

May 15, 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 #3

Ms. Schreiber:

The Division of Reclamation, Mining and Safety (Division) has completed its adequacy review #3 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 #1 Mining Map Exhibit C”:

- 1) Please correct the map title with the following:
 - a. The Division's records show the site name for Permit No. M-2014-025 is “Verhoeff Gravel Pit #1”, not “Verhoff Pit #1” which is currently on the title.
- 2) 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).

The following items are related to the map titled “Verhoff Pit #1 Mining Map Exhibit C.1 Phases”:

- 3) Please correct the map title with the following:
 - a. The current “Mining Map Exhibit C.1 Phases” title conflicts with the “Existing Conditions Map Exhibit C-1” title. Please revise one of the titles to differentiate these maps.
 - b. The Division's records show the site name for Permit No. M-2014-025 is “Verhoeff Gravel Pit #1”, not “Verhoff Pit #1” which is currently on the title.



- c. This map shows the 50 foot buffer to be maintained from the fencing along the perimeter of the site but does not show the other buffers. Please show all mining buffers on this map.

The following items are related to the map titled “Verhoff Pit #1 Existing Conditions Map Exhibit C-1”:

- 4) Please correct the map title with the following:
 - a. The current “Existing Conditions Map Exhibit C-1” title conflicts with the “Mining Map Exhibit C.1 Phases” title. Please revise one of the titles to differentiate these maps.
 - b. The Division’s records show the site name for Permit No. M-2014-025 is “Verhoeff Gravel Pit #1”, not “Verhoff Pit #1” which is currently on the title.
- 5) Please commit to submitting a Technical Revision to provide a revised mining plan map with all Phase 2 information and an updated bond estimate prior to disturbing land outside of the Phase 1 area (other than the access road and scale area).

Exhibit D – Mining Plan (Rule 6.4.4):

- 6) In the third paragraph, the newly proposed maximum disturbance is 130 acres, but the proposed acreage for Phase 1 is 120 acres. The maximum disturbance will be associated with the required financial warranty and the Division’s cost estimate. If TR-1 is only proposing to disturb Phase 1, the maximum disturbance will be the 120 acres plus the acreage for the existing haul road and scale area. Please clarify the following:
 - a. Please clarify if TR-1 is proposing to increase the maximum disturbed acreage to include only Phase 1 (120 acres) plus the acreage for the existing access road and scale area (in Phase 2). If this is the case, please provide the acreages for the access road and scale area and an updated total disturbance amount which includes this acreage. Based on the information provided, the Division believes the operator is proposing to be bonded for mining only Phase 1 at this time, and for disturbing the portions of Phase 2 used for the access road and scale area. Therefore, the maximum disturbed area would be more than 120 acres (Phase 1), but likely less than 130 acres since the existing access road and scale area appear to cover less than 10 acres. However, additional clarification from the operator is needed.
- 7) The last sentence of the third paragraph of the Mining Plan states, “The road will be approximately 30 feet wide and will be graveled.”
 - a. Item #16 of the operator’s adequacy response #2 stated the road could be a maximum of 4,500 feet into Phase 2. If TR-1 is only proposing to be bonded for Phase 1 plus the existing access road and scale area, the Division only needs the maximum length of the road for Phase 1. Please provide the approximate length of the access road for Phase 1.

Exhibit F – Reclamation Plan Map (Rule 6.4.6):

The following items are related to the map titled “Verhoff Pit #1 Reclamation Map Exhibit F”:

- 8) Please correct the map title with the following:
- a. The Division’s records show the site name for Permit No. M-2014-025 is “Verhoeff Gravel Pit #1”, not “Verhoff Pit #1” which is currently on the title.

Exhibit L – Reclamation Costs (Rule 6.4.12):

- 9) The Reclamation Costs provided state the maximum active mining area is 130 acres, which would correspond with the proposed Phase 2 acreage. However, as mentioned above, the Division believes the operator is proposing to be bonded only for mining Phase 1 and disturbing Phase 2 with the existing access road and scale area. The maximum disturbed area (and associated bond estimate) must include all planned disturbances to the land surface by the mining operation. This includes the access road and scale area.
- a. The reclamation cost estimate needs to cover the maximum disturbance proposed. Please ensure all reclamation tasks in the Reclamation Costs reflect the proposed maximum disturbance.
- 10) The following reclamation tasks must be added to the Reclamation Costs:
- a. Grading the proposed 150 foot long, 25 foot tall active pit slope to 3H:1V.
 - b. Reclamation of the gravel access road and the truck scale area.

This concludes the Division’s adequacy review #3 of TR-1. Please ensure the Division sufficient time to complete its review process by responding to these adequacy items prior to the decision date, by **May 19, 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.

Sincerely,



Ursula Armstrong
Environmental Protection Specialist

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