PFM Consulting LLC

May 2nd, 2025

Colorado Division of Reclamation, Mining and Safety
1313 Sherman Street
Room 215
Denver, CO 80203

RE: Verhoeff Gravel Pit #1 M 2014-025 Technical Revision #1, Adequacy Review #1 Response

Ms. Armstrong,

Please find enclosed an updated Exhibit C Pre-Mining and Mining Plan and Exhibit F Reclamation Plan Maps per the Adequacy Review #1 request.

Additionally, the updated Mining Plan is enclosed for your review. The current, approved reclamation plan will remain in place with no revisions based upon this Technical Revision.

Below is the updated Reclamation Cost Bond Estimate as requested.

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Reclamation Costs

Reclamation cost estimates were calculated on a per acre basis and applied to maximum active mining area of 130 acres.

Direct Tasks	Unit	Quantity	Cost	Total Cost
Grading/Ripping Stockpile & Processing	Hours	10	$145.00	$1,450.00
Placing Topsoil/Fines				
Bull Dozer	Hours	10	$145.00	$1,450.00
Loader	Hours	10	$145.00	$1,450.00
Seeding				
Broadcasting	Hours	3	$300.00	$900.00
Seed Mix	Acre	1	$350.00	$350.00
Mulch	Acre	1	$187.50	$187.50
Tracking seed/mulch				
Dozer	Hours	3	$154.00	$462.00
Area Reclaimed	Acre	130		$232,290
Mobilization Fee	Hours	1	$5,000.00	$5,000.00
Indirect Tasks				
Liability Insurance			0.0155	$2,360.00
Performance Bond			0.015	$2,284.00
Profit			0.1	$15,232.00
Job Superintendent	Hours	20	$88.00	$1,760.00
Miscellaneous Indirect			0.0925	$14,089.00
Total Bond				$273,015.00

Sincerely,

Jodi Schreiber

Jodi Schreiber
Owner, PFM Consulting LLC

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6.4.4 Exhibit D
Mining Plan

The Verhoeff Gravel Pit will mine to a total depth of 25 feet. The target reserve is approximately 10-15 feet thick below approximately 10 feet of overburden. The primary commodity is gravel with secondary commodity of dirt. Overburden and fines will be retained on site for reclamation.

The life of the proposed operation is speculative due to fragile economic condition of the construction industry. If economic demand remains low and extraction is limited to less than 70,000 tons per year, approximately six acres per year will be mined. At this slow extraction rate, the life of the mine would extend to no less than 20 years. In the event demand for construction aggregate improves, the life of the mine is anticipated to be 12 to 15 years. Determination of the life of the mine is difficult.

The mine will develop in two phases with 120 acres in Phase 1 and 130 acres in Phase 2. The maximum proposed disturbance at any one time is 130 acres. Two phases will be delineated with boundaries transecting the property from north to south. Phase I will be the westernmost phase and mining will progress northward through the reserve. The life of each phase with low economic demand will be approximately 5-10 years. The size of each area to be worked would be the size of each phase delineated. Each phase would have various activities at any given time, including active mining, active reclamation activities, and final reclamation. The size of each activity is unknown, as various factors will determine the area of each activity. Reclamation success, stockpile needs based on specific job/economic conditions, etc. will dictate the size of the various activities. It is anticipated that as an area is mined out and stockpile and processing areas move with the active mine area, that section will be sloped to a 3H:1V and be prepped for topsoiling and seeding. The haul road to Phase 1 will not be moved until it is mined out. At that time, it will be reclaimed with the active mine areas and a new haul route will be established in Phase 2. The scale will not move during the life of the mine. The road will be approximately 30 feet wide and will be graveled.

Stockpiles will be utilized to control drainage and runoff. These stockpiles will encircle the active mine area and will change in size as the mine area size changes. These stockpiles of overburden and topsoil will then be used to reshape the mined out area and for final reclamation.

Earthmoving equipment will vary with mine development. Depending on depth of plant growth material and overburden, bulldozers and/or scrapers will be used to expose target reserve. Loaders will extract the gravel reserve and feed the processing plant. Bulldozers will maintain slopes and manage stockpiles when necessary. Reclamation will require bulldozers and graders to contour slopes and prepare surfaces for seeding.

The aggregate processing plant will move with the active mining phase. The processing plant will include portable crushers, screens and conveyors. A portable asphalt plant may operate on site in the processing area if required for a project. During initial development of Phase I, the processing plant will be located on ground surface. As the pit develops, the plant

will be located on the pit floor and will remain in the pit until the end of mining of Phase V. The control van will serve as operation center for employees. All interior haul roads will be temporary, reclaimed as mining progresses.

Mining products and byproducts stockpiles will be located within the bonded area of disturbance. The top ten (10) inches of soil suitable as plant growth medium will be salvaged and stockpiled for use during reclamation. Plant medium will be stockpiled in perimeter stockpiles and posted as reclamation topsoil. Waste rock, fines and overburden will be stockpiled and used to rebuild the pit floor and/or pit slopes concurrent with mining. During initial development of Phase I, stockpiles will be located on ground surface. As the pit develops, stockpiles will be moved to the pit floor, below ground surface. Perimeter stormwater berms will be constructed of overburden and fines as mining and reclamation progresses.

Reclamation will occur concurrently with mining. Slope grades will be maintained no greater than 3H:1V during mining. When areas are mined out, fines and overburden will be used to rebuild the pit floor and contour slopes as needed.

Setbacks are required for manmade structures owned by Lamar Light and Power, Southeastern Colorado Power Association, Bent County and Mr. Verhoeff. Bent County requested a 50-foot setback from the 60-foot ROW for County Road JJ. The transmission line owned by Lamar Light and Power traverses the north portion of the property. Transmission line poles will have a 75-foot radial setback and 50-foot easement where no mining will occur. The distribution line is located north of County Road JJ and will not be affected by mining. Mr. Verhoeff requested a 50-foot setback from fences and well structures. Water pipelines and corrals owned by Mr. Verhoeff may be relocated or replaced as needed during mining.

Groundwater is not expected to be exposed at this excavation elevation; therefore no impact to the hydrologic balance is anticipated. No acid or toxic producing materials will be exposed during mining. No explosives will be used in conjunction with mining or reclamation.

Comments received August 17, 2012 from Colorado State Historic Preservation Office (SHPO) indicate the southern portion of the subject property is located adjacent to a formally recognized segment of the Santa Fe Trail. As indicated in the mine plan map, the southern portion of the property is not included in the proposed affected area and this portion of the trail will be avoided. However, due to the meandering nature of historic trails there is a potential for associated features or artifacts to be present within the proposed affected area. In the event that an unidentified archaeological resource is identified during the mining operation, extraction will cease in the vicinity of the discovery and the SHPO will be immediately notified. Mining will resume in the vicinity of the discovery only upon receipt of SHPO approval.

Verhoff Pit
Mining Map Exhibit D

4/29/25

Map By James Higgs
All Right Paving & Redi-Mix

50' Setback

Site Access

Haul Road

Scales

50' Setback on Telephone Poles

50' Buffer from Well

25' Setback

Mining Direction

Mining Direction

Mining Direction

25' Setback

Permit Boundary

Current Mining Operations

Approximate Stockpile Overburden

Approximate Processing Area

Approximate Stockpile Area

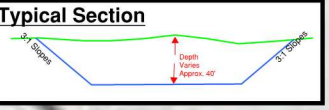
34

34

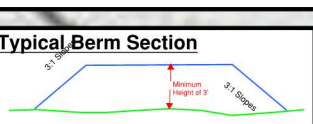
50' Buffer from Well

25' Setback

Typical Section



Typical Berm Section



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

Legend
- Permit Boundary (1,094 Acres)
- 10' Existing Contours
- Erosion Berm/Stockpile of Topsoil
- Stockpile of Overburden

N

2000 ft

Verhoff Pit
Mining Map Exhibit D.1 Phases

4/29/25
Map By James Higgs
All Right Paving & Redi-mix

Legend

- Permit 250 acres
- Phase 1
- Phase 2

Buffer on the North side is 50'

Phase 1

Phase 2

Buffer on the West, East and South sides are 25'

Google Earth
Image © 2025 Airbus

N

1000 ft

Verhoff Pit
Reclamation Map Exhibit E

Map By James Higgs
All Right Paving & Redi-M
4/29/25

50' Setback

Site Access

3921

Existing Overhead Power Line (SE Colorado Power Association)

3905

3900

50' Setback on Telephone Poles

50' Buffer from Well

25' Setback

25' Setback

Permit Boundary

3895

3890

3885

50' Buffer from Well

3880

3875

25' Setback

OLD

N

2000 ft

Notes:
1) All slopes to be reclaimed to a 3:1 or flatter
2) Contours are 5' intervals.

Typical Section