



May 29, 2025

Colorado Division of Reclamation, Mining, and Safety
Ms. Ursula Armstrong
Environmental Protection Specialist
1313 Sherman Street, Room 215
Denver, CO 80203

Re: M-1977-392 Dawson Mine, Elbert County, Colorado
Corrective Action Extension Request and Update

Dear Ms. Armstrong:

General Shale Brick, Inc. (GSB) is in receipt of the Minerals Inspection Report for the Dawson Mine dated February 13, 2025. The inspection noted 3 problems:

INSPECTION TOPIC: Sediment Control

PROBLEM #1: Erosion rills and gullies were observed throughout the portion of the permit area that lies south of the access road, including a significant erosion feature that's present on the southern highwall of the East Pit.

This is a problem at this time for failure to protect the affected land from erosion pursuant to C.R.S. 34-32.5-116

(4)(j) and Rule 3.1.6(3).

CORRECTIVE ACTIONS: The operator shall provide photo documentation to the Division verifying erosion gullies and ruts have been repaired, and that the site has have been reconstructed and stabilized to prevent erosion damage by the corrective action date.

Response:

GSB is respectfully requesting an extension of the due date of June 3, 2025 to July 3, 2025. The reason for this extension is due to the current weather pattern of rain every other day in late May and early June. Our current plan is to mobilize heavy equipment to the Dawson Mine in early June and perform the repairs.

INSPECTION TOPIC: Revegetation

PROBLEM #2: There are state-listed noxious weeds present on site, including common mullein, knapweed, and thistle. This is a problem for failure to employ weed control methods for state listed noxious weed species within the permitted area, and to reduce the spread of weeds to nearby areas as required by Rule 3.1.10(6).

CORRECTIVE ACTIONS: The operator shall implement the approved weed control plan and provide proof to the Division that this has been done by the corrective action date. If a weed control plan is not already in place, the operator shall develop a weed control and management plan in accordance with Rule 3.1.10(6). This plan should be developed in consultation with the county extension agency or weed control district office, and should include specific control measures to be applied, a schedule for when control measures will be applied and a posttreatment monitoring plan. This weed control plan shall be submitted to the Division as a Technical Revision to the approved plan with the appropriate Technical Revision fee of \$216.00 by the corrective action date.



Response:

The Dawson Mine has been sprayed for weeds on May 27, 2025. Please see attached invoice from Falcon Weed Control.

INSPECTION TOPIC: *Financial Warranty*

PROBLEM #3: *The financial warranty is not adequate to reclaim the site in accordance with the approved reclamation plan. This is a failure to maintain the proper financial warranty amount to complete reclamation of the affected lands pursuant to C.R.S. 34-32.5-117(4)(b) and Rule 4.2.1(1).*

CORRECTIVE ACTIONS: *The operator shall review the enclosed bond estimate and provide any comments or proof of reclamation completed by the corrective action date. If, by the corrective action date, no comments have been received, the Division will send a separate surety increase notice to the operator regarding the increase of the financial warranty. The operator will have 60 days from the date on the surety increase notice to post the additional financial warranty*

Response:

The bond increase was placed in the mail to the Division on May 28, 2025. GSB is respectfully requesting an extension of the due date of June 3, 2025 to July 3, 2025. The reason for this extension is to allow the Division to review and approve the surety bond increase and make changes as necessary.

Please feel free to contact me with any questions at 303-783-3058 or by email at jason.mcgraw@generalshale.com.

Sincerely,
General Shale Brick, Inc.

A handwritten signature in cursive script that reads "Jason E. McGraw".

Jason E. McGraw P.E.
Mine Supervisor

Falcon Weed Control, Inc.

20950 CR 1
Elbert, CO 80106
Phone: (303) 435-3715
E-Mail: mitchrohr27@gmail.com
Web: lazyhranchco.wix.com/falcon-weed-control.com

Invoice
CO License #14676

Commercial applicators are licensed by the Colorado Department of Agriculture

Name: General Shale
Address: 1845 Dartmouth Ave.
City: Denver Zip Code: 80110
Phone: Jason 303-435-3279
Email: jason.mcgraw@generalshale.com

Property Location: Dawson mine
Kiowa CO

Description: Rangeland
Target Pest: Broadleaf
(Unless noted. Re-entry intervals are 24 hours.)

Date	Acreage	Time In	Time Out	Temperature	Wind Speed	Direction
<u>5/27/25</u>	<u>23</u>	<u>8:30am</u>	<u>11:30am</u>	<u>57-66</u>	<u>5-6</u>	<u>SW-SW</u>

Chemical	EPA #	Amount/acre	Chemical	EPA #	Amount/acre
4 lb. Amine	11773-2	<u>3.202/ac</u>	MSM-60	81927-7	<u>1/2 oz/ac</u>
Arsenal Powerline	241-431		Opensight	62719-597	
Banvel	66330-276		Overdrive	7969-150	
Diuron 80	352-849		Panoramic 2SL	66222-141-81927	
Escort XP	352-439		Perspective	352-846	
Flagstaff	81927-61		Picloram 22K	81927-18	<u>3.202/ac</u>
Glyphosate Pro 4	524-512		Tordon 22K	62719-6	
Milestone	62719-519		<u>B</u>		

TOTAL LIQUID APPLIED: 165 gal w/ 5.75 gal Triumph 22K, 5.75 gal 4# Amine.
11.502 MSM-60

Invoices are due in full at time of work completion. Finance charges will be applied on invoices 30 days past due. Credit cards are accepted with a 3.5% upcharge. Not responsible for weather factors after application dries.

Thank you for choosing **Falcon Weed Control!**

Mitch Rohr

TOTAL ACRES TREATED:	<u>23+</u>
CHARGE PER ACRE:	<u>\$60</u>
TOTAL DUE THIS INVOICE:	<u>\$1380</u>

Thank you,
Mitch