

June 26, 2025

Dustin Czapla
Colorado Division of Reclamation, Mining and Safety
1313 Sherman Street, Room 215
Denver, CO 80203
303-866-3567

Delivered Via CDRMS ePermitting

RE: Colorado Stone Quarries, Inc., Pride of America Mine, M-1999-058, Technical Revision 12

Mr. Czapla:

On behalf of Colorado Stone Quarries, Inc. ("CSQ") and the Pride of America Mine ("PAM"), please allow this letter to serve as a request for revision of their 112c Reclamation Permit as Technical Revision 12:

1. Updates to the reclamation portal closures of the site.
2. Updates to the reclamation planting and seeding plan.
3. Response to the February 12, 2025 emailed Division reclamation bond recalculation.

Reclamation Portal Closures

Through their mining process over the last five years, CSQ has effectively cured the need to barricade Portals #1, #2, #3, and #4. Portals #2 and #3 are now backfilled to the road elevation with no grated adit closure or additional safeguarding required. A small 20-ft by 20-ft opening between the Lincoln gallery and the backfilled Portal #3 can be closed with 12 standard quarry blocks placed from the Lincoln side of the mine. Portal #4 is completely closed and covered by the expanded Washington Waste Rock Landform and effectively no longer exists.

Reclamation Planting and Seeding Plans

Hand raking, hydro seeding, hydro mulching, and nursery stock plantings are not needed at the PAM. Current reclamation efforts with simple hand tossing of the approved seed mix have proven to be the most effective form of seed application considering the varied terrain, variable seasonal precipitation, and high alpine environment of the site.

Following initial reclamation efforts at the site following the PAM's 2016 112c conversion, it is expected that nursery stock plantings will have minimal success on any time frame due to the rocky nature of the site and growth medium dominated by fine marble. While aspen and shrubs do occur throughout the site, growth of such species within reclamation areas have been strictly volunteer. CSQ would prefer to allow the site to reclaim with these species on its own natural timeframe and without the requirement of periodic watering as would be needed with nursery stock planting.

CSQ would also like to update the seed mix to reflect the following table. This mix is developed for the local to Marble Roaring Fork Valley Co-op as their Roaring Fork Native Mountain Meadow Mix.

Mixture/Variety – 50# bag	Pure Seed %	Total Value %
Mountain Brome, Bromar	19.69	92.00
Slender Wheatgrass, San Luis	19.25	96.00
Thickspike Wheatgrass, Critana	14.74	98.00
Blue Wildrye, VNS	14.54	93.00
Rocky Mtn Fescue, VNS	12.91	96.00
Idaho Fescue, Lakeview	4.94	98.00
Tufted Hairgrass, VNS	4.67	81.00
Prairie Junegress, Up Sims Mesa	2.25	91.00
Sandberg Bluegrass, VNS	1.97	9000
Big Bluegrass, Sherman	1.94	97.00

Response to Division Bond Recalculation

Re portal closures and safeguarding, the table below shows expected costs associated with the site's current conditions and as described above. The total cost for underground portal safeguarding amounts to \$37,840.79.

Opening Description	Dimensions	Closure Method	Quantity	Unit	Unit Cost	Total Cost
Portal #1	20'W x 20'H	Adit closure - grate only, no door (per opening)	4.00	EA	\$4,707.93	\$18,831.72
Portal #2	60'W x 40'H	Backfilled	0.00	EA	\$0.00	\$0.00
Portal #3	40'W x 20'H	Backfilled	0.00	EA	\$0.00	\$0.00
Portal #4	10x10x10	Backfilled, covered	0.00	EA	\$0.00	\$0.00
Portals #5-7	10 x 10 x 10 (4)	Adit closure - backfilling (per opening)	4.00	EA	\$3,649.41	\$14,597.64
Tunnel #5	8'W x 8'H	Adit closure - grated door (per opening)	1.00	EA	\$4,411.43	\$4,411.43

Re revegetation work, we propose an updated 'Revegetation Work' cost total to equal \$1,078.57/acre (seed and weed mitigation) for 8 acres. This would total \$8,628.56 (initial) + \$2,157.14 (reseeding) = \$10,785.70 (total).

No changes are proposed to the sections titled: demolition work, truck/loader teamwork, hydraulic excavator work, bulldozer work, and equipment mobilization/demobilization.

The above changes reflect a cost difference of >\$230,000.00 relative to the Division's January 2025 proposed reclamation bond update. Total safeguarding underground openings cost: \$37,840.79 (decreased from Division updated \$188,494.55) and total revegetation work \$10,785.70 (decreased from \$72,910.00). CSQ proposes keeping the current bond unchanged and maintaining the final total value of \$629,887.00.

Please do not hesitate to contact me with questions and we look forward to receiving your review.

Cheers,



Katie Todt
Geologist and Senior Consultant
Lewicki & Associates, PLLC
(303) 346-5196
katie@lewicki.biz

Ec:

Giuseppe Telara, CSQ
Daniel Penfield, CSQ