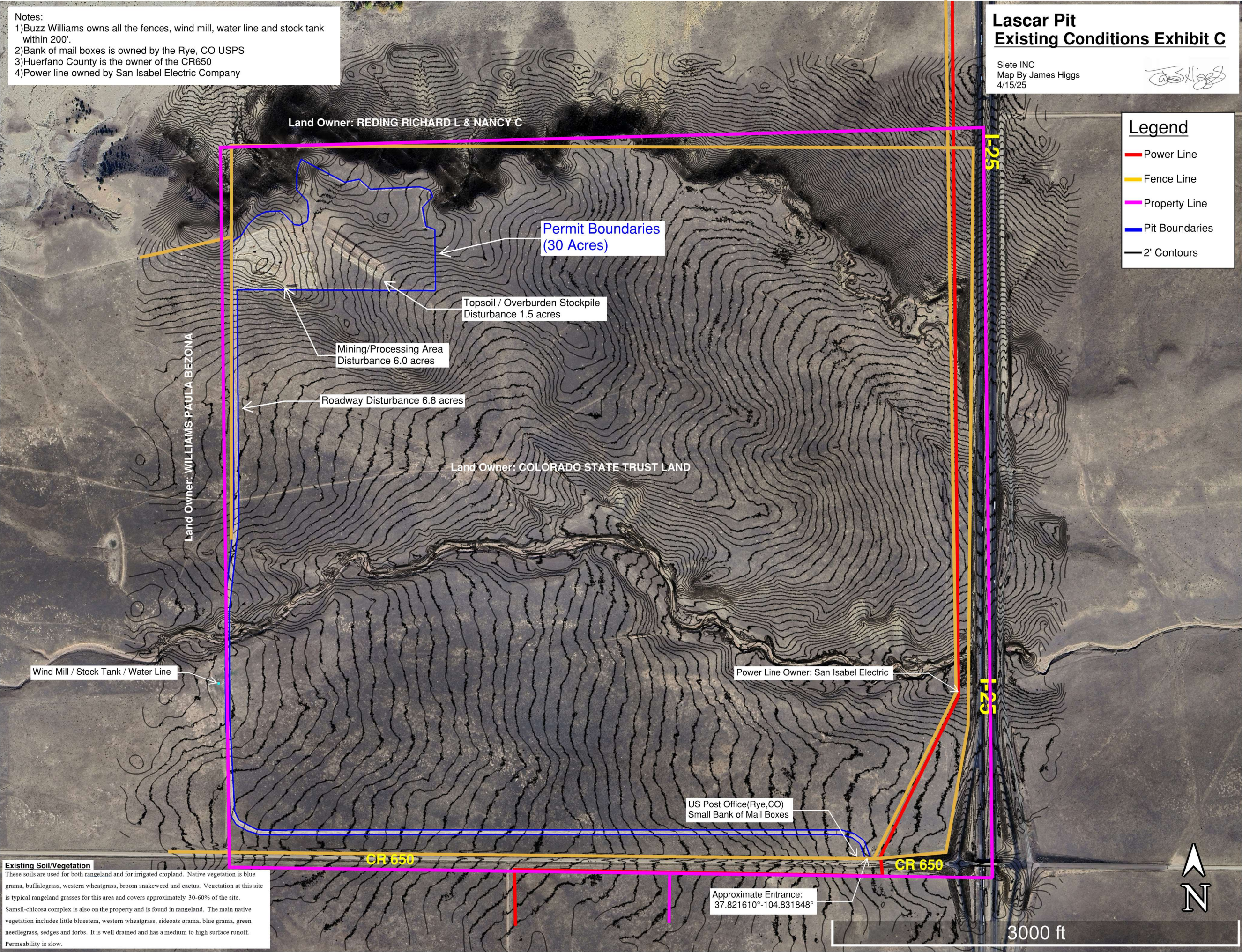
Notes:
1) Buzz Williams owns all the fences, wind mill, water line and stock tank within 200'.
2) Bank of mail boxes is owned by the Rye, CO USPS
3) Huerfano County is the owner of the CR650
4) Power line owned by San Isabel Electric Company

Lascar Pit
Existing Conditions Exhibit C

Siete INC
Map By James Higgs
4/15/25

Legend

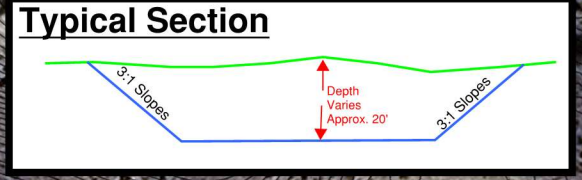
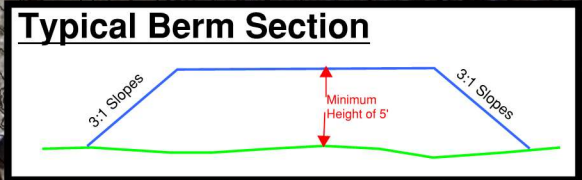
- Power Line
- Fence Line
- Property Line
- Pit Boundaries
- 2' Contours



Existing Soil/Vegetation
These soils are used for both rangeland and for irrigated cropland. Native vegetation is blue grama, buffalograss, western wheatgrass, broom snakeweed and cactus. Vegetation at this site is typical rangeland grasses for this area and covers approximately 30-60% of the site. Samsil-chicosa complex is also on the property and is found in rangeland. The main native vegetation includes little bluestem, western wheatgrass, sideoats grama, blue grama, green needlegrass, sedges and forbs. It is well drained and has a medium to high surface runoff. Permeability is slow.

Legend

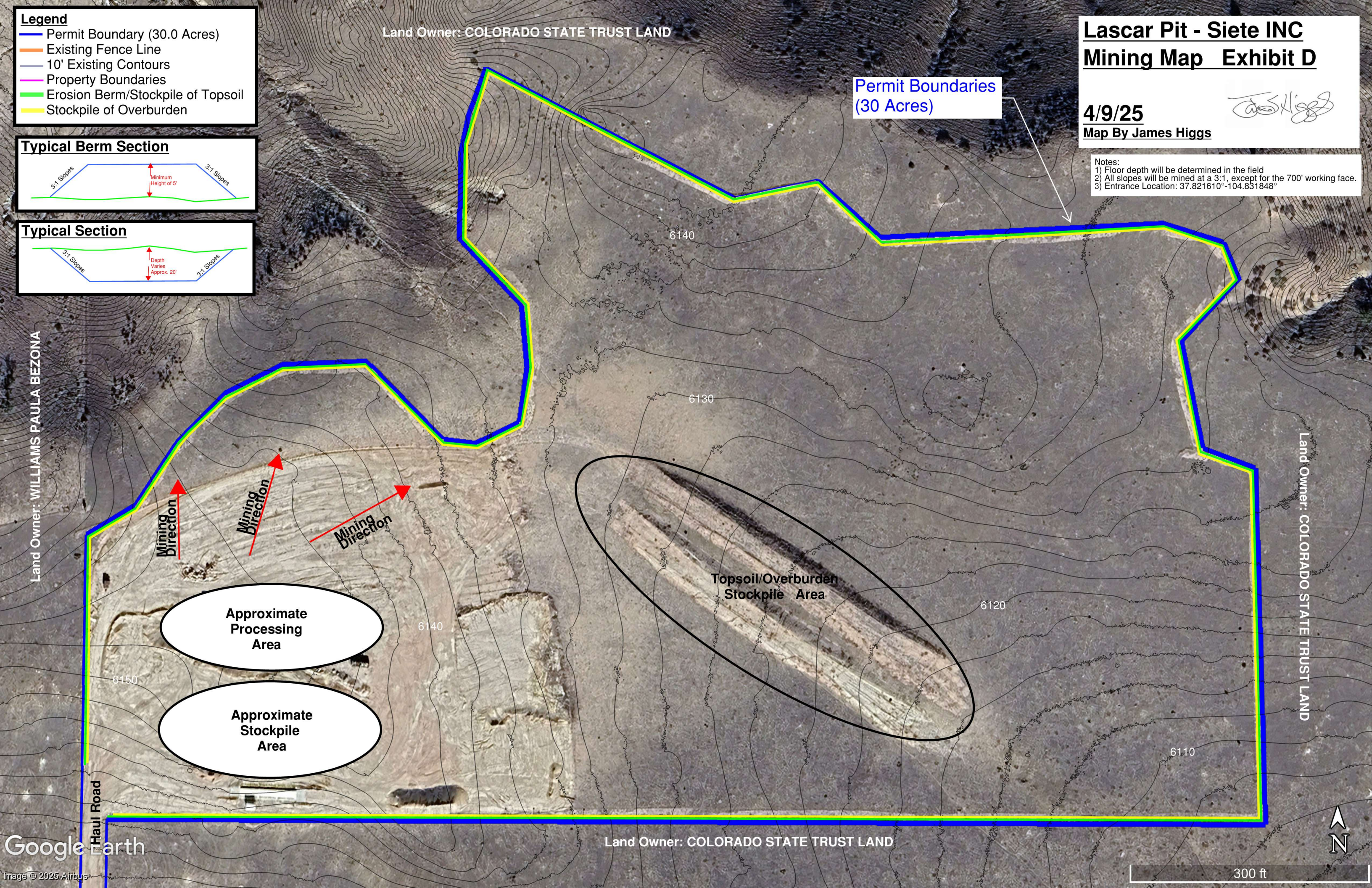
- Permit Boundary (30.0 Acres)
- Existing Fence Line
- 10' Existing Contours
- Property Boundaries
- Erosion Berm/Stockpile of Topsoil
- Stockpile of Overburden



Lascar Pit - Siete INC
Mining Map Exhibit D

4/9/25
Map By James Higgs

Notes:
1) Floor depth will be determined in the field
2) All slopes will be mined at a 3:1, except for the 700' working face.
3) Entrance Location: 37.821610°-104.831848°



6.4.4 Exhibit D

Mining Plan

1. Location and General Land Use Information

The site is located along Huerfano County Road 650 and Interstate 25 and is composed of dry rangeland. The parcel is currently leased for agricultural operations by the Colorado State Land Board.

2. Site Geology and Vegetation

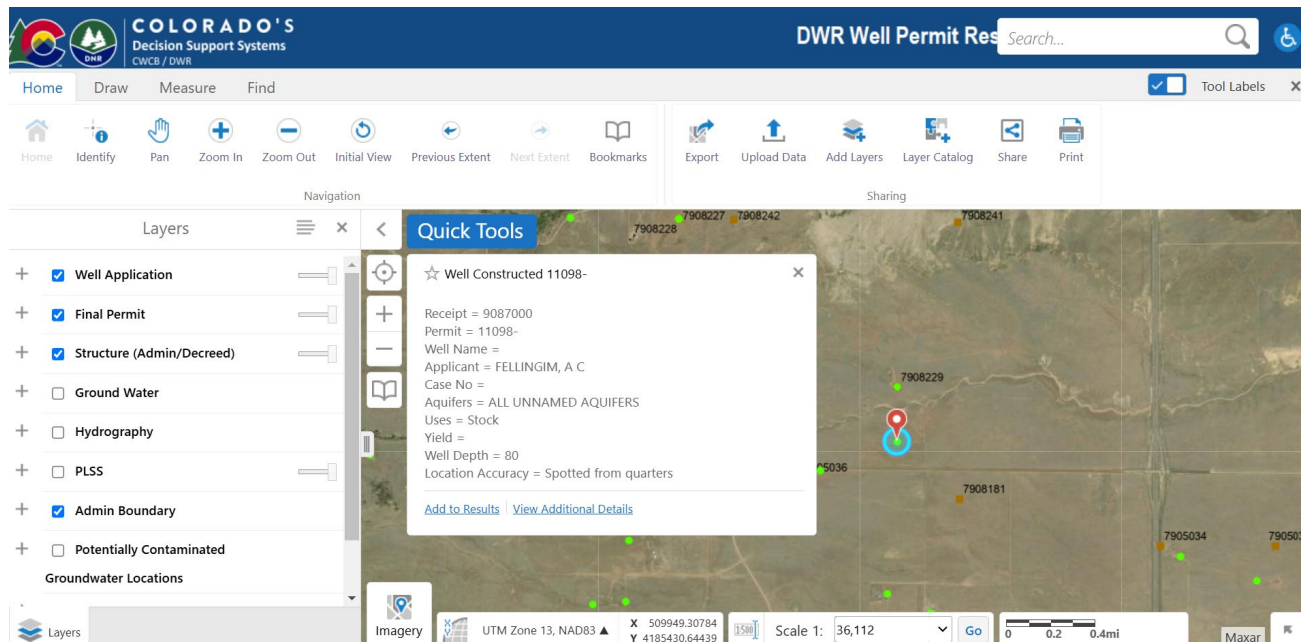
Site geology consists of 3 inches of topsoil. Mining will occur to a depth of approximately 20 feet. There are no hazardous or acid forming materials expected to be encountered during excavation. See the enclosed Natural Resources Conservation Service (NRCS) soil report for more details on surface composition. A majority of the site is composed of Baca Silt Loam. This material is well drained with slow to medium runoff and moderately slow permeability. These soils are used for both rangeland and for irrigated cropland. Native vegetation is blue grama, buffalograss, western wheatgrass, broom snakeweed and cactus. Vegetation at this site is typical rangeland grasses for this area and covers approximately 30-60% of the site.

Samsil-chicosa complex is also on the property and is found in rangeland. The main native vegetation includes little bluestem, western wheatgrass, sideoats grama, blue grama, green needlegrass, sedges and forbs. It is well drained and has a medium to high surface runoff. Permeability is slow.

3. Surface Hydrology

Pre-mining topography is shown on the Existing Conditions Map. All runoff on the undisturbed site runs to the south. Stormwater will be kept from leaving the site by using topsoil and overburden stockpiles which will surround the site following the perimeter. The current stockpiles are on the eastern edge of the site. As mining continues to the east, the stockpiles will be placed to encircle the full area over the mine's life. Stockpiles will be segregated. Stormwater that occurs on site will remain on site; however, the soil should allow for stormwater to infiltrate the site and pit floor within 72 hours.

Based on data from the Division of Water Resources Well Permit Search map, groundwater is not anticipated to be encountered during any phase of mining. The structure depicted on the map below shows the well depth at 80 feet. Mining is not anticipated to be deeper than 20 feet. If groundwater is encountered, excavation will be stopped. The area will then be backfilled with at least two feet of material and no mining will occur beyond that depth.



4. Wildlife

Environmental conditions, such as food and cover availability, is limited due to the climate. Small animals (rabbits, coyotes, etc.) are found in the surrounding environment. The site may also see white tail deer, antelope, prairie dog, various snakes and lizards. Impacts to wildlife will be mitigated through a weed management plan and reseeding all mined areas with a native rangeland seed mix.

5. Structures

There is a fence, stock tank, windmill, water line, powerline, cluster mailbox and County Road 650 that all lie within 200' of the permit boundary.

6. General Mine Conditions

The Existing Conditions Map shows the current conditions of the Lascar Pit. The pit will provide aggregate for local construction including gravel, road base, and landscape aggregate. Incidental materials not used for construction material will be used to reconstruct the pit floor and lessen the pit slopes. Mining will disturb up to 30 acres as shown on the Mining Map. The current operation under the 111 permit has disturbed approximately 14.3 acres of the 30-acre permit area. Approximately 6 acres of the current disturbance is the processing and mining area, 1.5 acres are the stockpiles and 6.8 acres is the road. All 30 acres could have active disturbances at any given time.

Mine access is via County Road 650 with access from Interstate 25. Mining of the gravel deposit will progress from the west side of the permit boundary and move to the east of the site. Earthmoving will be accomplished using front end loaders and scrapers. Aggregate will be processed and sized using a crusher and screens. All equipment is portable. Stockpile and processing areas will be in the southwest corner of the site. The pit will be sloped to a 3H:IV or shallower to restore the site's previous drainage pattern.

A portable asphalt hot plant or concrete plant may be located at the site and will be located inside of the processing area as shown on the Mining Map. This area, as well as the stockpile and processing areas, will be prepped by removing and stockpiling topsoil for later reclamation. Mined and processed aggregate will be stored surrounding the portable processing plant(s). Topsoil and overburden berms will be stored around the perimeter of the permit boundary as well as the current stockpile to the east of the current disturbance and will be used in reclamation and will be segregated. Topsoil stockpiles will be seeded within 180 days of its stockpiling, if reclamation has not started at that time.

7. Mining Timetable

The life of the proposed operation is difficult to quantify due to changing economic conditions in the construction industry and onsite aggregate quality. It is anticipated that the site will have a life of approximately 5 years.

8. Mine Facilities and Operation

Toxic or acid-producing materials will not be encountered during the mining operation. No blasting or explosives will occur/be used during mining nor on site. Bulk storage of fuel and

small amounts of lubricants may be stored on site and will be either double walled or housed within an earthen berm that will have a capacity of at least 110% of the volume of the tanks to be kept onsite. No permanent structures will be built within the permit area as part of this operation. Water will be used to control dust on site. Water for this operation will be purchased from an offsite source in Colorado City and trucked to the site. It is estimated that the operation will consume up to 10,000 gallons of water per day for dust suppression. Portable plants will be used onsite for rock crushing. Spray bars will be used in the crushing and screening plants to minimize dust.

Aggregate processing equipment is portable. The processing equipment may move and follow active mining throughout the site. Portable mining equipment such as loaders, dozers, trucks, and excavators will be serviced onsite as needed. Upon reclamation, all portable equipment will be removed from the site.

On-site roads are temporary and will change as mining progresses to the east. Support equipment will come to the site on an as-needed basis. Night mining activity may occur in the operation and portable lighting may be used within the pit from time to time. Portable toilets will be used for employees.

Stormwater drainage on the disturbed areas will be directed by berms that border all disturbed areas of the site. The operation will create a depressed area. No stormwater or process water will leave the site and will be directed toward the center of the disturbed area where it will infiltrate within 72 hours. Except for the highwall, which will not exceed 700 feet in length and 20 feet in height, slopes will be maintained at 3H:1V or shallower.

9. Topsoil and Overburden Handling

Topsoil will be salvaged from the newly disturbed areas and placed in temporary perimeter berms surrounding the disturbed area. Current piles are shown at the eastern edge of the disturbance on the Mining Map. These stockpiles will be seeded with the reclamation seed mix listed below. Topsoil is expected to be approximately 3 inches, and overburden is expected to be approximately 18-30 inches and is a silty clay. The topsoil and overburden berms will be used for reclamation to construct 3H:1V slopes or shallower and will be segregated. The deposit is approximately 20 feet in depth. The site consists of mostly Baca Silt Loam and Fort Collins Loam with a smaller portion of Samsil-Chicosa Complex. This material is well drained with slow to medium runoff and moderately slow

permeability. These soils are used for both rangeland and for irrigated cropland. See attached Soil Resource Report. The underlying stratum is a shale.

The haul road will be approximately 30 feet wide and will be constructed as with any gravel road, by removing the topsoil to a width of 30 feet. The haul road is approximately 1.65 miles in length.

6.4.S Exhibit E Reclamation Plan

1. General Reclamation Plan

The maximum disturbed area to be reclaimed under this permit is 30.0 acres. Post-mining land use will return the site back to dry rangeland with native grasses. All areas of the site including will be reclaimed to 3H:1V or shallower. As described in the mining plan, reclamation will occur concurrently with mining. No haul roads will remain following reclamation. All reclaimed areas will be sloped, topsoil replaced and seeded with the approved seed mix. All material used for backfilling will be generated from onsite sources. Onsite topsoil will be adequate for reclamation purposes. The processing area will move through the site as mining occurs but will be reclaimed completely upon the mining activities being completed.

2. Topsoil Replacement

Topsoil onsite is anticipated to be 3 inches thick with overburden placement being 6 inches thick. During mining, all topsoil will be stored in the site perimeter berm of the site and are shown on the Reclamation Map. The current Topsoil and Overburden Stockpiles are on the eastern edge of the current disturbance and will be incorporated into the perimeter berms around the mine area as mining proceeds to the east. Topsoil and Overburden Stockpiles will be segregated. Topsoil Stockpiles will be seeded within 180 days of its stockpiling, if reclamation has not started at that time.

3. Haul Roads and Access

One entrance road will connect the site to County Road 650. Onsite haul roads will move as mining moves throughout the site. No haul roads will remain following reclamation. Reclamation will encompass both the internal haul roads and access/haul road.

4. Reclamation Timetable

Reclamation will occur concurrently with mining. Mining is anticipated to be completed in this 30-acre area in 5 years. As active mining moves through the site, the highwall will be sloped to a 3H:1V, except for 700'. Topsoil of 3" will be placed throughout the life of the mine and seeding may occur in reclaimed portions of the mine while active mining has moved further through the site. Waste material will be used to help slope the floor of the pit. It is difficult to estimate the depth of waste material replacement, as it will be based upon site conditions at the time of backfilling to the appropriate slope. Reclamation costs were calculated on topsoil and seeding activities for all 30 acres and backfilling the maximum highwall length and height to ensure that there were adequate costs calculated for all 30 acres of reclamation.

5. Revegetation Plan

For reclamation, seed will be drilled at a rate of 19 pounds per acre. Heavy furrows may be left to help concentrate moisture and provide shade for vegetation establishment. An NRCS approved seed mix will be used. It is anticipated that the following mix would be adequate for reclamation purposes. Straw mulch will be crimped in at a rate of 400 pounds per acre.

No fertilizer is anticipated to be used during the reclamation of the site.

Native Grass Seed Mix

SPECIES	APPLICATION RATE (drilled)
Western Wheatgrass	16 pounds of pure live seed per acre
Blue Orama	1.2 pounds of pure live seed per acre
Galleta	1.6 pounds of pure live seed per acre
Sand Dropseed	0.1 pounds of pure live seed per acre
Winter Fat	0.1 pounds of pure live seed per acre

6. Post-Reclamation Site Drainage

Final reclamation surfaces will be graded so that waters flow in a similar path to the original pre-mining path. Any onsite water will infiltrate within 72 hours.

7. Monitoring Reclamation Success

The local NRCS office may assist in any reclamation issues or to help control erosion. Weed mitigation will occur through mechanical removal. If there are issues that arise

regarding noxious weed control, Siete Inc. will contact the Huerfano County Noxious Weed Coordinator for guidance.

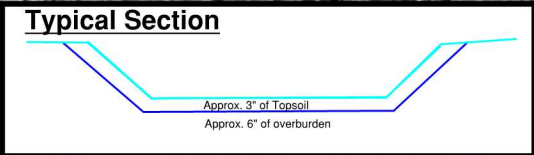
8. Reclamation Bond

Reclamation cost estimates were calculated on a per acre basis and applied to maximum active mining area of 30 acres.

6.4.6 EXHIBIT F
Reclamation Plan Map

Legend

- Permit Boundary (30.0 Acres)
- Existing Fence Line
- 2' Finish Contours
- Property Boundaries
- Erosion Berm/Stockpile of Topsoil & Overburden



Lascar Pit - Siete INC
Reclamation Map Exhibit E

4/11/25
Map By James Higgs

Land Owner: WILLIAMS PAULA BEZONA

Land Owner: COLORADO STATE TRUST LAND

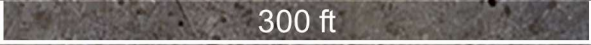
Permit Boundaries
(30 Acres)

Land Owner: COLORADO STATE TRUST LAND

Land Owner: COLORADO STATE TRUST LAND

Notes:

- 1) Floor depth will be determined in the field
- 2) All slopes will be mined at a 3:1, except for the working face.
- 3) Entrance Location: 37.821735°-104.847967°
- 4) All contours are approximate.



Legend

- Permit Boundary (30.0 Acres)
- Existing Fence Line
- 2' Finish Contours
- Property Boundaries
- Erosion Berm/Stockpile of Topsoil & Overburden

Typical Section

Approx. 3" of Topsoil
Approx. 6" of overburden



Legend

- Permit Boundary (30.0 Acres)
- Existing Fence Line
- 2' Finish Contours
- Property Boundaries
- Erosion Berm/Stockpile of Topsoil & Overburden

Typical Section

Approx. 3" of Topsoil
Approx. 6" of overburden

Lascar Pit - Siete INC
Reclamation Map Exhibit E

4/11/25
Map By James Higgs

Land Owner: COLORADO STATE TRUST LAND



Google Earth

Notes:

- 1) Floor depth will be determined in the field
- 2) All slopes will be mined at a 3:1, except for the working face.
- 3) Entrance Location: 37.821735°-104.847967°
- 4) All contours are approximate.

Image © 2025

Legend

- Permit Boundary (30.0 Acres)
- Existing Fence Line
- 2' Finish Contours
- Property Boundaries
- Erosion Berm/Stockpile of Topsoil & Overburden

Typical Section

Approx. 3" of Topsoil
Approx. 6" of overburden

Lascar Pit - Siete INC
Reclamation Map Exhibit E

4/11/25
Map By James Higgs



Notes:
1) Floor depth will be determined in the field
2) All slopes will be mined at a 3:1, except for the working face.
3) Entrance Location: 37.821735°-104.847967°
4) All contours are approximate.

6.4.7 EXHIBIT G

Water Information

Mining is expected to have no impact on the prevailing hydrologic balance. Groundwater will not be exposed, and stormwater will not leave the site. The site does not anticipate discharging stormwater or process water drainage. Water depth is anticipated to be greater than the 20 feet mining depth, as noted below with nearby well depth recorded at 80 feet and 369 feet. Siete has a Stormwater Permit through the WQCD at CDPHE.

Runoff occurs as overland flow to natural drainage ravines in the vicinity. Stormwater best management practices such as waddles, straw bales, and perimeter berms will be placed to effectively manage stormwater. Historic will be maintained during mining.

Consumptive use of water may occur as dust suppression on the haul road and affected areas. The operator will use water from a nearby source, in Colorado City. Water usage onsite is estimated at 10,000 gallons per day.

6.4.7 Exhibit H

Wildlife Information

The property is used for rangeland. The site will be returned to rangeland during reclamation. Colorado Parks and Wildlife was contacted for comment during the permit application process. Their response is attached for review.

Forage and cover for wildlife is very limited due to the arid climate. *Small* animals, including rabbits, foxes, etc. are found in the surrounding environment. The site is within range for white tail deer, antelope, prairie dog, various snakes, various lizards, and ring-necked pheasant. Impacts to wildlife will be mitigated through a weed management plan and reseeding all mined areas with a diverse and native rangeland seed mix.

Burrowing owls may have the potential to be on or near the mine site. Siete employees will monitor for prairie dog or badger holes that might provide adequate habitat for burrowing owls. If they encounter such habitat, employees will monitor those areas monthly to ensure that the burrowing owl

is not present. Fencing is not present onsite around the active mine area, which will lessen any negative impacts on migratory patterns. Additionally, the mine area is a small footprint and will be reclaimed concurrent to mining operations, thus decreasing wildlife impacts. Seeding with an appropriate native vegetation for the area will also help to supply cover for smaller wildlife species and help to reduce any impacts.

6.4.8 Exhibit I

Soils Information

A Custom Soil Resource Report for Huerfano County, specific to this site, is attached for review. A majority of the site is composed of Baca Silt Loam. This material is well drained with slow to medium runoff and moderately slow permeability. These soils are used for both rangeland and for irrigated cropland.

Topsoil is found at a depth of 3 inches onsite, with overburden accounting for approximately 18-30" onsite. Mineable aggregate is found up to a depth of approximately 20 feet.

6.4.9 Exhibit J

Vegetation Information

The Lascar Pit is characterized by rangeland. Native vegetation includes Sideoats Orama, Western Wheatgrass, Little Bluestem, cactus, yucca, and sagebrush. Onsite conditions show that vegetation varies dependent on precipitation. Vegetation onsite can range from 50% coverage to 85% coverage with 100% being grasses and forbs. With the arid climate and the above soil types, vegetation tends to be sparse and depends on years with abundant moisture. Vegetation that tends to do well includes those that are found onsite, Sideoats Grama, Western Wheatgrass, cactus, sagebrush and yucca. The environment doesn't normally sustain any tall or low shrubs well. Carrying capacity of a site such as this is 40 acres per one head of cattle.

6.4.10 Exhibit K

Climate

Climate data was pulled from the Weather World website for the Huerfano County, Colorado area.

Huerfano County Monthly Climate Averages

	🏠 12 Month Climate Scroll 🏠						*F ➡ *C
Month	January	February	March	April	May	June	
Avg. Temperatures	Hi 33°F Lo 11°F	Hi 35°F Lo 13°F	Hi 45°F Lo 22°F	Hi 54°F Lo 28°F	Hi 63°F Lo 37°F	Hi 76	
Avg. Wind Speed	7 mph	8 mph	8 mph	8 mph	7 mph	7 mph	
Avg. Precipitation	0.8 in	1.2 in	1.8 in	2.5 in	3.8 in	2.8 in	
Average Humidity	76%	72%	60%	51%	49%	44%	
Avg. Cloud Cover	28%	29%	26%	26%	27%	21%	
Pressure Average	30.1 in	30.1 in	30.0 in	29.9 in	29.9 in	29.9 in	
Average Dry Days	21	17	19	17	19	19	
Avg. Precip. Days	6	6	6	8	11	11	
Avg. Snow Days	5	6	6	5	1	0	
Average Fog Days	0	0	0	0	0	0	
Average UV Index	2	2	2	3	3	5	
Avg. Hours of Sun	266	234	269	253	256	282	

Huerfano County Monthly Climate Averages

Month	July	August	September	October	November	December
Avg. Temperatures	Hi 79°F Lo 53°F	Hi 77°F Lo 51°F	Hi 71°F Lo 46°F	Hi 58°F Lo 33°F	Hi 46°F Lo 23°F	Hi 35°F Lo 19°F
Avg. Wind Speed	5 mph	5 mph	6 mph	7 mph	7 mph	8 mph
Avg. Precipitation	5.2 in	4.2 in	2.1 in	1.5 in	0.8 in	0.9 in
Average Humidity	55%	54%	51%	51%	55%	69%
Avg. Cloud Cover	29%	25%	19%	16%	16%	26%
Pressure Average	30.0 in	30.0 in	30.0 in	30.0 in	30.1 in	30.1 in
Average Dry Days	15	18	23	23	24	23
Avg. Precip. Days	16	14	7	6	3	5
Avg. Snow Days	0	0	0	2	3	4
Average Fog Days	0	0	0	0	0	0
Average UV Index	4	5	4	2	2	1
Avg. Hours of Sun	263	287	287	308	302	276

6.4.12 Exhibit L

Reclamation Costs

Direct Tasks	Unit	Quantity	Cost	Total Cost
Grading Highwalls				
3H: 1V Pushdown (700'x20') Dozer	Hours	30		\$10,000.00
Placing Topsoil/Fines				
30 Acres				
Bulldozer	Hours	2	\$145.00	\$290.00
Loader	Hours	2	\$145.00	\$290.00
Seeding				
Discing/Chiseling	Hours	2	\$300.00	\$600.00
Drilling	Hours	3	\$300.00	\$900.00
Seed Mix	Acre		\$700.00	\$700.00
Mulch	Acre		\$187.50	\$187.50
Tracking seed/mulch				
Dozer	Hours	0.33	\$154.00	\$50.82
Area Reclaimed	Acre	30		\$100,549.60
Mobilization Fee	Hours		\$1000	\$1,000.00
Indirect Tasks				
Liability Insurance			0.0155	\$1,473.00
Performance Bond			0.015	\$1,425.00
Profit			0.05	\$4,750.00
Job Superintendent	Hours	20	\$88.00	\$1,760.00
Miscellaneous Indirect				\$0.00
Total Bond				\$110,957.00

6.4.13 Exhibit M

Other Permits and Licenses

- Huerfano County Special Use Permit
- CDPHE Stormwater Discharge Permit
- CDPHE Air Pollutant Emissions Notice

6.4.14 Exhibit N

Source Of Legal Right to Enter

The surface and mineral owner of the property which will be mined is the Colorado State Land Board. The Operator is Siete Inc. Attached is the lease between the two entities.

6.4.15 Exhibit O

Owner of Record of Affected Land Surface Area and Substance to be Mined

The surface and mineral owner of the property which will be mined is the Colorado State Land Board.

6.4.16 Exhibit P

Municipalities Within Two Miles

There are no municipalities within two miles of the site.

6.4.17 Exhibit Q

Proof of Mailing Notices to Board of County Commissioners and Soil Conservation District

6.4.18 Exhibit R

Proof of Filing with County Clerk and Recorder

6.4.19 Exhibit S

Permanent Man-Made Structures

Buzz Williams – Fence, Stock Tank, Water Line, Windmill

USPS – Mailbox Cluster

San Isabel Electric Cooperative – Electrical Distribution Powerline, Attachments and Associated Equipment

Huerfano County – County Road 650

An example Structure Agreement which meets the requirements of the Statutes is shown below.

Structure Agreement

This letter has been provided to you as the owner of a structure on or within two hundred (200) feet of a proposed mine site. The State of Colorado, Division of Reclamation, Mining and Safety ("Division") requires that where a mining operation will adversely affect the stability of any significant, valuable and permanent man-made structure located within two hundred (200) feet of the affected land, the Applicant shall either:

- a) Provide a notarized agreement between the Applicant and the Person(s) having an interest in the structure, that the Applicant is to provide compensation for any damage to the structure; or
- b) Where such an agreement cannot be reached, the Applicant shall provide an appropriate engineering evaluation that demonstrates that such structure shall not be damaged by activities occurring at the mining operation; or
- c) Where such structure is a utility, the Applicant may supply a notarized letter, on utility letterhead, from the owner(s) of the utility that the mining and reclamation activities, as proposed, will have "no negative effect" on their utility. (*Construction Materials Rule 6.3.12 and Rule 6.4.19 & Hard Rock/Metal Mining Rule 6.3.12 and Rule 6.4.20*)

The Colorado Mined Land Reclamation Board ("Board") has determined that this form, if properly executed, represents an agreement that complies with Construction Materials Rule 6.3.12(a), Rule 6.4.19(a), and C.R.S. § 34-32.5-115(4)(e) and with Hard Rock/Metal Mining Rule 6.3.12(a), Rule 6.4.20(a), and C.R.S. § 34-32-115(4)(d). This form is for the sole purpose of ensuring compliance with the Rules and Regulations and shall not make the Board or Division a necessary party to any private civil lawsuit to enforce the terms of the agreement or create any enforcement obligations in the Board or the Division.

The following structures are located on or within 200 feet of the proposed affected area:

1. Fence, Stock Tank, Water Line and Windmill
2. _____
3. _____
4. _____
5. _____

(Please list additional structures on a separate page)

CERTIFICATION

The Applicant, Baxter Kirkland (print applicant/company name),
by Siete, Inc. (print representative's name), as President (print
representative's title), does hereby certify that Buzz Williams (structure owner) shall
be compensated for any damage from the proposed mining operation to the above listed structure(s)
located on or within 200 feet of the proposed affected area described within Exhibit A, of the Reclamation
Permit Application for Lascar Pit (operation name),
File Number M- 2025-004.

*This form has been approved by the Colorado Mined Land Reclamation Board pursuant to its
authority under the Colorado Land Reclamation Act for the Extraction of Construction Materials and
the Colorado Mined Land Reclamation Act for Hard Rock, Metal, and Designated Mining Operations.
Any alteration or modification to this form shall result in voiding this form.*

NOTARY FOR PERMIT APPLICANT

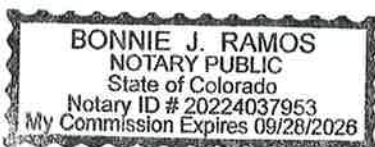
ACKNOWLEDGED BY:

Applicant [Signature] Representative Name Baxter Kirkland
Date 3/19/2025 Title President

STATE OF Colorado)
) ss.
COUNTY OF Pueblo)

The foregoing was acknowledged before me this 19 day of March, 2025, by
Baxter Kirkland as President of Siete, Inc.

Bonnie J. Ramos My Commission Expires: 09/28/2026
Notary Public



NOTARY FOR STRUCTURE OWNER

ACKNOWLEDGED BY:

Structure Owner Buzz William Name Buzz Williams

Date 3/19/25 Title Structure Owner

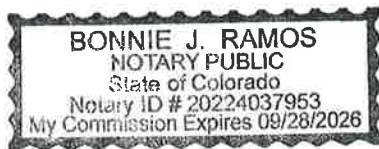
STATE OF Colorado)
) ss.

COUNTY OF Pueblo)

The foregoing was acknowledged before me this 19 day of March, 2025, by
Buzz Williams as Structure Owner of Lascar Rd. Pit.

Bonnie J. Ramos
Notary Public

My Commission Expires: 09/28/2026



An example Structure Agreement which meets the requirements of the Statutes is shown below.

Structure Agreement

This letter has been provided to you as the owner of a structure on or within two hundred (200) feet of a proposed mine site. The State of Colorado, Division of Reclamation, Mining and Safety ("Division") requires that where a mining operation will adversely affect the stability of any significant, valuable and permanent man-made structure located within two hundred (200) feet of the affected land, the Applicant shall either:

- a) Provide a notarized agreement between the Applicant and the Person(s) having an interest in the structure, that the Applicant is to provide compensation for any damage to the structure; or
- b) Where such an agreement cannot be reached, the Applicant shall provide an appropriate engineering evaluation that demonstrates that such structure shall not be damaged by activities occurring at the mining operation; or
- c) Where such structure is a utility, the Applicant may supply a notarized letter, on utility letterhead, from the owner(s) of the utility that the mining and reclamation activities, as proposed, will have "no negative effect" on their utility. (*Construction Materials Rule 6.3.12 and Rule 6.4.19 & Hard Rock/Metal Mining Rule 6.3.12 and Rule 6.4.20*)

The Colorado Mined Land Reclamation Board ("Board") has determined that this form, if properly executed, represents an agreement that complies with Construction Materials Rule 6.3.12(a), Rule 6.4.19(a), and C.R.S. § 34-32.5-115(4)(e) and with Hard Rock/Metal Mining Rule 6.3.12(a), Rule 6.4.20(a), and C.R.S. § 34-32-115(4)(d). This form is for the sole purpose of ensuring compliance with the Rules and Regulations and shall not make the Board or Division a necessary party to any private civil lawsuit to enforce the terms of the agreement or create any enforcement obligations in the Board or the Division.

The following structures are located on or within 200 feet of the proposed affected area:

1. Cluster Mailbox _____
2. _____
3. _____
4. _____
5. _____

(Please list additional structures on a separate page)

CERTIFICATION

The Applicant, Baxter Kirkland (print applicant/company name),
by Siete, Inc. (print representative's name), as President (print
representative's title), does hereby certify that United States Post Office (structure owner) shall
be compensated for any damage from the proposed mining operation to the above listed structure(s)
located on or within 200 feet of the proposed affected area described within Exhibit A, of the Reclamation
Permit Application for Lascar Pit (operation name),
File Number M- 2025-004.

*This form has been approved by the Colorado Mined Land Reclamation Board pursuant to its
authority under the Colorado Land Reclamation Act for the Extraction of Construction Materials and
the Colorado Mined Land Reclamation Act for Hard Rock, Metal, and Designated Mining Operations.
Any alteration or modification to this form shall result in voiding this form.*

NOTARY FOR PERMIT APPLICANT

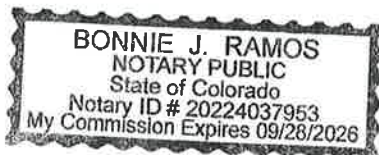
ACKNOWLEDGED BY:

Applicant B. W. S. Representative Name Baxter Kirkland
Date March 19, 2025 Title President

STATE OF Colorado)
) ss.
COUNTY OF Pueblo)

The foregoing was acknowledged before me this 19 day of March, 2025, by
Baxter Kirkland as President of Siete, Inc.

Bonnie J. Ramos My Commission Expires: 09/28/2026
Notary Public



NOTARY FOR STRUCTURE OWNER

ACKNOWLEDGED BY:

Structure Owner United States Post Office Name Jessica Beckham

Date 3/19/2025 Title Clerk Rye / Pueblo Co

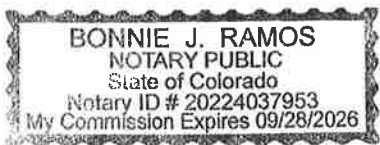
STATE OF Colorado)
) ss.

COUNTY OF Pueblo)

The foregoing was acknowledged before me this 19 day of March, 2025 by
Jessica Beckham as Postoffice Clerk of Rye-Pueblo Post office.

Bonnie J. Ramos
Notary Public

My Commission Expires: 09/28/2026



An example Structure Agreement which meets the requirements of the Statutes is shown below.

Structure Agreement

This letter has been provided to you as the owner of a structure on or within two hundred (200) feet of a proposed mine site. The State of Colorado, Division of Reclamation, Mining and Safety ("Division") requires that where a mining operation will adversely affect the stability of any significant, valuable and permanent man-made structure located within two hundred (200) feet of the affected land, the Applicant shall either:

- a) Provide a notarized agreement between the Applicant and the Person(s) having an interest in the structure, that the Applicant is to provide compensation for any damage to the structure; or
- b) Where such an agreement cannot be reached, the Applicant shall provide an appropriate engineering evaluation that demonstrates that such structure shall not be damaged by activities occurring at the mining operation; or
- c) Where such structure is a utility, the Applicant may supply a notarized letter, on utility letterhead, from the owner(s) of the utility that the mining and reclamation activities, as proposed, will have "no negative effect" on their utility. (*Construction Materials Rule 6.3.12 and Rule 6.4.19 & Hard Rock/Metal Mining Rule 6.3.12 and Rule 6.4.20*)

The Colorado Mined Land Reclamation Board ("Board") has determined that this form, if properly executed, represents an agreement that complies with Construction Materials Rule 6.3.12(a), Rule 6.4.19(a), and C.R.S. § 34-32.5-115(4)(e) and with Hard Rock/Metal Mining Rule 6.3.12(a), Rule 6.4.20(a), and C.R.S. § 34-32-115(4)(d). This form is for the sole purpose of ensuring compliance with the Rules and Regulations and shall not make the Board or Division a necessary party to any private civil lawsuit to enforce the terms of the agreement or create any enforcement obligations in the Board or the Division.

The following structures are located on or within 200 feet of the proposed affected area:

1. Electrical Distribution Power Line, Attachments and Associated Equipment
2. _____
3. _____
4. _____
5. _____

(Please list additional structures on a separate page)

CERTIFICATION

The Applicant, Baxter Kirkland (print applicant/company name),
by Siete, Inc. (print representative's name), as President (print
representative's title), does hereby certify that San Isabel Electric Association (structure owner) shall
be compensated for any damage from the proposed mining operation to the above listed structure(s)
located on or within 200 feet of the proposed affected area described within Exhibit A, of the Reclamation
Permit Application for Lascar Pit (operation name),
File Number M- 2025-004.

*This form has been approved by the Colorado Mined Land Reclamation Board pursuant to its
authority under the Colorado Land Reclamation Act for the Extraction of Construction Materials and
the Colorado Mined Land Reclamation Act for Hard Rock, Metal, and Designated Mining Operations.
Any alteration or modification to this form shall result in voiding this form.*

NOTARY FOR PERMIT APPLICANT

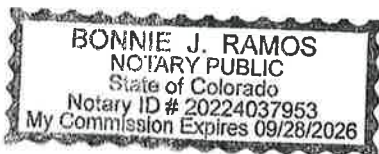
ACKNOWLEDGED BY:

Applicant B. W. K. Representative Name Baxter Kirkland
Date 3-19-2025 Title President

STATE OF Colorado
COUNTY OF Pueblo) ss.

The foregoing was acknowledged before me this 19 day of March, 2025, by
Baxter Kirkland as President of Siete, Inc.

Bonnie J. Ramos My Commission Expires: 09/28/2026
Notary Public



NOTARY FOR STRUCTURE OWNER

ACKNOWLEDGED BY:

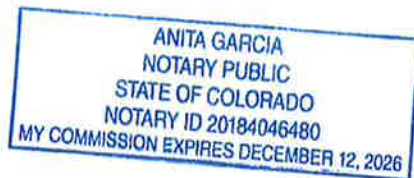
Structure Owner Eldon Ryan Elarton Name Eldon Ryan Elarton

Date 3-19-2025 Title General Manager

STATE OF Colorado)
) ss.
COUNTY OF Pueblo)

The foregoing was acknowledged before me this 19 day of March, 2025, by
Eldon Ryan Elarton as General Manager of Santabel Electric Association

Anita Garcia My Commission Expires: 12/12/2026
Notary Public





PFM Consulting LLC

April 18, 2025

Huerfano County Clerk and Recorder
401 Main Street
Walsenburg, CO 81089

RE: Updated Lascar Pit DRMS Application Documents

Please see enclosed updated documents for the above-referenced project. Please include these in the documents made available for public review.

Sincerely,

Jodi Schreiber

Jodi Schreiber
Owner, PFM Consulting LLC

1774 N. Cougar Drive
Pueblo West, CO 81007
Phone (719) 529-0916
Fax (719) 766-8339
pfmconsultingcompany@gmail.com
www.pfmconsultingllc.com

PROOF OF PUBLICATION AFFIDAVIT

World Journal
508 Main St.
P. O. Box 346
Walsenburg, CO 81089

I, Brian Orr, of lawful age, being duly sworn upon oath, deposes and says that I am the Publisher of the World Journal, which has a general circulation therein: that the same is a weekly publication that is a "legal newspaper" as that phrase is defined in CRS § 24-70-103 for the Cities of Walsenburg and La Veta, for the County of Huerfano, for the City of Trinidad, for the County of Las Animas, both in the State of Colorado; and for the City of Raton, the County of Colfax, in the state of New Mexico; and has been published continuously and uninterruptedly in said counties and states for a period of more than one year and for more than fifty two consecutive weeks prior to the first publication of the annexed legal notice; that said newspaper has been admitted to the United States mail as a second class matter under the provisions of the Act of March 3, 1879, or any amendment thereto and that said newspaper is duly qualified to publish legal notices and advertisements within the meaning of the laws of the State of Colorado and State of New Mexico; and more particularly Chapter 109, Colorado Revised Statutes 1963 and amendments thereto; and Chapter 14, Article 11, Section 14-11-2, 2016 New Mexico Statutes, and amendments thereto; and that the attachment hereto contains a true and correct copy of what was actually published in said legal newspaper in consecutive issues on the following dates:

Public Notice 13 day of Feb. 2025

" / 20 day of Feb. 2025

" " 27 day of Feb. 2025

" " 06 day of Feb. 2025

____ day of 2025

Publication fee: \$

71.40

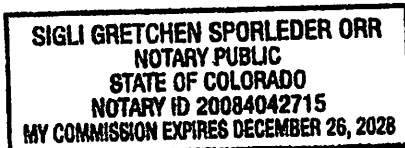
Brian Orr

Publisher, Huerfano Journal

.....
State of Colorado
County of Huerfano

Signed and sworn to before me this
by Brian Orr, Publisher.

6 day of March 2025.



Sigli Gretchen Sporleder Orr
Sigli Gretchen Sporleder Orr
Notary Public

My Commission expires: December 26, 2028. Commission # 20084042715

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 Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

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☐ Return Receipt (hardcopy) \$
☐ Return Receipt (electronic) \$
☐ Certified Mail Restricted Delivery \$
☐ Adult Signature Required \$
☐ Adult Signature Restricted Delivery \$

Postage
 \$

Total Postage and Fees **968**

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 Street and Apt. No., or PO Box No. **1127 Shuman Street**
 City, State, ZIP+4® **Durham, NC 27603**

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
 Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

OFFICIAL USE

Certified Mail Fee
 \$

Extra Services & Fees (check box, add fee as appropriate)
☐ Return Receipt (hardcopy) \$
☐ Return Receipt (electronic) \$
☐ Certified Mail Restricted Delivery \$
☐ Adult Signature Required \$
☐ Adult Signature Restricted Delivery \$

Postage
 \$

Total Postage and Fees **968**

Sent To **Paula Bizona**
 Street and Apt. No., or PO Box No. **2747 CR W**
 City, State, ZIP+4® **Rue, CO 81069**

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☐ Certified Mail Restricted Delivery \$
☐ Adult Signature Required \$
☐ Adult Signature Restricted Delivery \$

Postage
 \$

Total Postage and Fees **968**

Sent To **Reading**
 Street and Apt. No., or PO Box No. **PO Box 19078**
 City, State, ZIP+4® **Colorado City, CO 81019**

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

Complete items 1, 2, and 3.

Print your name and address on the reverse so that we can return the card to you.

Attach this card to the back of the mailpiece, or on the front if space permits.

Article Addressed to:

Paula Bezona
1747 Oak View
Rye, CO 81069



9590 9402 5705 9346 2691 27

Article Number (Transfer from service label)

7022 0410 0000 5536 1242

Form 3811, July 2015 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *Paula Bezona*

☐ Agent
☐ Addressee

B. Received by (Printed Name)

Paula Bezona

C. Date of Delivery

2/24/25

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

☐ Adult Signature
☐ Adult Signature Restricted Delivery
☐ Certified Mail®
☐ Certified Mail Restricted Delivery
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery
☐ Insured Mail

☐ Priority Mail Express®
☐ Registered Mail™
☐ Registered Mail Restricted Delivery
☐ Return Receipt for Merchandise
☐ Signature Confirmation™
☐ Signature Confirmation Restricted Delivery

Mail Restricted Delivery

Domestic Return Receipt

SENDER: COMPLETE THIS SECTION

Complete items 1, 2, and 3.

Print your name and address on the reverse so that we can return the card to you.

Attach this card to the back of the mailpiece, or on the front if space permits.

Article Addressed to:

Richard L. Reding
Box 19078
Colorado City, CO 81019



9590 9402 5705 9346 2691 34

Article Number (Transfer from service label)

022 0410 0000 5536 1259

Form 3811, July 2015 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *Richard L. Reding*

☐ Agent
☐ Addressee

B. Received by (Printed Name)

Richard L. Reding

C. Date of Delivery

02-15-2035

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

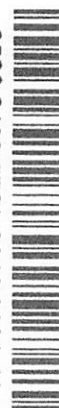
☐ Adult Signature
☐ Adult Signature Restricted Delivery
☐ Certified Mail®
☐ Certified Mail Restricted Delivery
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery
☐ Insured Mail

☐ Priority Mail Express®
☐ Registered Mail™
☐ Registered Mail Restricted Delivery
☐ Return Receipt for Merchandise
☐ Signature Confirmation™
☐ Signature Confirmation Restricted Delivery

Mail Restricted Delivery

Domestic Return Receipt

9590 9402 5705 9346 2691 41



Article Number (Transfer from service label)

Colorado State Land Board
1107 Sherman Street
Denver, CO 80203

1. Article Addressed to:
■ Complete items 1, 2, and 3.
■ Print your name and address on the reverse so that we can return the card to you.
■ Attach this card to the back of the mailpiece, or on the front if space permits.

3. Service Type
☐ Adult Signature
☐ Adult Signature Restricted Delivery
☐ Certified Mail®
☐ Certified Mail Restricted Delivery
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery
☐ Priority Mail Express®
☐ Registered Mail™
☐ Registered Mail Restricted Delivery
☐ Return Receipt for Merchandise
☐ Signature Confirmation™
☐ Signature Confirmation Restricted Delivery

A. Signature
X *Paula Bezona*
B. Received by (Printed Name)
C. Date of Delivery
2/19/25
D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No



April 21, 2025

Dear Customer,

The following is the proof-of-delivery for tracking number: 818287399472

Delivery Information:

Status:	Delivered	Delivered To:	Shipping/Receiving
Signed for by:	T.Bobian	Delivery Location:	
Service type:	FedEx Priority Overnight		
Special Handling:	Deliver Weekday		WALSENBURG, CO,
		Delivery date:	Apr 21, 2025 13:51

Shipping Information:

Tracking number:	818287399472	Ship Date:	Apr 18, 2025
		Weight:	
Recipient:		Shipper:	
WALSENBURG, CO, US,		PUEBLO, CO, US,	

FedEx Express proof-of-delivery details appear below; however, no signature is currently available for this shipment. Please check again later for a signature.

Thank you for choosing FedEx