

STATE OF  
COLORADO

Reilley - DNR, Robin &lt;robin.reilley@state.co.us&gt;

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**Re: ADQ Prelim Kattenberg Pit**

1 message

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**Ben Langenfeld** <benl@lewicki.biz>  
To: "Reilley - DNR, Robin" <robin.reilley@state.co.us>

Fri, May 16, 2025 at 5:08 PM

Robin

The attached PDF is the adequacy response. Please keep in mind the maps are meant to be printed as 22 x 34 sheets, so they will not be legible as 8.5x11.

I am also sending a REDLINE word document so you can see where I edited the exhibits. Please only use the REDLINE for your review, not for the public file.

-Ben Langenfeld  
Lewicki and Associates  
[benl@lewicki.biz](mailto:benl@lewicki.biz)  
[3375 W Powers Circle](#)  
Littleton, CO 80123  
(720) 842-5321, ex. 1  
(303) 960-5613

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**From:** Reilley - DNR, Robin <[robin.reilley@state.co.us](mailto:robin.reilley@state.co.us)>  
**Sent:** Friday, April 25, 2025 8:29 AM  
**To:** Ben Langenfeld <[benl@lewicki.biz](mailto:benl@lewicki.biz)>; Robin Reilley - DNR <[robin.reilley@state.co.us](mailto:robin.reilley@state.co.us)>  
**Subject:** ADQ Prelim Kattenberg Pit

Good Morning Ben,

Please find DRMS's preliminary adequacy 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

image.png

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F [303.832.8106](tel:303.832.8106)

Physical Address: [1313 Sherman Street St., Suite 215, Denver, CO 80203](#)  
Mailing Address: DRMS Room 215, [1001 E 62nd Ave, Denver, CO 80216](#)  
[robin.reilley@state.co.us](mailto:robin.reilley@state.co.us) | <http://mining.state.co.us>

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**2 attachments****Kattenburg Pit TR Adeq1 RESPONSE.pdf**  
5266K

May 8, 2025

Colorado Division of Reclamation, Mining, and Safety  
1313 Sherman St, Rm 215  
Denver, CO 80203

**RE: Kattenburg Pit M-2004-017**  
**Technical Revision – Updates to Mining and Reclamation Plans**  
**Adequacy Response**

Ms. Reilley

Attached is a response to your adequacy review of TR02 for the Kattenburg Pit. Each section is addressed and revised maps and exhibits are included as necessary.

Regards,



Ben Langenfeld, P.E.  
Lewicki & Associates, PLLC  
(720) 842-5321, ex. 1  
[benl@lewicki.biz](mailto:benl@lewicki.biz)

## Rule 6.2.1 Maps

Revised maps are attached.

## Rule 6.4.1 Legal Description

See the attached Exhibit A.

## Rule 6.4.4 Exhibit D Mining Plan

The reference to portable plants has been clarified in Exhibit D.

The mining operation will proceed outward first and then downward, as described in the mining plan. It is not phased in any manner. Each slice of mining, as it proceeds downward, will maintain a variable disturbance area that will always be less than the final disturbance area when mining reaches the bottom. For this reason, the bond is based on the final disturbance area, since it is the greatest. A diagram has been added to Exhibit D to make the mining sequence clearer.

Maximum active highwall dimensions are listed in Exhibit D as well.

At the end of mining, no groundwater exposure will exist, as shown on Map F-1.

## Rule 6.4.5 Exhibit E Reclamation Plan

The topsoil thickness discrepancy has been corrected in both the mining and reclamation plan.

The seed mix shown in TR02 is correct.

## Reclamation Cost Estimate

Please see the revised Exhibit L.

# Attachments

Exhibit A – Legal Description

Exhibit C –

Map C-1A Current Conditions

Map C-2 Mining Plan

Map C-3 Cross Sections

Exhibit D – Mining Plan

Exhibit E – Reclamation Plan

Exhibit F –

Map F-1 Reclamation Plan

Exhibit G – Water Information

Exhibit L – Reclamation Costs

## Exhibit A

## Legal Description

A parcel of land located in the SE1/4 of the SE1/4 of Section 33, T2N, R76W, of the 6<sup>th</sup> PM, in Grand County, Colorado. More particularly described as follows: with the south section line of Section 33 have a basis of bearing of N 88° 18' 13" W, the point of beginning is the southeast corner of Section 33;

Thence, S 01° 53' 45" E for a distance of 605.0 feet to a point on a line.

Thence, N 88° 18' 13" W for a distance of 1317.5 feet to a point on a line.

Thence, N 88° 18' 08" W for a distance of 320.9 feet to a point on a line.

Thence, N 00° 46' 58" W for a distance of 60.9 feet to a point on a line.

Thence, N 49° 01' 50" E for a distance of 164.8 feet to a point on a line.

Thence, N 38° 22' 00" W for a distance of 34.8 feet to a point on a line.

Thence, N 09° 50' 36" E for a distance of 119.9 feet to a point on a line.

Thence, N 22° 17' 03" E for a distance of 97.8 feet to a point on a line.

Thence, N 33° 55' 49" E for a distance of 72.7 feet to a point on a line.

Thence, N 14° 43' 01" E for a distance of 67.5 feet to a point on a line.

Thence, N 31° 52' 20" E for a distance of 109.0 feet to a point on a line.

Thence, N 41° 24' 49" E for a distance of 243.1 feet to a point on a line.

Thence, N 13° 27' 40" E for a distance of 438.9 feet to a point on a line.

Thence, N 54° 55' 05" E for a distance of 125.0 feet to a point on a line.

Thence, N 89° 19' 44" E for a distance of 18.8 feet to a point on a line.

Thence, S 88° 12' 56" E for a distance of 40.9 feet to a point on a line.

Thence, S 89° 32' 54" E for a distance of 616.4 feet to a point on a line.

Thence, S 78° 01' 39" E for a distance of 307.7 feet to a point on a line.

Thence, S 00° 00' 00" W for a distance of 35.6 feet to a point on a line.

Thence S 00° 01' 56" E a distance of 642.4 feet to the point of beginning for a total of 38.65 acres, more or less.

The location of the mine entrance is at: Latitude: 40.0863°, & Longitude: -105.9047°



LEGEND

BOUNDARIES

DRMS Permit Boundary

Incorporated city or equivalent

BUILDINGS AND RELATED STRUCTURES

Building

Fence

LAND SURVEYS

Public Land Survey System

Range or Township line

Range or Township labels

Section line

Section numbers

Property boundary

Mining claim

ROADS AND RELATED FEATURES

Highway

Light duty road, paved

Light duty road, gravel

RIVERS, LAKES, SHORELINES, AND CANALS

Perennial stream/ditch

Perennial river

Intermittent stream/ditch

Perennial lake/pond

Intermittent lake/pond

Wells

Drainage direction

VEGETATION

Rangeland

TRANSMISSION LINES AND PIPELINES

Power transmission line; pole; tower

Telephone/data line, buried

BASELINE CONTOURS

Index

Intermediate

Drainage Basin Labels

Basin

Area

Composite Runoff Coefficient

Basin Destination

C-1A Current Conditions

Kattenberg Pit

DRMS Permit Number: M-2004-017

United Companies

Mine Entry Location:

Latitude: 40.0863

Longitude: -105.9047

State: CO

County: Grand

Nearest Town: Granby

Section: 33

Township: 2N

Range: 76W

PM: 6th

Major Watershed:

Colorado River

MSHA ID: N/A

Map Scale: 1"=100'

0

100

200

N

Map Georeferencing Information:

Datum: NAD83

Projection: CO NORTH

Survey Source: Drone

Imagery Source:Google

Survey Date: 10/2022

Imagery Date: 2019

Drawn by: BEL

Checked by: BEL

Approved by: BEL

Date: 05/08/25

Date: 05/10/25

Date: 05/10/25

File Name: Kattenberg 250508

L

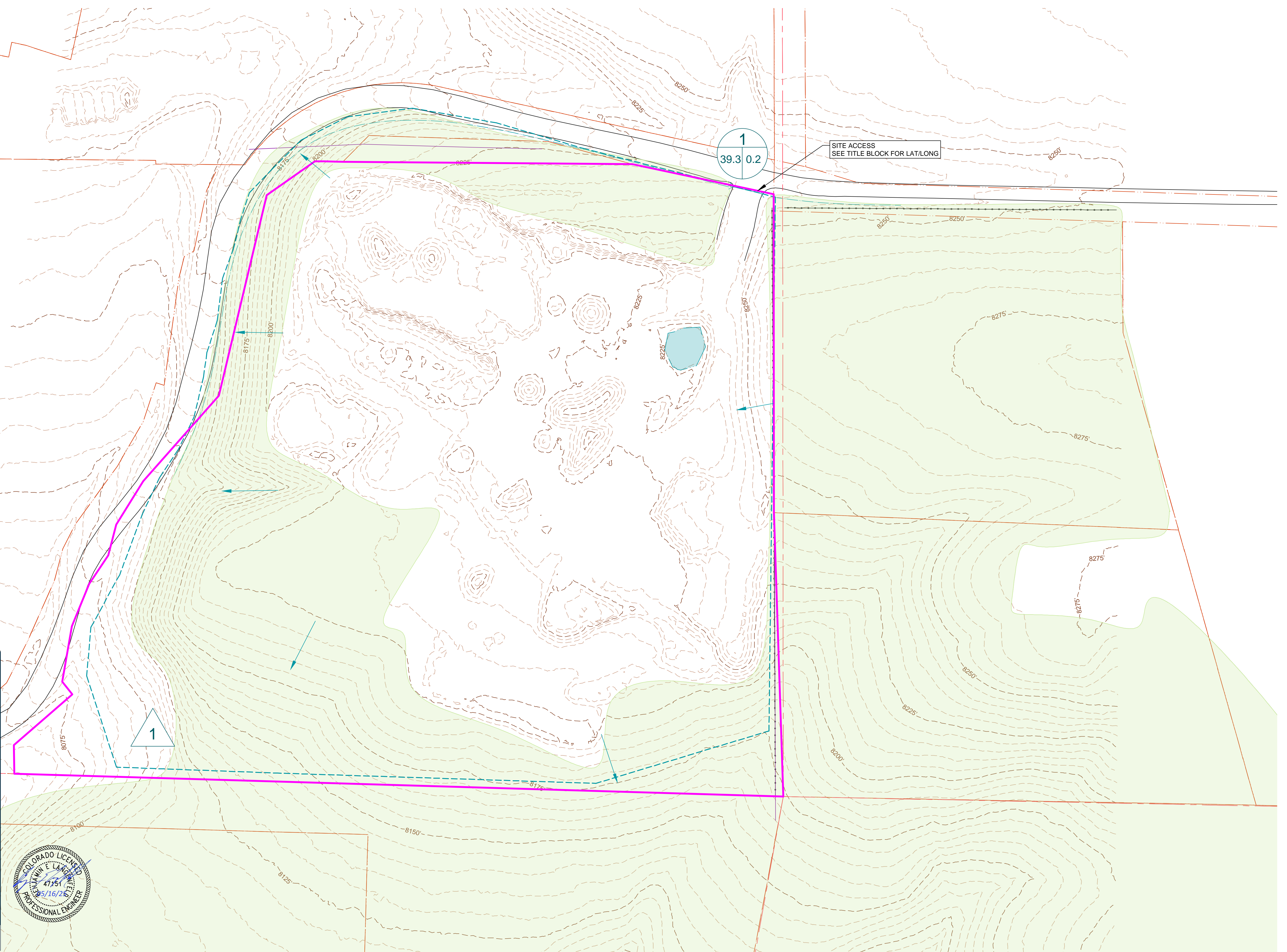
Lewicki & Associates

3378 West Powers Circle

Littleton, CO USA 80123

(303)-346-5196

info@lewicki.biz





LEGEND

BOUNDARIES

DRMS Permit Boundary

Incorporated city or equivalent

BUILDINGS AND RELATED STRUCTURES

Building

Fence

LAND SURVEYS

Public Land Survey System

Range or Township line

Range or Township labels

Section line

Section numbers

Property boundary

Mining claim

ROADS AND RELATED FEATURES

Highway

Light duty road, paved

Light duty road, gravel

MINING FEATURES

Mining Facilities

Berm/windrow

Disturbed Area

RIVERS, LAKES, SHORELINES, AND CANALS

Perennial stream/ditch

Perennial river

Intermittent stream/ditch

Perennial lake/pond

Intermittent lake/pond

Wells

Drainage direction

TRANSMISSION LINES AND PIPELINES

Power transmission line; pole; tower

Telephone/data line, buried

BASELINE CONTOURS

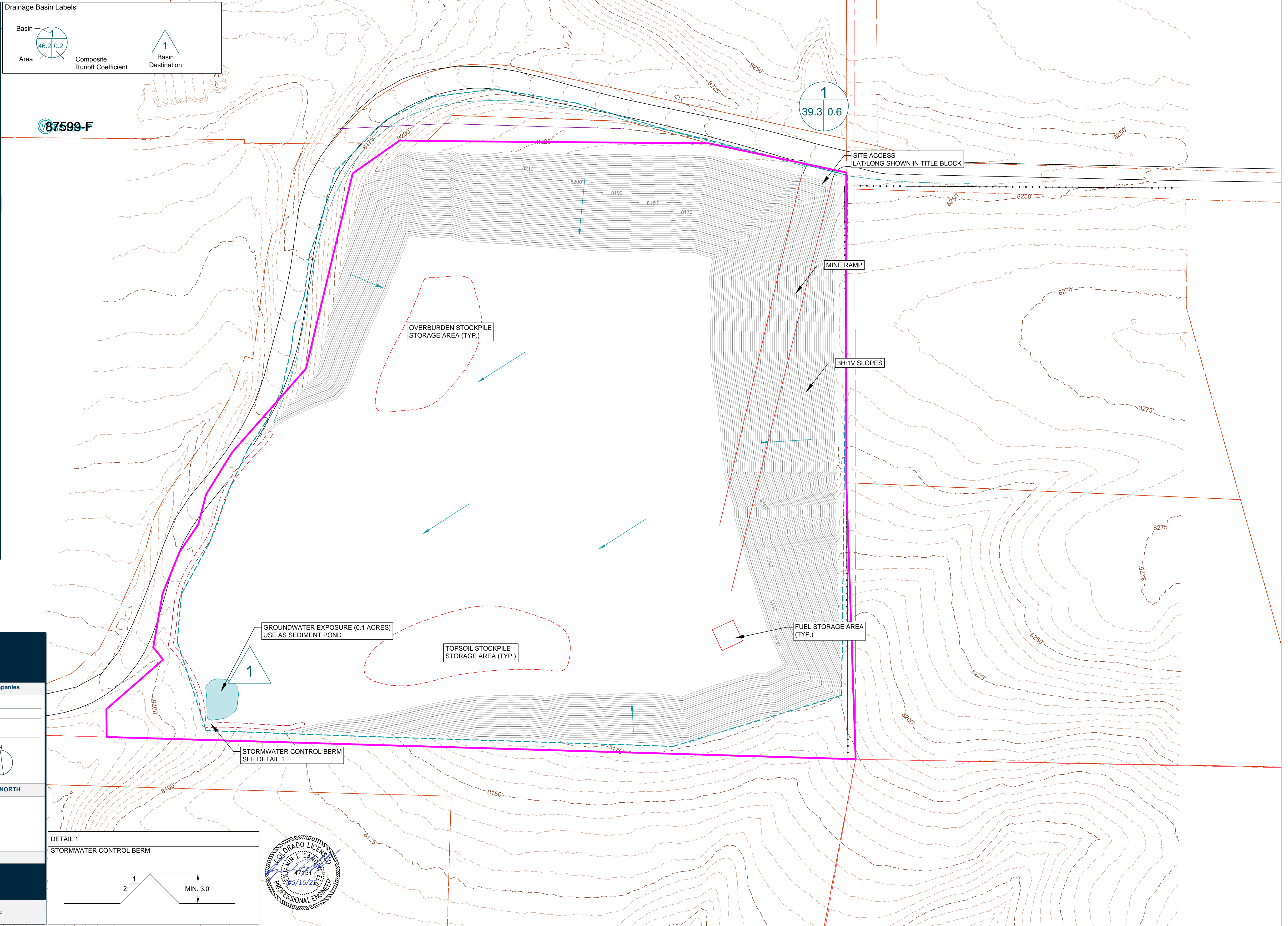
Index

Intermediate

POST-MINING CONTOURS

Index

Intermediate





LEGEND

BOUNDARIES

DRMS Permit Boundary  
Incorporated city or equivalent

BUILDINGS AND RELATED STRUCTURES

Building  
Fence

ROADS AND RELATED FEATURES

Highway  
Light duty road, paved  
Light duty road, gravel

RIVERS, LAKES, SHORELINES, AND CANALS

Perennial stream/ditch  
Perennial river  
Intermittent stream/ditch  
Perennial lake/pond  
Intermittent lake/pond  
Drainage direction

MINING FEATURES

Mining Facilities  
Disturbed Area

TRANSMISSION LINES AND PIPELINES

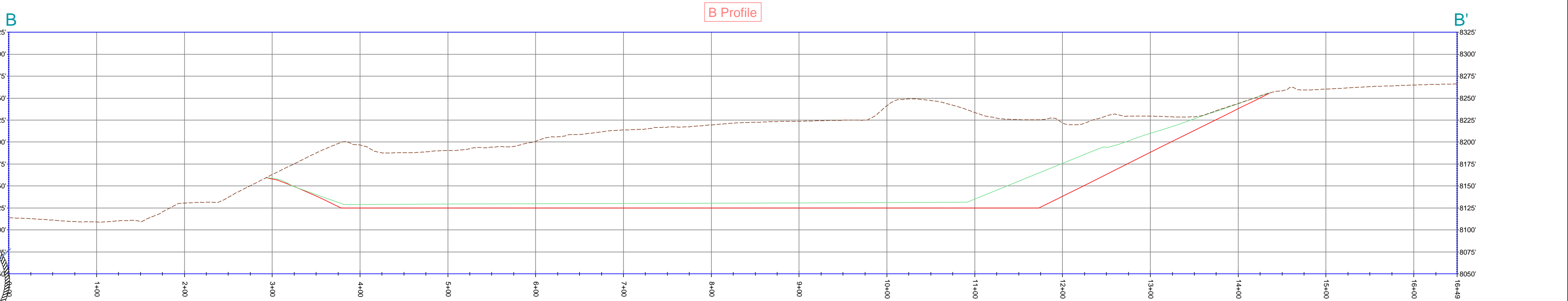
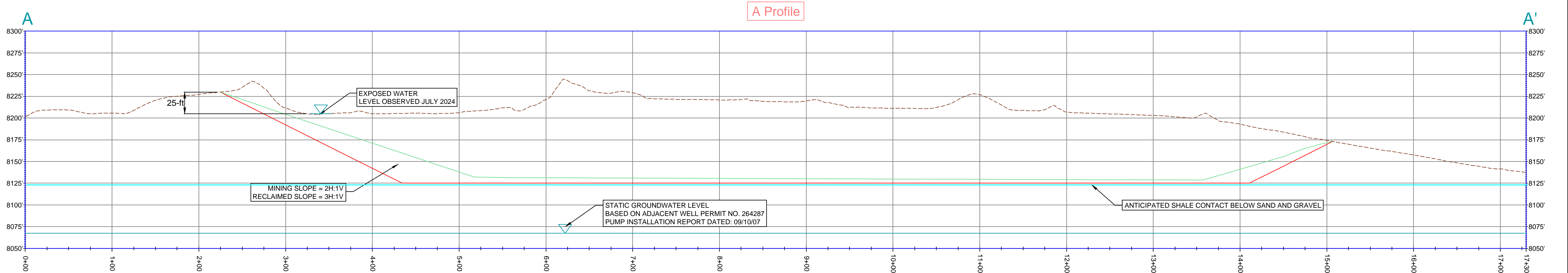
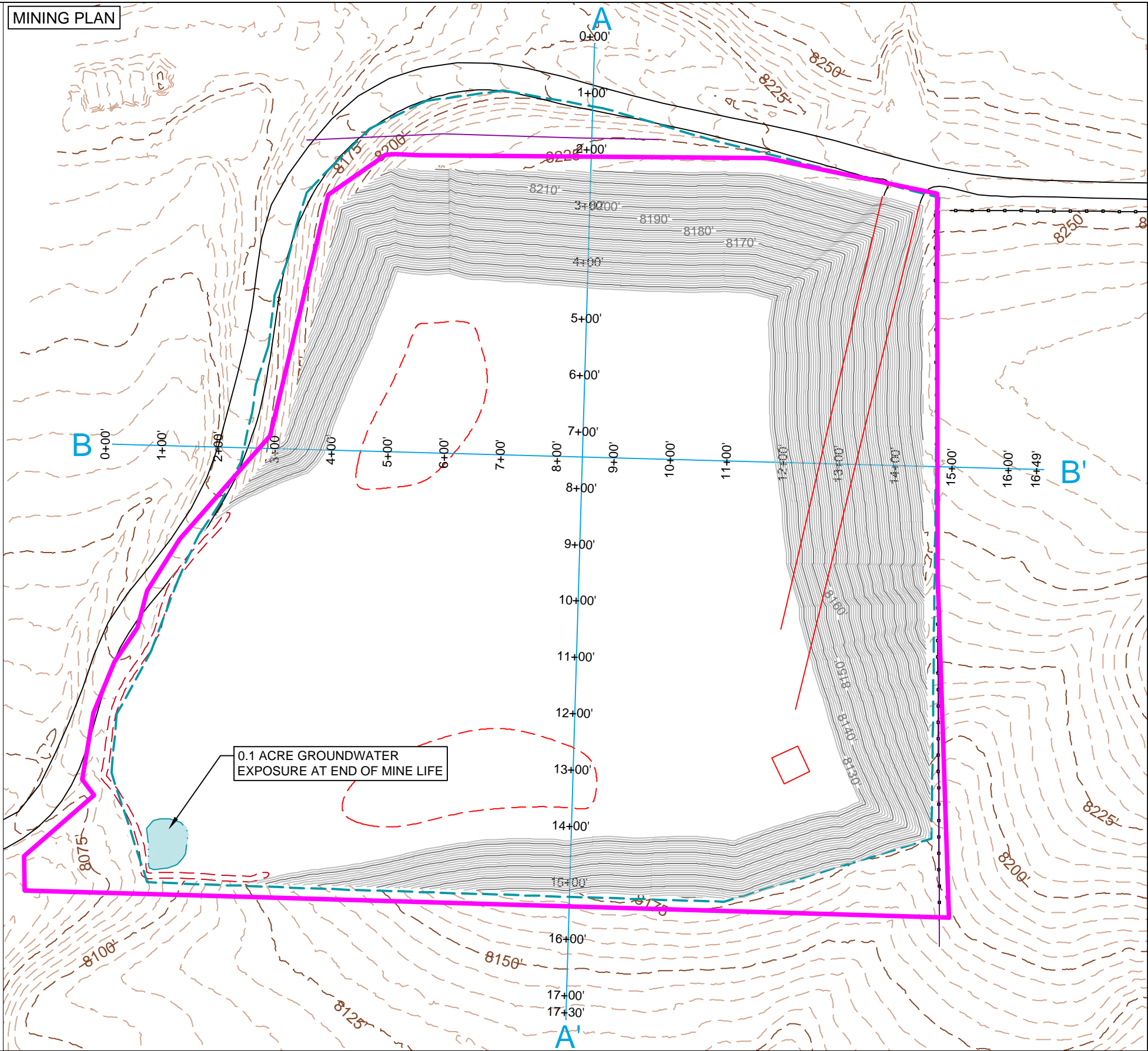
Power transmission line; pole; tower  
Telephone/data line, above ground

BASELINE CONTOURS

Index  
Intermediate

POST-MINING CONTOURS

Index  
Intermediate  
Baseline Topography  
Mining Topography  
Reclaimed Topography



C-3 Cross Sections

Kattenberg Pit

DRMS Permit Number: M-2004-017

United Companies

Mine Entry Location:

Latitude: 40.0863  
State: CO  
Section: 33  
Major Watershed: Colorado River  
Map Scale: 1":70

Longitude: -105.9047  
County: Grand  
Township: 2N  
Range: 76W  
Colorado River  
MSHA ID: N/A

Nearest Town: Granby  
PM: 6th

0 70 140

N

Map Georeferencing Information:

Datum: NAD83

Projection: CO NORTH

Survey Source: Drone  
Imagery Source: Google  
Survey Date: 10/2022  
Imagery Date: 2019

Drawn by: BEL  
Checked by: BEL  
Approved by: BEL

Date: 05/08/25  
Date: 05/10/25  
Date: 05/10/25

File Name: Kattenberg 250508

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# EXHIBIT D

# MINING PLAN

## 1. General Mining Plan

The mining operation is located in Grand County approximately 1.25 miles east of Granby, Colorado on 38.65 acres north of the Fraser River and east of County Road 60. The property boundary has been surveyed and the permit area will be surveyed prior to any site disturbance.

### 1.1. Mining Method

Mining will be conducted using excavators, trucks, and bulldozers. Crushing and screening may take place on the site. Mining is proceeding principally vertically, working downward into the deposit. Full mining extents are shown on Map C-2. Map C-3 shows cross sections of the site.

### 1.2. Equipment List and Usage

Mining operations utilize:

- Two to three front-end loaders for material handling
- Motor graders for road maintenance
- Bulldozers for stripping and grading
- Tractor trailers and tandem-axle end dumps
- Articulated haul trucks for material movement
- Water trucks for dust control
- Portable screening plants (wet and dry)
- Portable conveyors and crushers
- Fuel storage (including spill kits)

### 1.3. Slope Specifications

All mining faces will maintain specific slope requirements throughout operations. During active mining, working faces may be maintained at 0.5H:1V. Interim slopes within the mining area may be maintained at 2H:1V, but at no more than 750-feet of length and no more than 20-ft of height. The final reclaimed slopes will be graded to a maximum gradient of 3H:1V to ensure long-term stability.

## 2. Description of the Deposit

The site contains a Pleistocene age, Slocum alluvial terrace deposit that averages 100+ feet deep across the property. The deposit consists of approximately 80% rock to 20% sand

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composition with intermixed large boulders. The material is overlain by soil ranging from 0-8 inches, averaging 6 inches, with underlying clayey, sandy, loamy overburden of 24-60 inches depth. The deposit consists of colluvium and glacial till lying on top of Pierre Shale bedrock. The underlying shale beds strike at N87°W and dip 8° NE in the vicinity of the pit. Bedrock outcrops in the southwest corner of the property, where a spring occurs, at an approximate elevation of 8110 feet. Depths of gravel have been confirmed to an elevation of 8125 in the west-central part of the deposit and can be easily inferred to depths greater than the proposed ultimate pit depth.

All sand and gravel mined at the Kattenburg Pit will be used in the production of construction materials in the Grand County market.

### 3. Description of the Size of the Area to be Worked at Any One Time

The operation encompasses a total area of 38.65 acres, with 33.39 acres designated for active mining and 5.26 acres reserved for undisturbed setback areas. The maximum disturbed area at any time will be 33.39 acres.

#### 3.1. Mining Sequence

Mining will begin in the central part of the property near the old mine where a plants such as crusher/screener will be established. Mining will then advance outward at an elevation intended to create a 20-foot face. The mining will progress into the hillside at this level until the exterior slope area is reached. Once the deposit has been mined at this starting elevation, mining will progress downward in 20-foot increments. In effect, the deposit will be mined in 20-ft tall slices from the top down. Figure D-1 shows a diagram of this sequence. The shape of the deposit is such that the maximum disturbance area, or the largest slice, will be at the bottom. This is near the end of the mine life and is the basis for the reclamation bond (Exhibit L).

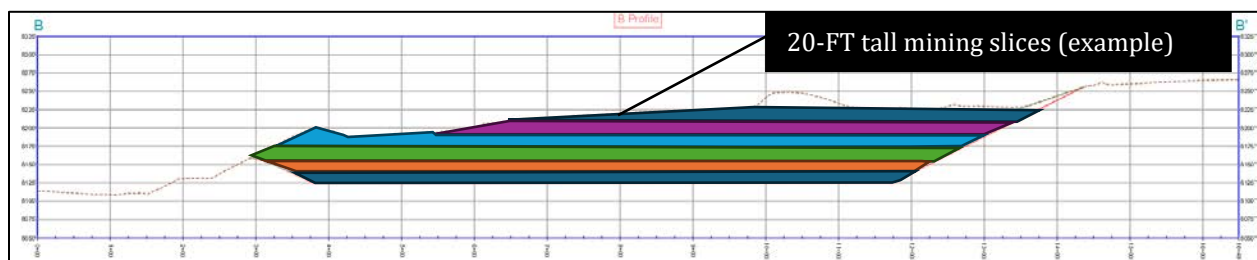


Figure D-1. Mining Sequence Diagram



## 4. Description of Water Management Procedures

### 4.1. Surface Water Controls

Stormwater management includes maintaining pit-ward attitude on all slopes and installing isolation ditches around the pit perimeter as shown on Map C-2. Sediment control basins are established on site, with comprehensive erosion control measures implemented for all disturbed areas.

Drainage patterns maintain natural flows where possible while implementing specific controls around stockpiles and operational areas. The groundwater exposure will be used as a stormwater pond for water management, with regular monitoring and maintenance of all water control structures.

### 4.2. Groundwater Management

Mining operations will expose approximately 0.1 acres of groundwater. This exposure is permitted under Substitute Water Supply Plan (SWSP) WDID 1407801. All groundwater management activities will be conducted in accordance with this permit's requirements and conditions. A gravel well permit will be maintained for the operation throughout its life. The groundwater exposure will always exist at the low point of the operation. Once mining has reached full depth, this exposure is expected to be at the southwest corner of the pit, at the lowest elevation of the operation.

### 4.3. Water Quality Procedures

Each pit serves as a sediment pond for operations. All interior pit slopes will be maintained with a pit-ward attitude so that there will be no drainage off the affected land. No water will be discharged from the pit without a National Pollutant Discharge Elimination System (NPDES) Permit that will address any discharges associated with the mining operation or Stormwater as required by law.

## 5. Mining Timetable

The total permit duration is planned for 10-15 years, of which 13 years will be mining. This is based on an average annual production of 250,000 tons per year. Market forces will determine the actual production level and thus this timetable is an estimate.

**Table D-1 Mining Timetable**

Stage	Description	Mining Time	
1	Establish access roads and facilities shown on Map C-2. Begin topsoil and overburden removal. Initiate mining.	4	Years
2	Advance mining down and southward while conducting concurrent reclamation. Processing and sales of materials from the site.	8	Years
3	Complete mining and finalize slopes for reclamation.	2	Years
<b>Total</b>		<b>14</b>	<b>Years</b>

The mining schedule is planned to minimize disturbance by reclaiming areas as additional mining is undertaken. Note: If large contracts are awarded to the site, production could increase to the permit maximum, thereby curtailing the life of the pit. On the other hand, if contracts are less than anticipated, the life of the pit could be extended. This table is based on a reasonable projection of average production rates.

The deposit thickness will lead to mining in 20-ft slices as through the deposit vertically.

## 6. Description of the Method of Handling Materials

Topsoil and overburden will be handled onsite. Both will be stripped, placed, and stockpiled as needed. Any topsoil or overburden stockpile that is to be in place longer than 180 days will be vegetated to prevent wind erosion.

### 6.1. Topsoil Management

Mining extraction begins with stripping and stockpiling topsoil separately from other materials. Materials are stored in designated areas shown on Map C-2 for future reclamation. Stockpiles planned for storage longer than one year receive temporary seeding for protection. An average 6-inches of topsoil will be stripped. The stripped topsoil will be placed directly on regraded slopes for reclamation as frequently as possible. An estimated 32,000 CY of topsoil will be stripped and replaced as part of mining and reclamation.

### 6.2. Overburden Handling

Overburden is removed using scrapers and dozers, maintaining separate stockpiles from topsoil. The material is stored for use in concurrent and final reclamation activities. Roughly 24-60 inches of overburden will be stripped during mining. The exact thickness will vary by location. Overburden will be placed in mined out areas for reclamation grading as frequently as possible. An estimated 160,00 CY of overburden will be stripped and backfilled as part of mining and reclamation.



### 6.3. Hazardous Materials Management

The only hazardous materials stored onsite during operations will be fuel and equipment oils. All fuel tanks will have secondary containment. Some are double walled, others will be located within bermed or lined areas that have over 110% of the volume of the largest stored tank. If fuel is stored on the site a small containment berm will be placed around the fueling facility to keep any spills contained. The size of the berm will be engineered to contain the amount of fuel stored in the area. Spill kits will be maintained in the fuel storage area including sufficient absorbent material for spills. The site will maintain Spill Prevention, Control, and Countermeasure plan (SPCC Plan) for fuel and oil storage. Fuel storage location(s) are identified on Map C-2.

No acid or toxic forming materials will be mined or processed as part of the operation.

## 7. Water Information, Rights and Augmentation

All water rights issues such as availability of water for this operation, consumption rates, dust control, etc. is presented in Exhibit G - Water Information.

## 8. Description of Wildlife Protection Measures

The site is used by various wildlife species. Measures to protect wildlife include limiting disturbance areas to the minimum necessary and concurrent reclamation of mined areas. The Division of Wildlife letter in Exhibit H was prepared at our request to identify potential wildlife issues. Our planning takes this into account and the report does not raise issues regarding endangered or threatened species.

# EXHIBIT E

# RECLAMATION PLAN

## 1. General Reclamation Plan

The reclamation plan encompasses the following areas as shown on Map F-1 and outlined in Table E-1.

The slopes will be shaped to the setback distances and will be ready for soiling and planting as mining reaches the outer limits. Along the property line the setback will be 25 feet; on the ROW the setback will be 15 feet. Slopes will be mined to final configuration at the setbacks.

**Table E-1 Reclaimed Areas**

Post Mine Land Use	Area (acres)
Dry rangeland	33.39
Undisturbed	5.3
<b>Total Permit</b>	<b>38.65</b>

## 2. Description of Topsoil Management

Topsoil salvage operations maintain soil structure throughout the handling process. Storage specifications limit stockpile heights to 15 feet with side slopes maintained at 3H:1V or flatter to ensure stability. Sufficient quantities of soil will be available to reclaim the disturbed lands to their present condition. The soils salvaged and replaced will represent what is there now.

Prior to topsoil replacement, the subsurface is ripped or scarified to ensure proper bonding between materials. Topsoil is replaced to an average depth of 6-inches across reclaimed areas as shown on Map F-1, with careful attention to avoiding compaction during placement. The topsoil stockpiles will be located on the pit floor to reduce the haul distances when reclamation starts.

All final reclamation slopes will be 3H:1V or shallower.

An internal road will be left in place for the property owner to access and use the site following mining. The currently existing access to the property will be left in place for the landowners use as well.

## 3. Reclamation Timetable

The time for reclamation is shown below. Exhibit L: Reclamation Costs describes the worst-case bond scenario.



**Table E-2 Reclamation Timetable**

Stage	Description	Mining Time	
1	Establish access roads and facilities shown on Map C-2. Begin topsoil and overburden removal. Initiate mining.	4	Years
2	Advance mining down and southward while conducting concurrent reclamation. Processing and sales of materials from the site.	8	Years
3	Complete mining and finalize slopes for reclamation.	2	Years
4	Revegetation monitoring	2	Years
<b>Total</b>		<b>16</b>	<b>Years</b>

## 4. Revegetation Plan

For all revegetated areas the soil will be disced to loosen the soil. Seed will be drilled in all areas if practicable. In the event that drill seeding is not practicable, broadcast seeding will be conducted instead. Broadcast seeding will be conducted at twice the seeding rate of drill seeding. Certified weed free mulch will be crimped into the surface at a rate 2000 pounds per acre. Fertilizer may be added as determined by a soil test at the time of seeding, but fertilizer is not required by default. Furrows will be left in the tilled topsoil to provide moisture concentration and shade areas in order to promote better conditions for successful vegetation establishment. Seeding will take place the fall after which a slope has been retopsoiled. Slopes will be regraded, backfilled, and retopsoiled as soon as they are able to be reclaimed.

#### 4.1. Dryland Seed Mix

<u>Species</u>	<u>Pounds of pure live seed per acre</u>
Smooth Brome	13.0
Pubescent Wheatgrass	12.0
Slender Wheatgrass	4.4
<b>Total</b>	<b>29.4</b>

The seeding rates listed above are drilling rates.

### 5. Post-Reclamation Site Drainage

Map F-1 shows arrows indicating the approximate direction of post-reclamation drainage throughout the pit. The final reclamation will be graded so that drainage water will go in a similar path to the original path. The daylighting of the pit to the southwest will ensure that all runoff continues the pre-mine northeast-to-southwest flow pattern.

### 6. Weed Control

Measures will be employed for the control of any noxious weed species. The objective of this weed management plan is to control undesirable plants on the Kasttenburg Pit 1 property. Plants identified through the Colorado Noxious Weed Act (C.R.S. 35-5.5) and the Grand County Noxious Weed List as undesirable and designated for management within the county will be removed. These plants identified as noxious weeds will be managed by control measures. A Weed Control Plan will be utilized as follows:

- 1) Each April, a weed survey will be taken of the permit area.
- 2) If any patches or plants have been identified, they will be sprayed by backpack sprayer or 4-wheeler using chemicals approved for use by the weed control staff of Grand County.
- 3) After reclamation, weed surveys and spraying will continue until the perennial cover and production of the site have met DRMS requirements and bond release has been obtained.

The Division and Granf County staff will be consulted regarding any weed infestation areas and any control measures prior to their initiation. The plan does not contemplate total weed removal on the property. Past experience has shown that some initial weed cover in the first year following the retopsoiling is beneficial to the reclamation effort in rangeland site. Weeds tend to

provide shade for new grasses, are a means of holding snow on the seedbed longer and protecting it from wind and water erosion until the planted species have taken hold.

During all phases of the mining operation the permit area will be monitored closely every year, through which the operator may determine if any additional weeds have grown. If any new species of weeds are found, Grand County and the Division will be consulted in order to formulate the best plan for the new infestation.

## 7. Revegetation Success Criteria

### 7.1. Dry Rangeland Areas

These areas will be deemed adequate when the dryland vegetation has been established in order to control erosion and noxious weeds are not present in any significant amounts and all of the conditions of Rule 3.1.10 have been met.

## 8. Monitoring Reclamation Success

Monitoring the reclamation on an ongoing basis will allow minor revisions to ensure successful reclamation. The operator plans to use the local NRCS office to assist in determining the ability of the reclaimed land to control erosion. If minor changes or modifications are needed to the seeding and reclamation plan, revision plans will be submitted to the Division as required. It is hoped that the Division will provide assistance in evaluating the success of the ongoing reclamation process. All areas disturbed and reclaimed and any other important items regarding the reclamation will be submitted in the annual reports to the Division



LEGEND

BOUNDARIES

DRMS Permit Boundary  
Incorporated city or equivalent

BUILDINGS AND RELATED STRUCTURES

Building  
Fence

LAND SURVEYS

Public Land Survey System  
Range or Township line  
Range or Township labels  
Section line  
Section numbers  
Property boundary  
Mining claim

ROADS AND RELATED FEATURES

Highway  
Light duty road, paved  
Light duty road, gravel

MINING FEATURES

Mining Facilities  
Berm/windrow  
Disturbed Area

RIVERS, LAKES, SHORELINES, AND CANALS

Perennial stream/ditch  
Perennial river  
Intermittent stream/ditch  
Perennial lake/pond  
Intermittent lake/pond  
Wells  
Drainage direction

TRANSMISSION LINES AND PIPELINES

Power transmission line; pole; tower  
Telephone/data line, buried

BASELINE CONTOURS

Index  
Intermediate

POST-RECLAMATION CONTOURS

Index  
Intermediate

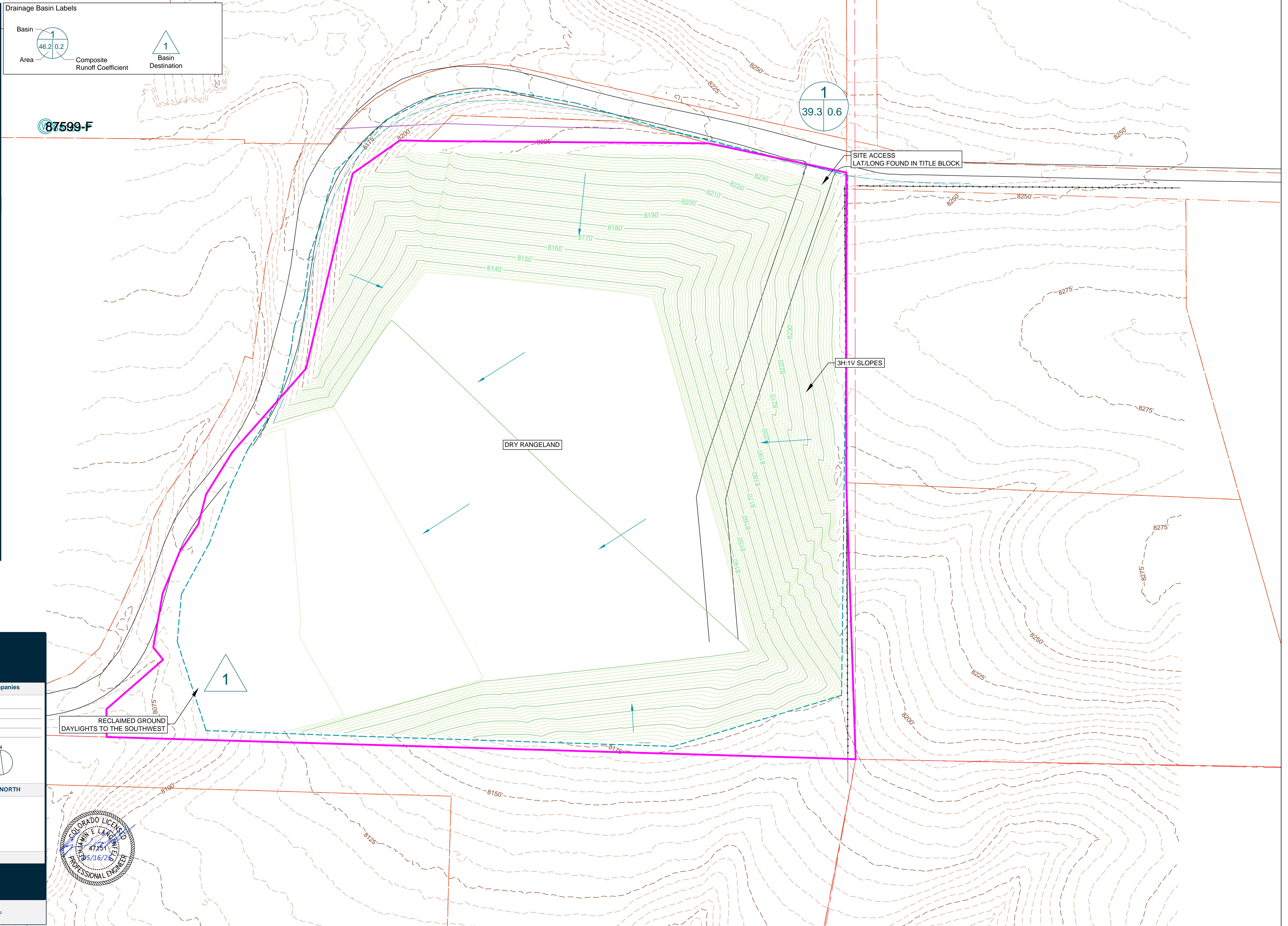
Drainage Basin Labels

Basin  
Area

Composite  
Runoff Coefficient

Basin  
Destination

87599-F



F-1 Reclamation Plan  
Kattenberg Pit

DRMS Permit Number: M-2004-017

United Companies

Mine Entry Location:

Latitude: 40.0863  
Longitude: -105.9047

State: CO

County: Grand  
Nearest Town: Granby

Section: 33

Township: 2N  
Range: 76W  
PM: 6th

Major Watershed:

Colorado River  
MSHA ID: N/A

Map Scale: 1"=200

0 200 400

N

Map Georeferencing Information:

Datum: NAD83  
Projection: CO NORTH

Survey Source: Drone  
Imagery Source: Google  
Survey Date: 10/2022  
Imagery Date: 2019

Drawn by: BEL  
Checked by: BEL  
Approved by: BEL

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File Name: Kattenberg 250508

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# EXHIBIT G

# WATER INFORMATION

## 1. General

The Kattenburg Pit's lies north of the Fraser River by roughly 0.5 miles. It is located on a dryland terrace that lacks any surface water features. It is outside of the FEMA mapped floodplain in this area. Groundwater is located at a variety of depths below the ground. Well records in the area show groundwater depths of 1-foot deep, 57-feet deep, and 180-feet deep.

## 2. Water Quality Protection

The primary concerns surrounding water quality protection at the Kattenburg Pit are the potential impacts to the surface and groundwater from sediment, hydraulic fluids, and diesel fuel. Sediment will be controlled through the use of stormwater retention within the disturbance area through the life of the mine. The site will be graded in a manner that maintains all surficial flows within the disturbed area, in turn containing all sediment and unwanted discharges from leaving the site. Stormwater berms will be constructed at the edge of mining to prevent sediment discharges in the Fraser River. Hydraulic fluids and diesel fuels will be contained within vehicles that follow best practices of maintenance; these practices include regular inspections of vehicles, hydraulic lines, and any other potential spill sources. Diesel fuel or other oils will not be stored on-site.

Any surface water discharges from the site will be sampled in accordance with the NPDES discharge permit. All discharge will be via the approved Outfall, the proposed location of which is shown on Map C-3.

**Table G-1. Surface Water Discharge Monitoring Requirements in NPDES Discharge Permit**

<b>Parameter</b>	<b>Monitoring Frequency</b>	<b>Sample Type</b>
<b>Flow</b>	Instantaneous, Monthly	In-situ
<b>pH</b>	2x/month	Grab
<b>Total Suspended Solids</b>	2x/month	Grab
<b>Oil and Grease Visual</b>	2x/month	Visual
<b>Oil and Grease</b>	Contingent on visibility of oil and grease	Grab
<b>Total Flow</b>	Instantaneous, Monthly	Calculated
<b>Selenium, Potentially Dissolved</b>	2x/month	Grab
<b>Total Dissolved Solids</b>	Quarterly	Grab

Note: these are the anticipated analytes based on operator experience at similar sites. CDPHE may issue different sampling requirements with the permit.

### 3. Floodplain

The site has not been mapped for flood potential by the Federal Emergency Management Agency. Based on upstream data, the areas surrounding the drainage are likely within the 100-year floodplain of the Fraser River, but not within the floodway.

### 4. Wetlands

The National Wetlands Inventory aerial-based mapping indicates the presence of wetlands within the permit area. These wetlands are mostly in the existing drainage and will not be disturbed, aside from wetlands crossings for access. A USACE Wetlands Permit will be obtained prior to any wetlands disturbances. Exhibit C and F maps show the NWI mapped wetlands.



## 5. Aquifers

The Fraser River aquifer is the only identified aquifer located at the site. It has an approximate depth of 10 feet in the upland areas of the site. It is approximately 35 feet below the surface of the terraces further from the creek.

## 6. Surface Water

The mining operation will impact surface water in the area through the stormwater runoff that enters the site. Map G-1 shows the drainage patterns and how they are affected throughout the life of the mine. The maps include information on the drainage basins currently, during mining, and post reclamation. The primary concern for surface water protection at the site is preventing the discharge of sediment, oil, and/or hydraulic fluids from the operation areas. Oils and hydraulic fluids are stored on site following the standard best management practices. These practices include the use of secondary containment at fluid storage and transfer points, spill kits, and employee training regarding safe handling practices. Sediment is trapped onsite using controls and best management practices by directing and controlling surface water runoff that enters the disturbed areas. More information on sediment and surface water control is provided below.

### 6.1. Surface Water Handling

In the pre-mine condition the site drained naturally to the southwest towards the Fraser River. During mining, runoff will be collected along the stormwater control berm in the southwest end of the site and routed to the groundwater exposure for infiltration. Upon reclamation, the site will drain to the southwest and to the Fraser again.

### 6.2. Disturbed Area Runoff

During all stages of mining, there is enough water storage capacity to contain the 5-year and 100-year 24-hour storm events and prevent erosion from surface water discharge. The expected rainfall from these events at the Kattenburg Pit is provided in Table G-2 below.

The peak runoff was generated from these values for the various drainage basins during all stages of mining. Pre-mine, mining, and reclamation conditions are delineated on maps C-1, C-2, F-1. The discharge volumes from these storm events are calculated in Appendix G-1 at the end of this exhibit. Table G-3 summarizes the runoff volumes and storage volumes for each drainage. All drainage calculations were made using the Rational Method identified in the Mile High Flood Control District.

**Table G-2. Drainage Calculations**

<b>Drainage Basin 1</b>					
<b>Site Condition</b>	Area (ac)	Runoff Coefficient	100-Yr 24-Hr Runoff (ac-ft)	Peak Flow Rate (cfs)*	Detention Capacity (ac-ft)***
<b>Base</b>	39.33	0.2	0.436	45.25	0
<b>Mine</b>		0.6	4.403	23.68	66.8
<b>Reclamation</b>		0.25	0.436	9.87	0

\* The discharge flow rate is calculated from the peak discharge of the 100-Yr 24-Hr storm event using the Rational Method.

\*\*Discharge flow rate is variable and controlled during mining as all discharges are pumped from the pit

\*\*\*Detention Capacity calculated in CAD as the surface volume available between the pit floor and the top of the stormwater control berm.

## 7. Groundwater

Groundwater has been encountered in the pit at a depth of 25-feet below the original ground level. The 1-foot deep groundwater is found in well 7599-F, which is located near the airport to the west. This well has a collar elevation at least 100-ft below the Kattenburg Pit. The 57-foot deep groundwater value is located in well 22403, which is northwest of the pit. This well is a domestic supply well installed in 1964 and may not be an accurate representation of the gravel aquifer passing through the area. The other nearest well, 264287, has a water level of 180-feet. However, Well 264287 is installed in the shale below the local sand and gravel deposit and is thus not an accurate representation of groundwater in the sand and gravel that is being mined.

### 7.1. Groundwater – Mining

Given the groundwater information from the nearby wells, the encountering of groundwater in the pit, and how the gravel deposit being mined daylights at the southwest end of the property, it is theorized that groundwater encountered in the pit will drop as mining continues. The lack of groundwater consistently found in the sand and gravel of surrounding wells at the same elevation as the deposit being mined indicates that the water found in the pit is likely to be infiltrated surface water that has not yet flowed out of the deposit daylight to the southwest. However, since this is only a theory, the permittee has secured a gravel well permit to cover 0.1 acre of groundwater exposure at the mine.

### 7.2. Groundwater – Reclamation

Upon reclamation, when the reclaimed mine floor daylights to the southwest, all surface water will flow offsite in the same manner as the pre-mine condition. Any groundwater exposure that remains at that point will be backfilled, but no exposure is anticipated.

## 8. Water Related Permits

The permittee will maintain all necessary water related permits. This will include a stormwater discharge permit with CDPHE Water Quality Control Division and a gravel well permit with the Colo. Div. of Water Resources.

## 9. Water Consumption and Source

Water usage is from a combination of groundwater evaporation, aggregate production, and dust suppression. The total is estimated at 1.92 acre-ft of water a year.

All water is sourced from approved vendors and sources that meet regulatory requirements.



## Appendix G-1

## Hydrology Calculations

Pre-mine drainage basins and conditions are shown on Map C-1A. Mining drainage basins are shown on Map C-2. Reclaimed drainage patterns are shown on Map F-1.

Runoff conditions are calculated in three conditions: pre-mine, mining, and reclaimed. This is to show the baseline runoff condition of the site, how mine disturbance will change that, and what the post-mine runoff conditions will be.

All stormwater designs are based on the 100-YR 24-HR storm event for this area of Colorado. Runoff modelling is conducted for both operating and reclaimed conditions. Calculations of runoff, both in terms of volume and flow, are according to the Rational Method.

The Rational Method is a widely used technique in hydrology for estimating peak discharge from small drainage basins during storm events. It is based on the premise that peak discharge is proportional to rainfall intensity, catchment area, and a runoff coefficient that accounts for land use and soil type. The method uses the formula  $Q = CiA$ , where  $Q$  is the peak discharge (cubic feet per second or cubic meters per second),  $C$  is the runoff coefficient,  $i$  is the rainfall intensity (inches per hour or millimeters per hour), and  $A$  is the catchment area (acres or hectares). This method is particularly useful for catchments where the time of concentration is relatively short.

The maps summarize the drainage basins ( $A$ ). Runoff coefficients are based on land conditions ( $C$ ). NOAA data for rainfall intensity ( $i$ ) is used. Runoff coefficients are typical values from ASCE<sup>1</sup> tables included in the hydrology software as well as the Urban Storm Drainage Criteria Manual. The coefficients are based on the soil type and either unimproved ground (0.13-0.25) or light industrial ground (0.5-0.55) for the vegetated and disturbed conditions of the site respectively.

Assumptions: The following assumptions are made for the surface hydrology model.

1. NOAA rainfall intensities that are publicly available are accurate.
2. The computed maximum rate of runoff to the design point is a function of the average rainfall rate during the time of concentration to that point.
3. The hydrologic losses in the catchment are homogeneous and uniform.
4. The runoff coefficients represent the average soil antecedent moisture condition, imperviousness, and type of soil.

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<sup>1</sup> American Society of Civil Engineers

5. The depth of rainfall used is one that occurs from the start of the storm to at least the time of concentration, and the design rainfall depth during that time period is converted to the average rainfall intensity for that period.
6. The maximum runoff rate occurs when the entire area is contributing flow.

# EXHIBIT L

## WORST CASE RECLAMATION SCENARIO

The worst case reclamation scenario for the Kattenburg Pit is at the end of mining, when the full length of interim will need backfilling, grading, and revegetation. The steps of reclamation at this point are outline below:

### Final reclamation

- Highwall backfilling = 2H:1V to 3H:1V slope for 750-ft by 20-ft tall slope (Total = 22,222 CY). Work to be done by front-end loader.
- Topsoiling of all disturbed areas outside of lakes to a depth of 7 inches = 33.9 acres. Average dozer push distance will be 150-ft. Earth will be delivered to dozers for spreading by truck and shovel. Average topsoil haul distance will be 950-ft.
- Discing of topsoil to a depth of 7-inches over all topsoiled areas. Topsoil is expected to swell roughly 20%.
- Drill seeding with dryland seed mix in all other seed areas. Assuming a 25% seed failure rate, applied by increasing the seeding area to 125% of the topsoiled area.
- Facility removal (office trailer, truck scale, etc.)
- Mulching and crimping of mulch over seeding dryland areas.
- Two-years of weed control management.

**Table L-1 Reclamation Task and Cost Estimate**

Description	Material Quantity	Unit	Unit Cost	Cost
Highwall backfilling from mining to final condition.	22,222	CY	\$1.50	\$33,333
Facilities removal.	1	Unit	\$15700	\$15,700
Topsoiling to 7 inches deep the maximum disturbance area of 33.9 acres.	31903	CY	\$1.50	\$47,855
Discing of topsoil to a depth of 7 inches over 33.9 acres.	33.9	acres	\$105	\$3,560
Seeding of 33.9-acre dryland area. (25% reseed rate = 9.8 acres)	42.4	acres	\$400	\$16,960



Description	Material Quantity	Unit	Unit Cost	Cost
Mulching and crimping of mulch over 33.9-acre dryland area.	33.9	acres	\$850	\$28,815
Weed control management for two years on 33.9 acres	33.9	acres	\$220	\$7,458
Subtotal				\$153,681
DRMS cost (28%)				\$43,031
<b>Total Bond Amount</b>				<b>\$196,712</b>