

June 17, 2025

Nikie Gagnon
Division of Reclamation, Mining and Safety
1313 Sherman Street, Room 215
Denver, CO 80203
Sent via DRMS ePermitting system

RE: Technical Revision Request - Response for Adequacy Review #1
SITE: Carbon Valley Resource, DRMS Permit M-2001-017

Dear Nikie:

L.G. Everist, Inc. submitted a Technical Revision request for minor changes to the Reclamation Plan of **Carbon Valley Resource, DRMS Permit # M-2001-017** (dated 06/06/25). We have received your **Adequacy Review #1** (dated 06/16/25), and shall address the two items in our Response.

1. The Operator proposes to grade the final slopes to 3H to 1V and remove the requirement to topsoil and seed the upper slopes of the reservoir. Per Rule 6.5(2) and Rule 3.1.5, please demonstrate how the operator will ensure stability of the reclaimed slope, control erosion and prevent slides or other damage to the pit slopes without established vegetation or the placement of rip rap for stabilization.

- The current reclamation plan calls for grading the reservoir's final side slopes at 3:1, then topsoiling and seeding the upper slopes - from the existing surface (top-of-slope) to the water's edge. The final grading of the slopes has been completed.

L.G. Everist will follow the current plan to topsoil and seed the upper slopes - from the existing surface (top-of-slope) to the water's edge. We are retracting the request to change this, and we have revised Carbon Valley Resource's **Exhibit F - Reclamation Plan Map (June-17-2025)**, to show vegetation on the upper slopes of the reservoir.

2. Regarding revegetation around the site, the Operator states that there is an "as is" clause in the contract agreement with the Town of Firestone. Per Rule 3.1.10, in areas where revegetation is part of the reclamation plan, the land shall be revegetated in such a way as to establish a diverse, effective, and long-lasting vegetative cover that is capable of self-regeneration without continued dependence on irrigation, soil amendments or fertilizer, and is at least equal in extent of cover to the natural vegetation of the surrounding area. DRMS is unable to release a site based on an "as is" agreement with the landowner. Please acknowledge the requirement to reclaim all affected lands to the standard described in Rule 3.1.10.

- L.G. Everist acknowledges the requirement to reclaim all affected lands to the standard described in DRMS Rule 3.1.10, which states in part: "...areas where revegetation is part of the reclamation plan, the land shall be revegetated in such a way as to establish a diverse, effective, and long-lasting vegetative cover that is capable of self-regeneration without continued dependence on irrigation, soil amendments or fertilizer, and is at least equal in extent of cover to the natural vegetation of the surrounding area."

**RE: Technical Revision Request for Reclamation Plan changes at
Carbon Valley Resource, DRMS Permit M-2001-017**

If you have additional questions, please feel free to contact Lynn Shults (lmsults@lgeverist.com, mobile-303-514-2778, office-303-286-2247); or Steve O'Brian (environment-inc@startmail.com, 303-423-7297).

Sincerely,

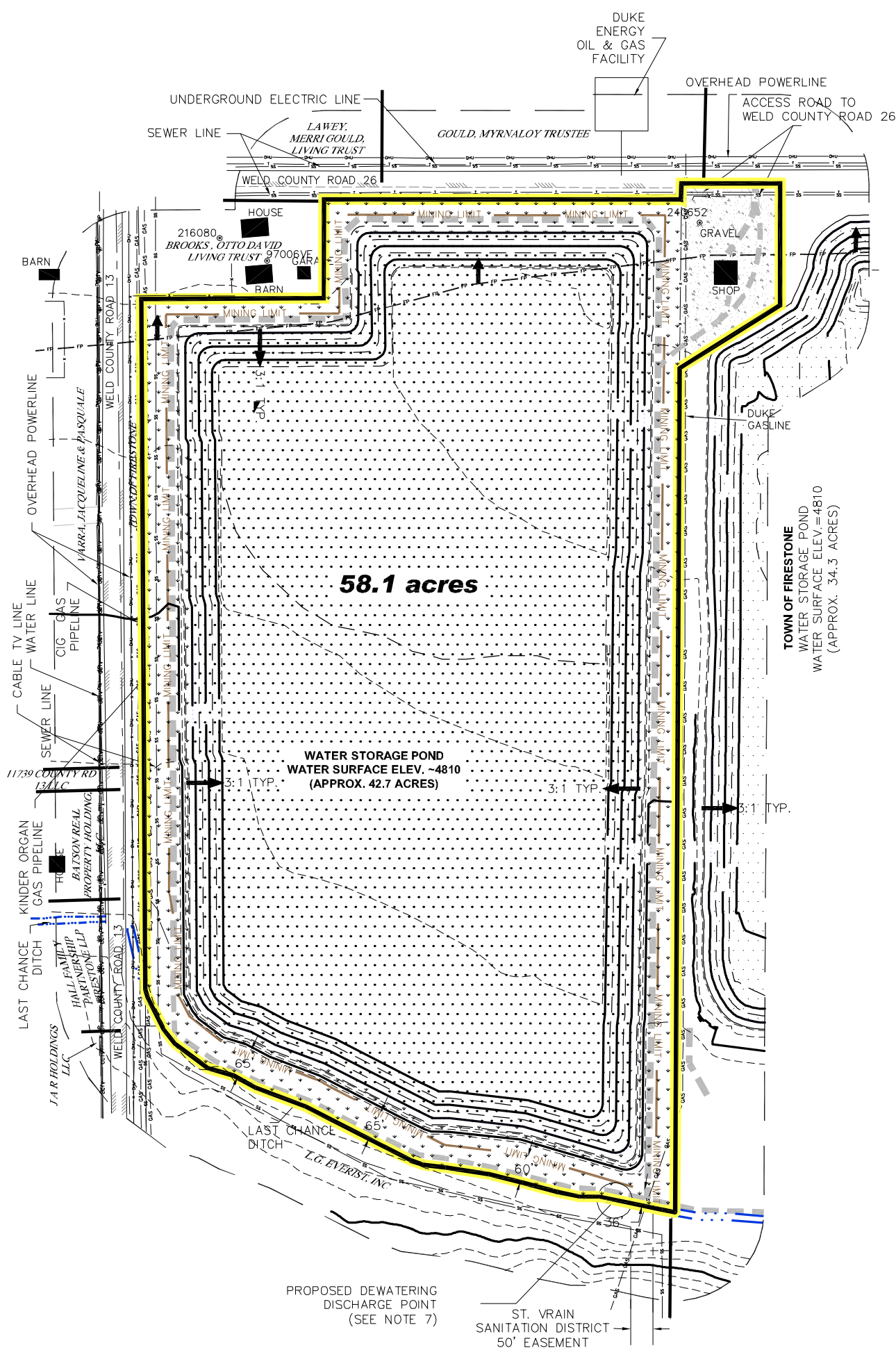


Lynn Mayer Shults
Regulatory Manager

cc: Matthew Noteboom, L.G. Everist, Inc. – Vice President
cc: Steve O'Brian, Environment, Inc. - President

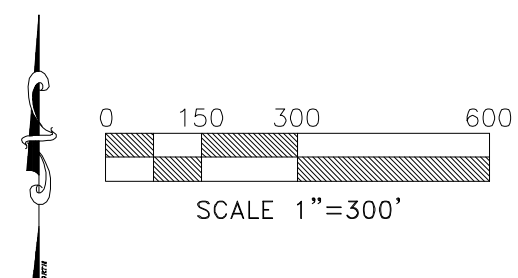
Attachments:

- Exhibit F - Reclamation Plan Map (June-17-2025)



LEGEND	
	PERMIT BOUNDARY/AFFECTED LANDS
	200 FOOT LINE
	MINING LIMITS
	PAVED ROAD
	UNPAVED ROAD
	DITCH/WATER WAY
	FENCE LINE
	GAS PIPELINE
	WATER MAIN
	OVER HEAD UTILITIES
	FIBER OPTIC CABLE
	CABLE TV
	SANITARY SEWER
	UNDERGROUND ELECTRIC
	TELEPHONE LINES
	FLOODPLANE
	TANKS AND PUMPS
	OIL WELL
	WATER WELL
	INDEX CONTOURS
	INTERMEDIATE CONTOURS
	REVEGETATION AREA
	LAKE SURFACE (APPROXIMATE)

LEGAL DESCRIPTION
CARBON VALLEY RESOURCE PROPERTY:
A TRACT OF LAND LOCATED IN PARTS OF THE NE 1/4NW1/4, SW1/4NW1/4 AND NW1/4NW1/4, OF SECTION 6, TOWNSHIP 2 NORTH, RANGE 67 WEST OF THE 6th P.M., WELD COUNTY, COLORADO, LYING NORTH OF THE CENTERLINE OF THE LAST CHANCE DITCH AND SOUTH OF WELD COUNTY ROAD 26 CONTAINING 58.1 ACRES ±



PREPARED BY: **ENVIRONMENT, INC.**
7985 VANCE DR., # 205A
ARVADA, CO 80003
(303) 423-7297
environment-inc@startmail.com

DATE	DESCRIPTION	BY
9/17/2001	ORIGINAL PERMIT ISSUED	LGE/B&G
6/21/2010	PARTIAL RELEASE - FRENCH PARCEL	LGE
10/17/2016	AMENDMENT - ADDED BROOKS FARM PARCEL	LGE/ENV
10/19/2018	PARTIAL RELEASE - LOHMANN PARCEL	LGE/ENV
7/18/2023	PARTIAL RELEASE - REMOVED O&G FACILITY SOUTH END	LGE/ENV
8/04/2023	REMOVED OFFICE, SCALE	LGE/ENV

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(303) 423-7297
environment-inc@startmail.com

L.G. EVERIST INC.
7321 EAST 88TH AVE., SUITE 200
HENDERSON, CO 80640

JOB NO	DATE	SCALE	DRAWN BY	DESIGNED BY	APPROVAL	REV	SHEET
	06/17/2025	1"=300'	SLO	SLO			1

TECHNICAL REVISION - JUNE 17, 2025
MAP EXHIBIT F - RECLAMATION PLAN

CARBON VALLEY RESOURCE
MLRB PERMIT # M-2001-017
WELD COUNTY
COLORADO