

May 7, 2025

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

**RE: Verhoeff Gravel Pit #1, File No. M-2014-025, Technical Revision (TR-1) Adequacy Review #2**

Ms. Schreiber:

The Division of Reclamation, Mining and Safety (Division) has completed its adequacy review #2 of your Technical Revision (TR-1) submitted for the Verhoeff Gravel Pit #1 located in Bent County. TR-1 purposes changing the approved mine phasing from 5 phases to 2 phases and increasing the allowable affected acreage to 100 acres. TR-1 was called complete on April 7, 2025. The extended decision date for TR-1 is currently set for May 21, 2025.

The Division's review consisted of comparing the TR-1 content with the requirements of the Mineral Rules and Regulations of the Colorado Mined Land Reclamation Board for the Extraction of Construction Materials. The Division has identified adequacy items requiring clarification or additional information. These items are identified below under their respective exhibit heading and are numbered sequentially.

**Exhibit C – Pre-Mining and Mining Plan Map(s) of Affected Lands (Rule 6.4.3):**

The following items are related to the map titled "Verhoff Pit Mining Map Exhibit D":

- 1) Please correct the map title with the following:
  - a. The Mining Plan Map for a 112c permit is Exhibit C, not Exhibit D which is currently on the title.
  - b. The Division's records show the site name for Permit No. M-2014-025 is "Verhoeff Gravel Pit #1", not "Verhoff Pit" which is currently on the title.
- 2) Please label Co Rd JJ and all other structures located on or within 200 feet of permit area and identify the respective owner(s).
- 3) Please specify which structure the proposed setback is associated with.
  - a. For example, the "50' setback" at top of map, does this correlate to the Co Rd JJ setback?
- 4) Correlating the setbacks on this map to the proposed Mining Plan, the following setbacks need to be corrected/clarified on the map:



- a. There should be a 75' radial setback surrounding the transmission line poles, but only the 50' easement is shown on the map.
  - b. The landowner requested 50' setbacks from any fences. Do the "25' setback" labels on the map correlate to the landowner's fences?
- 5) Please identify the proposed mine phases (1 and 2) on this map, as well as the approximate acreages associated with each (120 acres and 130 acres).
- 6) Please specify the acreage of the proposed haul road for phase 1 and ensure that it's included in the proposed maximum disturbance.
- 7) The current legend shows the permit boundary to include 1,094 acres. Please correct this to show the appropriate permit boundary of 250 acres.
- 8) In the Typical Section (bottom left of map) it says the pit "depth varies approx. 40 ft", but according to the Mining Plan, the maximum depth will be 25 ft. Please either revise the map or the Mining Plan to the correct maximum mining depth.
- 9) In #2 under Notes, it states "All slopes will be mined at a 3:1, except for the working face". In the Mining Plan, please specify the maximum "working face" at any time. The Division will use this information to calculate the slope backfill costs.

The following items are related to the map titled "Verhoeff Pit Mining Map Exhibit D.1 Phases":

- 10) Please correct the map title with the following:
  - a. The Mining Plan Map for a 112c permit is Exhibit C, not Exhibit D which is currently on the title. Also, the current "Exhibit D.1 Phases" title does not make sense given TR-1 is proposing 2 mining phases.
  - b. The Division's records show the site name for Permit No. M-2014-025 is "Verhoeff Gravel Pit #1", not "Verhoeff Pit" which is currently on the title.
- 11) Please add the respective acreages associated with each proposed mine phase. Additionally, please make sure the proposed haul road that crosses phase 2 is included in the maximum disturbed area (for phase 1 access).
- 12) Please show which portions of each phase will be disturbed. If all areas of each phase will be disturbed, the operator will need to submit an updated Reclamation Plan since the current plan shows the area north of the utility lines will not be mined.

**Exhibit D – Mining Plan (Rule 6.4.4):**

- 13) In the third paragraph, the newly proposed maximum disturbance is 130 acres, but the proposed acreage for phase 1 is 120 acres. Please clarify the following:

- a. The originally submitted TR-1 purposed increasing the allowable affected acreage to 100 acres. Please clarify if TR-1 is purposing to increase the maximum affected acreage to 100 acres or to 130 acres.
  - b. Is the operator proposing to disturb lands in both phase 1 and 2? If so, what kind of disturbance in each? For example, will all the 120 acres in phase 1 be disturbed, plus 10 acres in phase 2?
- 14) Please specify the acreage for the haul road leading into phase 1. Additionally, please specify if this acreage is included in the proposed maximum disturbance.
- 15) Please specify where the truck scale will be located onsite, as well as the truck scale dimensions.
- 16) The last sentence of the third paragraph of the Mining Plan states, "The road will be approximately 30 feet wide and will be graveled." Please clarify if this is related to the phase 1 haul road or the phase 2 haul road. Additionally, please provide the approximate length and gravel depth of the road.
- 17) The Division would like to remind the operator that all topsoil must be placed in an area where it will not be re-disturbed during operations for each mine phase. The operator cannot move topsoil without submitting and getting approval of a TR with the new location(s).
- 18) Specify where topsoil will be stored. Again, it must remain in a location where will not be re-disturbed by operations unless another TR is submitted and approved for it to move.
- 19) Please specify how the operator plans to stabilize the topsoil stockpiles, what seed mixture will be utilized, and after what length of time. This is generally after 6 months.
- 20) In the sixth paragraph, please clarify if the material processing will require washing. If so, how much water will be needed annually, and from which source(s). Additionally, please clarify if the operator will need a Substitute Water Supply Plan (SWSP) from the Division of Water Resources (DWR).
- 21) In the fifth sentence of the sixth paragraph where it says, "Phase V", please revise this since TR-1 is proposing only 2 mine phases.
- 22) In the eighth paragraph, it says slopes will be mined at a 3H:1V gradient. Please clarify if this is correct. If not, provide the maximum length of the active (steeper) highwall at any time that would require backfilling in a worst-case scenario.
- 23) Please clarify if the operator will have enough room along all highwalls to cut/fill slopes to 3H:1V. If not, the operator will need to backfill, which will increase reclamation costs.

**Exhibit E – Reclamation Plan (Rule 6.4.5):**

- 24) The proposed Reclamation Plan Map provided with the TR-1 items, shows that the operator will be making changes to the Reclamation Plan (ie. will have to reclaim mining north of utility line). Please provide an updated reclamation plan with the proposed changes if this is the case.

**Exhibit F – Reclamation Plan Map (Rule 6.4.6):**

The following items are related to the map titled “Verhoff Pit Reclamation Map Exhibit E”:

- 25) Please correct the map title with the following:
- a. The Reclamation Plan Map for a 112c permit is Exhibit F, not Exhibit E which is currently on the title.
  - b. The Division’s records show the site name for Permit No. M-2014-025 is “Verhoeff Gravel Pit #1”, not “Verhoff Pit” which is currently on the title.
- 26) Please provide a legend that labels and shows the symbols for:
- a. The permit boundary (dark blue line).
  - b. The light blue arrows and what these represent.
- 27) Please explain how the structure owners of the utility lines and the owner of the wells will continue to access their structures if the operator is planning to mine all around, leaving mounds around each pole or well. Especially if the pit will be 25 feet deep.
- a. Will the slopes around each structure be at a 3H:1V gradient and walkable/drivable?
  - b. The operator may need to provide an updated structure agreement with the structure owners demonstrating they are aware of the proposed mining and reclamation plans.
- 28) Please clarify if any access roads will remain after reclamation.
- 29) The Reclamation Plan Map needs to show approximate pit depth or elevations of reclaimed contour lines along the sides of the pit and along structure buffers.
- 30) The Typical Section (bottom left of map) shows 10" of overburden and 10" of topsoil will be placed on the entire pit disturbance. Please specify if this is correct. The 10" of overburden and topsoil is not mentioned in the proposed Mining Plan or approved Reclamation Plan (enclosed).
- a. The approved Reclamation Plan states overburden will be placed on the pit floor as quantity allows and a minimum 6 inches of topsoil will be spread

**Exhibit L – Reclamation Costs (Rule 6.4.12):**

- 31) The proposed Exhibit L states the maximum active mining area is 130 acres, the originally submitted TR-1 purposed increasing the allowable affected acreage to 100 acres. Please clarify if TR-1 is purposing to increase the maximum affected acreage to 100 acres or to 130 acres.
- a. The reclamation cost estimate needs to cover the maximum disturbance proposed.
- 32) Exhibit L needs to include the following:
- a. Acreages, volumes, and topsoil/backfill replacement depths for each applicable task.
  - b. The location for mobilization and demobilization of equipment.
- 33) Additionally, Exhibit L needs to include costs for demolition/removal of the truck scale and graveled road.
- a. The dimensions for the truck scale and the road were requested in the Mining Plan items. The road dimensions also need to include the approximate depth of gravel on the road to calculate volumes.

This concludes the Division's adequacy review #1 of TR-1. Please ensure the Division sufficient time to complete its review process by responding to these adequacy items no later than one week prior to the decision date, by **May 14, 2025**. If additional time is needed to respond, you must submit an extension request to our office prior to the decision date.

If you have any questions, you may contact me by telephone at 720-793-3031, or by email at [ursula.armstrong@state.co.us](mailto:ursula.armstrong@state.co.us).

Sincerely,



Ursula Armstrong  
Environmental Protection Specialist

Encls: 2014 Exhibit E - Reclamation Plan

Cc: John Ary, All-Rite Paving & Redi-Mix, Inc.  
Amy Eschberger, DRMS

## 6.4.5 Exhibit E Reclamation Plan

The site will be reclaimed to rangeland concurrently with mining in a rolling sequential fashion. As topsoil and waste rock/overburden are removed from a working face, they will be placed on slopes and floors of the previously mined out areas or stockpiled on the floor of the pit. Topsoil and waste rock/overburden stockpiles from the first working face will be used to reclaim the floor and slopes of previous disturbance.

Throughout mining, slopes will be maintained at 3H:1V minimum. Waste rock/overburden will be placed on the pit floor as quantity allows. A minimum of six (6) inches of topsoil will be placed on affected surfaces. If necessary, surfaces will be roughened prior to seeding. The slopes and pit floor will be seeded upon completion of waste rock/overburden and topsoil placement.

The operator will use the NRCS recommended and DRMS approved seed mix for the neighboring Verhoeff Pit to the west. If drill seeded, spacing will occur at seven to ten inch spacing intervals to a depth of ¼ to ½ inches. If broadcast seeded, 13.2 PLS lbs/acre will be placed. NRCS did not recommend mulch or soil amendments for the Verhoeff Pit and will not be used on this site unless NRCS communicates to the contrary. The seed mix is described in Table 1.

Table 1: NRCS Recommended Seed Mix

<b>Species</b>	<b>PLS/Acre</b>
Blue grama	0.6
Sideoats grama	2.3
Western wheatgrass	3.2
Sand dropseed	0.2
Yellow sweetclover	0.4

All mining structures will be reclaimed including the interior haul road and stormwater diversion structures. No ponds or streams are on site. All buildings are manufactured portable control vans and will be removed at the end of mining. No waste rock dumps, underground mine openings, or ditches are anticipated at the site.

### Plant Growth Medium Preservation:

Throughout the mining area, salvageable surface material will be removed with an excavator and stockpiled for use in final reclamation.

### Weed Control Plan

Upon commencement of reclamation, the area will be monitored for noxious weeds and implement appropriate methods to manage weed growth. Bent County Weed Control Program will be contacted for recommendations in the event noxious weeds develop.