STATE OF COLORADO

Reilley - DNR, Robin <robin.reilley@state.co.us>

Kattenberg Pit TR2 Prelim ADQ and Draft RCE

1 message

Reilley - DNR, Robin <robin.reilley@state.co.us> Fri, Apr 25, 2025 at 11:25 AM
To: Ben Langenfeld <benl@lewicki.biz>, Robin Reilley - DNR <robin.reilley@state.co.us>

Good Morning Ben,

Please find DRMS's preliminary adequacy and draft reclamation cost estimate for Kattenberg Pit TR2. The decision date is 8 May 2025. There may be additional follow on adequacy questions pending your responses.

Thank you

Robin Reilley, M.S. GISP
Environmental Protection Specialist II

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Kattenberg Pitt M2004017_ADQ.pdf
267K

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

Ben Laganfeld
Lewicki and Associates

25 April 2025

RE: Kattenberg Pit M2004017
RMS Preliminary Adequacy Review of TR2

The Division has completed its preliminary review of Kattenberg Pit Technical Revision No. 2, TR2 received by the Division on 8 April 2025 via electronic submission. DRMS found the proposed revision complete on 21 April 2025. The proposed decision due date is 8 May 2025, 30 days from receipt of the application. Please submit responses to adequacy by 2 May 2025 in order to allow ample time for DRMS to review and respond.

Please see the Division's questions below regarding the applications compliance with the following Rules.

Rule 6.2.1 Maps

1. **All maps are illegible** as included in the submital, the font for all the call outs, legend etc. are too small. Please resubmit maps with a font size of 12 and address the following items.

a. The colors are either very light or the lines depicting boundaries are very fine rendering the information illegible.
b. The maps are draft and not signed by a registered PE or surveyor.
c. Date prepared;
d. Indicate the main entrance to the site showing the latitude and longitude of the entrance.
e. Topography,
f. "Plant site", also please describe in the text what the plant site comprises and its function.
g. Location of storage facilities for fuel and equipment oils, fuel tanks, fueling facility.

Rule 6.4.1 Legal Description

2. Exhibit D states that the permit area will be surveyed prior to site disturbance. Please provide an Exhibit A Legal description and address the following items:

a. identifying affected land, specify affected areas and be adequate to field locate the property. Description shall be by (a), township, range, and section, to at least the nearest quarter-quarter section and (b), location of the main entrance to the site reported as latitude and longitude, or the Universal Transverse Mercator (UTM) Grid with datum information as determined from a USGS topographic map.

Rule 6.4.4 Exhibit D Mining Plan

3. Please describe what the "plant site" referred to in the mine plan is. Include in the description what the structure is constructed of: concrete pad, building and building volume.
4. Concurrent reclamation is suggested in the mine plan timetable. Please provide a description of the size (acres) and location of each area to be worked during each phase and the sequence that each area will be worked if appropriate

It appears that 0.1 acre feet of groundwater will be exposed during the operation. Per these regulations your mining and reclamation plan must be protective of water rights and resources and the financial warranty must be adequate to complete reclamation including the protection of water resources.

5. Please assure the Exhibit C Map legibly shows the following:
   a. tributary water courses,
   b. wells, springs,
   c. stock water ponds,
   d. reservoirs, and ditches on the affected land
   e. and on adjacent lands where such structures may be affected by the proposed mining operations.

Per Division rules the following requirements and options are available to you:

- File a financial warranty ensuring backfilling of the pit to cover exposed groundwater to a depth of two feet above the static ground water level.
- Provide documentation of compliance with §37-90-137(11).

Bonding calculations should address the scenario best fitting the requirements of TR2.

- Procure a ground water well permit allowing exposure or temporary exposure of groundwater.
- Obtain a court approved augmentation plan prior to exposing ground water.

It appears in the application that a gravel well permit will be procured.

6. Name and describe the intended use of all expected incidental products to be mined/extracted by the proposed operation.
7. Please discuss the availability and storage of sand to absorb spills and show the location of sand storage.

Rule 6.4.5 Exhibit E Reclamation Plan

Reclamation plan calls for replacing topsoil to an average depth of 7 inches. However, in the application topsoil salvage is purported to be 4 inches.

8. Please explain and correct the discrepancy or inform DRMS where an additional 3 inches

of topsoil will be procured.

Reclamation Cost Estimate

9. Please provide Average push distance and gradient for backfill and grading to final condition.
10. Please provide a swell factor for excavated soils.
11. Will there be any debris to be removed from the site at reclamation? If so please describe in the text and task list of reclamation task estimate.
12. It appears that the seed mix has changed for the permit, the following seeds were omitted in the TR2 submital:
    - Arizona Fescue -Rodondo
    - Indian Ricegrass -Native

    Please confirm the seeding changes.

Upon receipt of adequate maps DRMS may have additional adequacy questions. The decision due date is 8 May 2025. Please have answers to adequacy by 2 May 2025 or before if possible. If you expect an extension may be helpful that can be arranged.

Sincerely,

Robin Reilley M.S. GISP
Environmental Protection Specialist II
Robin.reilley@state.co.us

COST SUMMARY WORK DRAFT

Task description:

Site: **Kattenberg Pit** Permit Action: TR2 Permit/Job#: M2004017

PROJECT IDENTIFICATION

Task #:	000	State:	Colorado	Abbreviation:	None
Date:	4/23/2025	County:	Grand	Filename:	M017-000
User:	RAR				

Agency or organization name: DRMS

TASK LIST (DIRECT COSTS)

Task	Description	Form Used	Fleet Size	Task Hours	Cost
023	Backfill 40,000 CY Inert Fill (Asphalt and Concrete)	DOZER	1	90.10	$28,978
024	Backfill 22,222 CY B/G FROM MINING TO FINAL CONDITION	DOZER	1	49.04	$15,771
054	Topsoil Replacement 7" - 33.9 Acres	SCRAPER1	1	29.60	$55,669
064	Final Grading - 33.39 Acres	GRADER	1	33.23	$5,382
073	Revegetate - 33.9 Acres	REVEGE	1	40.00	$80,168
	SUBTOTALS:			**241.97**	**$185,968**

INDIRECT COSTS

OVERHEAD AND PROFIT:

Liability insurance:	2.02	Total =	$3,757
Performance bond:	1.05	Total =	$1,953
Job superintendent:	120.99	Total =	$9,590
Profit:	10.00	Total =	$18,597
		TOTAL O & P =	$33,896
	CONTRACT AMOUNT (direct + O & P) =		$219,864

LEGAL - ENGINEERING - PROJECT MANAGEMENT:

Financial warranty processing (legal/related costs):	$500	Total =	$500
Engineering work and/or contract/bid preparation:	4.25	Total =	$9,344
Reclamation management and/or administration:	5.00		$10,993
CONTINGENCY:	0.00	Total =	$0
TOTAL INDIRECT COST =			$54,734
TOTAL BOND AMOUNT (direct + indirect) =			**$240,702**

BULLDOZER WORK

DRAFT

Task description: **Backfill 40,000 CY Inert Fill (Asphalt and Concrete)**

Site: **Kattenberg Pit** Permit Action: TR2 Permit/Job#: M2004017

PROJECT IDENTIFICATION

Task #: 023 State: Colorado Abbreviation: None
Date: 4/23/2025 County: Grand Filename: TR2
User: RAR

Agency or organization name: DRMS

HOURLY EQUIPMENT COST

Basic Machine: Cat D8T - 8SU
Horsepower: 310
Blade Type: Semi-Universal
Attachment: NA
Shift Basis: 1 per day
Data Source: (CRG)

Cost Breakdown:

		Utilization %
Ownership Cost/Hour:	$173.32	NA
Operating Cost/Hour:	$109.71	100
Ripper own. Cost/Hour:	$0.00	NA
Ripper op. Cost/Hour:	$0.00	0
Operator Cost/Hour:	$38.59	NA

Total unit Cost/Hour: $321.62
Total Fleet Cost/Hour: **$321.62**

MATERIAL QUANTITIES

Initial Volume: 40,000
Swell factor: 1.000
Loose volume: **40,000** LCY

Source of estimated volume: Division of Reclamation, Mining & Safety
Source of estimated swell factor: Cat Handbook

HOURLY PRODUCTION

Average push distance: 100 feet
Unadjusted hourly production: 852.6 LCY/hr

Materials consistency description: Loose stockpile 1.2

Average push gradient: 0 %
Average site altitude: 7,966 feet

Material weight: 3,300 lbs/LCY

Weight description: Decomposed rock - 75% Rock, 25% Earth

Job Condition Correction Factor Source

Operator Skill:	1.000	(EXCL.)
Material consistency:	1.200	(CAT HB)
Dozing method:	1.000	(GEN.)
Visibility:	1.000	(AVG.)
Job efficiency:	0.830	(1 SHIFT/DAY)
Spoil pile:	1.000	(DOZ-OC)
Push gradient:	1.000	(CAT HB)
Altitude:	1.000	(CAT HB)
Material Weight:	0.697	(CAT HB)
Blade type:	1.000	(PAT)

Net correction: 0.6942

Adjusted unit production: 591.87 LCY/hr

Adjusted fleet production: **591.87** LCY/hr

JOB TIME AND COST

Fleet size: 1 Dozer(s)
Unit cost: $0.543/LCY

Total job time: **67.58** Hours
Total job cost: **$21,736**

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