



STATE OF
COLORADO

Simmons - DNR, Leigh <leigh.simmons@state.co.us>

C1981022, Elk Creek Mine, May Inspection Report (Bond Compliance)

Simmons - DNR, Leigh <leigh.simmons@state.co.us>
To: Doug Smith <Doug.Smith@oxbow.com>

Mon, Jun 2, 2025 at 7:42 PM

Attached

Leigh Simmons
Environmental Protection Specialist



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

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INSP-REPORTC_C1981022_LDS_06022025055729.pdf
11562K



PERMIT INFORMATION

Permit Number: C-1981-022 Mine Name: Elk Creek Mine Operator: Oxbow Mining, LLC Operator Address: Mr Doug Smith 3737 Hwy 133 P. O. Box 535 Somerset, CO 81434	County: Delta, Gunnison Operation Type: Underground Permit Status: Active Ownership: Private
	Operator Representative Present: N/A
Operator Representative Signature: (Field Issuance Only) 	

INSPECTION INFORMATION

Inspection Start Date: May 20, 2025 Inspection Start Time: 13:30 Inspection End Date: Inspection End Time:	Inspection Type: Coal Partial Inspection Inspection Reason: Normal I&E Program Weather: Clear
Joint Inspection Agency: None	Joint Inspection Contacts:
Post Inspection Agency: None	Post Inspection Contacts:
Inspector(s): Leigh Simmons	Inspector's Signature:  Signature Date: June 2, 2025

Inspection Topic Summary

NOTE: Y=Inspected N=Not Inspected R=Comments Noted V=Violation Issued NA=Not Applicable

- | | |
|------------------------------------|------------------------------------|
| N - Air Resource Protection | Y - Roads |
| N - Availability of Records | Y - Reclamation Success |
| Y - Backfill & Grading | Y - Revegetation |
| Y - Excess Spoil and Dev. Waste | N - Subsidence |
| N - Explosives | N - Slides and Other Damage |
| Y - Fish & Wildlife | Y - Support Facilities On-site |
| Y - Hydrologic Balance | Y - Signs and Markers |
| Y - Gen. Compliance With Mine Plan | N - Support Facilities Not On-site |
| N - Other | N - Special Categories Of Mining |
| N - Processing Waste | Y - Topsoil |

COMMENTS

This was a partial inspection by Leigh Simmons of the Division of Reclamation, Mining and Safety (Division). The weather was clear and dry. The status of the Elk Creek Mine is “active” however no coal is being mined and the only activity since the last inspection was site maintenance.

A focus of the inspection was ‘bond compliance’, i.e. to ensure that the bond held by the Division would be sufficient to complete outstanding reclamation tasks on the ground.

The demolition of structures and the backfilling and grading of the facilities area have mostly been completed at the Elk Creek Mine, as far as the operator (and land owner) Oxbow Mining is concerned, since Oxbow’s stated intention is to use the site for industrial and commercial purposes. However a significant portion of the facilities area has not yet been through any of the phases of bond release, because either some small tasks remain, some mining related equipment continues to be stored on the land, or the land has not yet been put to use for industrial or commercial purposes. A screen shot of the facilities map of the lower facilities area, with bond-released parcels overlain is included in Figure 2.

Some permitting work will be necessary before a bond release application can be submitted, as has been detailed in the Findings documents of the most recent Permit Renewal ([RN-8](#)).

The fact that the approved reclamation plan doesn’t exactly represent Oxbow’s plan for the site complicates somewhat the bond compliance review process, however the approved reclamation plan, the most recent cost estimate and the conditions on the ground can all be compared irrespective of Oxbow’s plans, and it can be demonstrated fairly easily that the Division holds more than enough bond to complete outstanding reclamation tasks.

The Division holds a bond for the Elk Creek Mine of \$2,000,000. The minimum required surety for the site is \$1,893,212, so an excess of \$106,788 is held. The value of the minimum required surety was established by a re-evaluation of the sitewide Reclamation Cost Estimate (RCE) with RN-8, in 2024.

Number of Partial Inspection this Fiscal Year: 8
 Number of Complete Inspections this Fiscal Year: 3

In addition to the excess held, the RCE itself contains many tasks, including a number of high value tasks, which have been completed but must be retained in the RCE because of the bond release rules. Annotated screenshots of the RCE are included below.

All structure demolition for the site is covered by task 130, which has a total value of \$885,225 (see Figure 1). The task includes line items for particular structures, most (but not all) of which have been demolished. Rather than go through the entire task line-by-line, it is sufficient to look at just two types of structures to illustrate the point. The large concrete silo at the site entrance has been demolished, as have all conveyor structures. These line items are shown with red boxes in Figures 3-5. The value of the direct cost of these tasks exceeds \$416,000.

Many more tasks than those mentioned have been completed, which would reduce the liability of the direct costs for the site. Indirect costs would also be reduced proportionally

In summary, the most conservative assessment of the adequacy of the bond shows that the Division holds a comfortable excess over the amount which would be required to complete the remaining reclamation tasks at the site.

DOCUMENTS RECEIVED

N/A

OTHER (SPECIFY)

N/A

ENFORCEMENT ACTIONS/COMPLIANCE

No enforcement actions were initiated as a result of this inspection, nor are any pending.

Number of Partial Inspection this Fiscal Year: 8

Number of Complete Inspections this Fiscal Year: 3

MAPS, SCREENSHOTS & PHOTOGRAPHS

COST SUMMARY WORK

Task description: Site-wide Reclamation Cost Estimate Update
 Site: Elk Creek Mine Permit Action: RN8 Permit/Job#: C1981022

PROJECT IDENTIFICATION

Task #: 000 State: Colorado Abbreviation: None
 Date: 2/13/2024 County: Delta Filename: C022-000
 User: LDS
 Agency or organization name: DRMS

TASK LIST (DIRECT COSTS)

Task	Description	Form Used	Fleet Size	Task Hours	Cost
001	Backfill and Regrade Elk Creek Facilities Area	DOZER	3	90.27	\$102,967
004	Backfill and Grade Material Used to Widen Access Road	DOZER	3	1.53	\$1,749
005	Backfill and Regrade Elk Creek Mine Area	DOZER	3	101.64	\$115,938
006	Move Fill Material from Elk Creek Mine to Elk Creek Faciliti	SCRAPER1	1	45.33	\$51,377
008	Backfill and Regrade Primary Riprap Borrow Area	DOZER	3	4.75	\$5,423
009	Backfill and Regrade Secondary Riprap Borrow Area	DOZER	3	12.05	\$13,739
010	Backfill and Regrade Elk Creek Mine Rock Safety Catch Bench	DOZER	3	23.52	\$26,832
011	Backfill and Regrade Temporary Conveyor Corridor	DOZER	3	11.87	\$13,542
012	Regrade Expanded Elk Creek Mine Fan Bench	DOZER	3	1.06	\$1,205
034	Rip All Surface Facility Areas	RIPPER	3	29.04	\$36,237
041	Regrade Lower Power Line Access Road	EXCAVATE	1	41.01	\$8,466
042	Regrade Pond C Access Road	DOZER	3	3.85	\$4,391
050	Finish Grade All Disturbed Areas	GRADER	1	53.85	\$14,576
066	Remove Upper Hubbard Creek Sediment Pond	DOZER	1	2.99	\$1,135
067	Regrade East Bench Pond	DOZER	1	0.61	\$231
068	Excavate/Backfill Pond C Wall Area	EXCAVATE	1	1.67	\$345
071	Remove Sewage Leach Field	DOZER	1	0.61	\$231
072	Regrade Pond A	DOZER	1	0.61	\$231
073	Regrade Pond B	DOZER	1	26.02	\$9,891
075	Regrade Pond E	DOZER	1	4.39	\$1,668
077	Regrade Pond F	DOZER	1	2.26	\$858
090	Replace Topsoil from Stockpile to Previously Disturbed Elk A	SCRAPER1	1	1.86	\$2,112
095	Replace Topsoil from Stockpile to II West Refuse Pile Road	SCRAPER1	1	1.09	\$1,236
096	Replace Topsoil from Stockpile to Expanded Elk Creek Mine Fa	DOZER	3	0.13	\$153
103	Replace Topsoil from Stockpile to Pond F, Ditches and Plunge	DOZER	1	2.86	\$1,086
120	Broadcast Seed Mine Site	REVEGE	1	216.50	\$92,910
121	Re-seed Drill Pads and Roads 49.82 acres @ 2% failure	REVEGE	1	49.82	\$897
130	Demolish and Remove All Mine Facilities	DEMOLISH	1	600.00	\$885,255
151	Plug and Seal / Monitoring wells	BOREHOLE	1	42.00	\$25,914

Cost Summary Worksheet Cont'd

Task # 000

Page 2 of 2

140	Mobilize/Demobilize Equipment for Initial Reclamation	MOBILIZE	1	10.00	\$29,655
141	Mobilize/Demobilize Equipment for Pond Removal	MOBILIZE	1	7.14	\$6,635
142	Mobilize/Demobilize Equipment for Site Maintenance	MOBILIZE	1	14.00	\$18,433
150	Yearly site maintenance	SITEMAINT ENANCE	1	140.00	\$14,720
SUBTOTALS:				1544.33	\$1,488,038

INDIRECT COSTS

OVERHEAD AND PROFIT:

Liability insurance:	2.02	Total =	\$30,058
Performance bond:	1.05	Total =	\$15,624
Job superintendent:	772.16	Total =	\$50,252
Profit:	10.00	Total =	\$148,804
		TOTAL O & P =	\$244,739
		CONTRACT AMOUNT (direct + O & P) =	\$1,732,777

LEGAL - ENGINEERING - PROJECT MANAGEMENT:

Financial warranty processing (legal/related costs):	\$500	Total =	\$500
Engineering work and/or contract/bid preparation:	5.23	Total =	\$90,624
Reclamation management and/or administration:	4.00	Total =	\$69,311

CONTINGENCY: 0.00 Total = \$0

TOTAL INDIRECT COST = \$405,174

TOTAL BOND AMOUNT (direct + indirect) = \$1,893,212

Figure 1: Screenshot of RN-8 RCE cost summary, with Demolition task 130 highlighted

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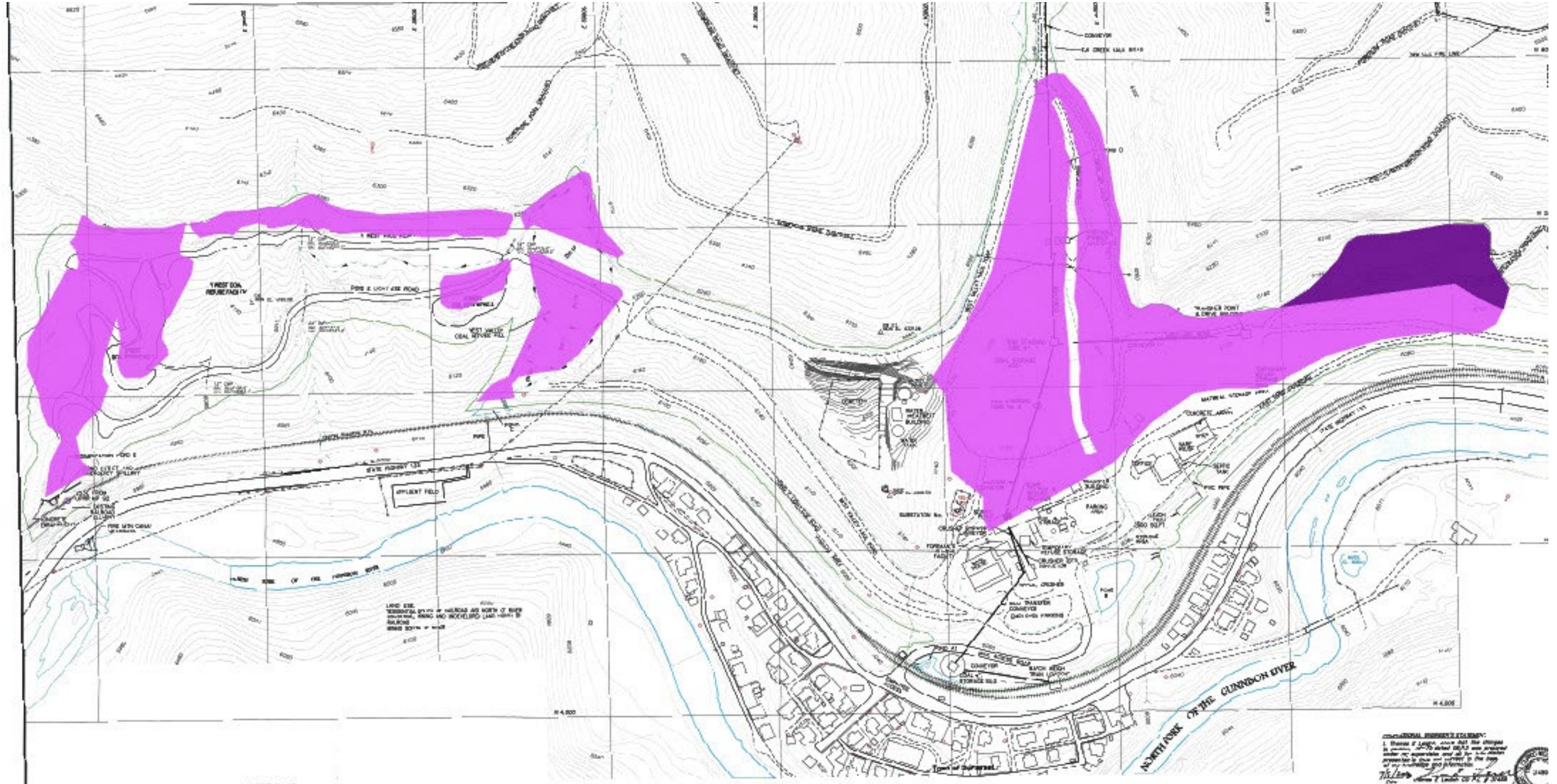


Figure 2: Screenshot of reclamation parcels overlain on Map 2.05-M5, sheet 1 of 6. Bright pink parcels have been Phase II released, purple parcels have been Phase III released, other areas have not been bond released.

Number of Partial Inspection this Fiscal Year: 8
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Reveg Worksheet Cont'd

Task # 121

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Totals Seed Mix	8.10	69.28	\$71.25
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Application

Description	Cost /Acre
Broadcast seeding [DMG]	\$267.22
Total Seed Application Cost/Acre	\$267.22

MULCHING and MISCELLANEOUS

Materials

Description	Units / Acre	Unit	Cost / Unit	Cost /Acre
Herbicide - Curtail @ 4.0 pt/ac	2.00	ACRE	\$35.09	\$70.18
Herbicide - Escort @ 1.0 pt/ac	2.00	ACRE	\$74.72	\$149.44
Total Mulch Materials Cost/Acre				\$219.62

Application

Description	Cost /Acre
	\$
Total Mulch Application Cost/Acre	\$0.00

NURSERY STOCK PLANTING

Common Name	No / Acre	Type and Size	Planting Cost	Fertilizer Pellet Cost	Cost /Acre
					\$
Totals Nursery Stock Cost / Acre					\$0.00

JOB TIME AND COST

No. of Acres: 1 Cost /Acre: \$896.89
 Estimated Failure Rate: 0% Cost /Acre*: \$338.47
 *Selected Replanting Work Items: SEEDING
 Initial Job Cost: \$896.89
 Reseeding Job Cost: \$0.00
 Total Job Cost: \$897
 Job Hours: 49.82

CIRCES Cost Estimating Software

Figure 3: Annotated screenshot of task 130 (1 of 3)

Number of Partial Inspection this Fiscal Year: 8

Number of Complete Inspections this Fiscal Year: 3

DEMOLITION WORK

Task description: Demolish and Remove All Mine Facilities

Site: Elk Creek Mine Permit Action: RN8 Permit/Job#: C1981022

PROJECT IDENTIFICATION

Task #: 130 State: Colorado Abbreviation: None
 Date: 2/14/2024 County: Delta Filename: 022-130
 User: LDS

Agency or organization name: DRMS

UNIT COSTS

Location adjustment: 91.30 %

Structure or Item Description	Dimensions	Demolition Menu Selection	Quantity	Unit	Unit Cost	Total Cost
Elk Creek Fan Structures	15'x10'x50'	Bldg. (MN) demo./on-site disposal in existing pit or cut - Max. 10,000 ft. haul	15,000.00	CF	\$0.32	\$4,806.00
- Pads	18'x60'x6"	Demo. and on-site disposal in existing pit, 6 in. thick - Max. 10,000 ft. haul	2,160.00	SF	\$1.26	\$2,715.55
Substation No. 4	25'x25'x20'	Bldg. (MN) demo./on-site disposal in existing pit or cut - Max. 10,000 ft. haul	12,500.00	CF	\$0.32	\$4,005.00
- Pad	25'x25'x6"	Demo. and on-site disposal in existing pit, 6 in. thick - Max. 10,000 ft. haul	625.00	SF	\$1.26	\$785.75
- Fencing	100 LF	Fencing, chain link, including posts and fabric - 8 ft. to 10 ft. high	100.00	LF	\$3.39	\$339.00
- Transformer	NA	NON-PCB Transformer Removal	1.00	EA	\$2,314.20	\$2,314.20
200,000 Gallon Water Tank	200,000 Gallons	Bldg. (MN) demo./on-site disposal in excavated pit - Max. 10,000 ft. haul	28,510.00	CF	\$0.34	\$9,676.29
Rock Dust Tanks (2)	20'x15' Diameter	Bldg. (MN) demo./on-site disposal in excavated pit - Max. 10,000 ft. haul	7,069.00	CF	\$0.34	\$2,399.22
- Pads	16'x8'x8"	Demo. and on-site disposal in existing pit, 8 in. thick - Max. 10,000 ft. haul	256.00	SF	\$1.68	\$429.11
- Footings	8@8.75'x2'	Demo. and on-site disposal in existing pit, 2.0 ft. x 3 ft. - Max. 10,000 ft. haul	24.00	LF	\$15.09	\$362.07
Overland Conveyors	2,400 LF	Conveyor, Horizontal Belt 24" Belt, 61.5' Length	40.00	EA	\$3,350.00	\$134,000.00
- Transfer Towers (3)	10'x20'x25'	Bldg. (MN) demo./on-site disposal in excavated pit - Max.	15,000.00	CF	\$0.34	\$5,091.00

- Pads	10'x20'x12"	10,000 ft. haul Demo. and on-site disposal in existing pit, 12 in. thick - Max. 10,000 ft. haul	600.00	SF	\$2.51	\$1,508.58
Powerlines	3,100 LF	Utility Poles, Wood 35' - 45' high (each pole)	30.00	EA	\$307.50	\$9,225.00
Elk Creek Culvert	300 LF x 9' D	Pipe, corrugated metal (CMP) - 108 in. diameter pipe	300.00	LF	\$55.40	\$16,621.23
Substation No. 1 Transformers (3)	NA	NON-PCB Transformer Removal	3.00	EA	\$2,314.20	\$6,942.60
- Equipment	6'x8'x6'	Bldg. (SN) demo./on-site disposal in excavated pit - Max. 10,000 ft. haul	288.00	CF	\$0.24	\$68.40
- Pad	25'x25'x6"	Demo. and on-site disposal in existing pit, 6 in. thick - Max. 10,000 ft. haul	625.00	SF	\$1.26	\$785.75
- Fence	100 LF	Fencing, chain link, including posts and fabric - 8 ft. to 10 ft. high	100.00	LF	\$3.39	\$339.00
Explosives Magazine	20'x25'x10'	Bldg. (SN) demo./on-site disposal in excavated pit - Max. 10,000 ft. haul	10,000.00	CF	\$0.24	\$2,375.00
Dump Station	140'x40'x12'	Bldg. (MN) demo./on-site disposal in excavated pit - Max. 10,000 ft. haul	67,200.00	CF	\$0.34	\$22,807.68
- Pad	140'x40'x6"	Demo. and on-site disposal in existing pit, 6 in. thick - Max. 10,000 ft. haul	5,600.00	SF	\$1.26	\$7,040.32
- Footing	1'x2'x360 LF	Demo. and on-site disposal in existing pit, 1.0 ft. x 2 ft. - Max. 10,000 ft. haul	360.00	LF	\$5.03	\$1,810.33
125 and 500 Ton Steel Bins	NA	Bldg. (MN) demo./on-site disposal in excavated pit - Max. 10,000 ft. haul	21,094.00	CF	\$0.34	\$7,159.30
Truck Scale Pad	10'x60'x12"	Demo. and on-site disposal in existing pit, 12 in. thick - Max. 10,000 ft. haul	600.00	SF	\$2.51	\$1,508.58
- Building	Assume 5' Deep	Bldg. (SN) demo./on-site disposal in excavated pit - Max. 10,000 ft. haul	3,000.00	CF	\$0.24	\$712.50
- Footing	1.5'x3'x140 LF	Demo. and on-site disposal in existing pit, 1.5 ft. x 3 ft. - Max. 10,000 ft. haul	140.00	LF	\$11.31	\$1,584.04
Tipple Structure	30'x50'x50'	Bldg. (MN) demo./on-site disposal in excavated pit - Max.	75,000.00	CF	\$0.34	\$25,455.00

Figure 4: Annotated screenshot of task 130 (2 of 3)

Number of Partial Inspection this Fiscal Year: 8

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- Pad	30'x50'x12"	10,000 ft. haul Demo. and on-site disposal in existing pit, 12 in. thick - Max. 10,000 ft. haul	1,500.00	SF	\$2.51	\$3,771.45
- Footing	1.5'x3'x160 LF	Demo. and on-site disposal in existing pit, 1.5 ft. x 3 ft. - Max. 10,000 ft. haul	160.00	LF	\$11.31	\$1,810.34
Coal Screening Facility	35'x35'x55'	Bldg. (MN) demo./on-site disposal in excavated pit - Max. 10,000 ft. haul	67,375.00	CF	\$0.34	\$22,867.08
- Pad	35'x55'x12"	Demo. and on-site disposal in existing pit, 12 in. thick - Max. 10,000 ft. haul	1,225.00	SF	\$2.51	\$3,080.02
- Footing	1.5'x3'x140 LF	Demo. and on-site disposal in existing pit, 1.5 ft. x 3 ft. - Max. 10,000 ft. haul	140.00	LF	\$11.31	\$1,584.04
Dump Station/Truck Scale Conveyors	140 LF	Conveyor, Horizontal Belt 24" Belt, 61.5' Length	2.00	EA	\$3,350.00	\$6,700.00
Crusher/Feeder Conveyor	160 LF	Conveyor, Horizontal Belt 24" Belt, 61.5' Length	2.00	EA	\$3,350.00	\$6,700.00
Crusher Bypass Conveyor	200 LF	Conveyor, Horizontal Belt 24" Belt, 61.5' Length	3.00	EA	\$3,350.00	\$10,050.00
Silo Feeder Conveyor	380 LF	Conveyor, Horizontal Belt 24" Belt, 61.5' Length	6.00	EA	\$3,350.00	\$20,100.00
Loadout Feeder Conveyor	350 LF	Conveyor, Horizontal Belt 24" Belt, 61.5' Length	6.00	EA	\$3,350.00	\$20,100.00
Coal Storage Silo	140'x70' Diameter	Explosive demolition, large projects - Concrete structures	539,000.00	CF	\$0.37	\$199,430.00
- Headhouse	20'x20'x10'	Bldg. (MN) demo./on-site disposal in excavated pit - Max. 10,000 ft. haul	4,000.00	CF	\$0.34	\$1,357.60
- Pad	12'x70' Diameter	Demo. and on-site disposal in existing pit, 12 in. thick - Max. 10,000 ft. haul	3,848.00	SF	\$2.51	\$9,675.03
- Footing	2'x3'x220 LF	Demo. and on-site disposal in existing pit, 2.0 ft. x 3 ft. - Max. 10,000 ft. haul	220.00	LF	\$15.09	\$3,318.94
Batch-Weigh Loadout	27'x27'x100'	Bldg. (MN) demo./on-site disposal in excavated pit - Max. 10,000 ft. haul	72,900.00	CF	\$0.34	\$24,742.26
- Pad	27'x27'x12"	Demo. and on-site disposal in existing pit, 12 in. thick - Max. 10,000 ft. haul	729.00	SF	\$2.51	\$1,832.92

		in. thick - Max. 10,000 ft. haul				
- Footers	2'x3'x420 LF	Demo. and on-site disposal in existing pit, 2.0 ft. x 3 ft. - Max. 10,000 ft. haul	420.00	LF	\$15.09	\$6,336.16
Concrete Dams	14'x155'x2'	Wall, concrete, demolition only, average reinforcing - 24 in. thick	2,170.00	SF	\$5.51	\$11,956.05
- Dam Base	15'x155'x2'	Pavement, concrete, demolition only, 7 in. to 24 in. thick - Reinforced	172.00	CY	\$144.50	\$24,854.00
Culvert IIW-4	12"x100 LF	Pipe, corrugated metal (CMP) - 12 in. diameter pipe	100.00	LF	\$4.37	\$436.53
Culvert IIW-5	12"x100 LF	Pipe, corrugated metal (CMP) - 12 in. diameter pipe	100.00	LF	\$4.37	\$436.53
Tank Containment Walls	16'x44'x4' (8")	Demo. and on-site disposal in existing pit, 8 in. thick - Max. 10,000 ft. haul	485.00	SF	\$4.06	\$1,969.88
Covered Oil Storage	25'x16'x20'	Bldg. (MN) demo./on-site disposal in excavated pit - Max. 10,000 ft. haul	6,400.00	CF	\$0.34	\$2,172.16
Water Treatment Room	10'x20'x20'	Bldg. (MN) demo./on-site disposal in excavated pit - Max. 10,000 ft. haul	4,000.00	CF	\$0.34	\$1,357.60
Sump	39.3'x14'x4' (8")	Demo. and on-site disposal in existing pit, 8 in. thick - Max. 10,000 ft. haul	426.00	SF	\$4.06	\$1,730.24
Clean Oil/Water/Mud out of Sump	12,000 Gallons	Remove sludge, water, and rem. product from tank - 9,000 to 12,000 gal.	1.00	EA	\$432.00	\$432.00
- Dispose of Sludge Off-Site	Assume 2,000 Gals	Dispose of tank sludge off-site - Average	2,000.00	GAL	\$6.80	\$13,600.00
Sanborn Substation No. 2 Transformers	NA	NON-PCB Transformer Removal	3.00	EA	\$2,314.20	\$6,942.60
- Equipment Removal	6'x8'x6'	Bldg. (MN) demo./on-site disposal in excavated pit - Max. 10,000 ft. haul	288.00	CF	\$0.34	\$97.75
- Pad	25'x25'x12"	Demo. and on-site disposal in existing pit, 12 in. thick - Max. 10,000 ft. haul	625.00	SF	\$2.51	\$1,571.44
- Fence	100 LF	Fencing, chain link, including posts and fabric - 8 ft. to 10 ft. high	100.00	LF	\$3.39	\$339.00
Sanborn Overland Conveyor	1500LF	Conveyor, Horizontal Belt 24" Belt, 61.5' Length	24.00	EA	\$3,350.00	\$80,400.00
- Transfer Buildings (4)	10'x20'x25'	Bldg. (MN) demo./on-site disposal in	20,000.00	CF	\$0.34	\$6,788.00

Figure 5: Annotated screenshot of task 130 (3 of 3)

Number of Partial Inspection this Fiscal Year: 8

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		excavated pit - Max. 10,000 ft. haul				
- Pads (4)	10'x20'x12"	Demo. and on-site disposal in existing pit, 12 in. thick - Max. 10,000 ft. haul	800.00	SF	\$2.51	\$2,011.44
- Equipment Removal	10'x20'x25'	Bldg. (MN) demo./on-site disposal in excavated pit - Max. 10,000 ft. haul	1,000.00	CF	\$0.34	\$339.40
Air Compressor Building #2	30'x30'x16'	Bldg. (MN) demo./on-site disposal in excavated pit - Max. 10,000 ft. haul	14,400.00	CF	\$0.34	\$4,887.36
- Pad	30'x30'x6"	Demo. and on-site disposal in existing pit, 6 in. thick - Max. 10,000 ft. haul	900.00	SF	\$1.26	\$1,131.48

Job Hours: 600.00 Subtotal (unadjusted): \$969,611.64 Total Cost (adjusted for location): \$885,255.43



Figure 6: Lower facilities area

Number of Partial Inspection this Fiscal Year: 8

Number of Complete Inspections this Fiscal Year: 3



Figure 7: Upper facilities pad

Number of Partial Inspection this Fiscal Year: 8

Number of Complete Inspections this Fiscal Year: 3



Figure 8: (Reclaimed) middle facilities pad, with reconstructed Elk Creek channel

Number of Partial Inspection this Fiscal Year: 8

Number of Complete Inspections this Fiscal Year: 3



Figure 9: Lower facilities area from north, with reconstructed Elk Creek channel

Number of Partial Inspection this Fiscal Year: 8

Number of Complete Inspections this Fiscal Year: 3



Figure 10: West Valley Fill

Number of Partial Inspection this Fiscal Year: 8

Number of Complete Inspections this Fiscal Year: 3



Figure 11: II West Valley Fill

Number of Partial Inspection this Fiscal Year: 8

Number of Complete Inspections this Fiscal Year: 3



Figure 12: Equipment belonging to Gunnison Energy stored at East Yard

Number of Partial Inspection this Fiscal Year: 8

Number of Complete Inspections this Fiscal Year: 3