



June 27, 2025

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

Re: M-1978-011 Buffalo 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 Buffalo Mine dated April 30, 2025. The inspection noted 2 problems:

***INSPECTION TOPIC: Right of Entry***

***PROBLEM #1: Failure to maintain legal right of entry for all Owners of Record to the affected lands pursuant to Rule 6.4.14.***

***CORRECTIVE ACTIONS: The operator must provide documentation of their legal right to enter to conduct mining and reclamation on the affected lands. Specifically, the operator shall provide demonstration of their legal right to enter the Phase IV portion of the permit area to, at a minimum, conduct reclamation of the existing mining disturbance. This may include a copy of a lease or a signed statement by the landowner and acknowledged by a Notary Public stating that the operator has the legal right to enter to conduct mining and reclamation.***

**Response:**

GSB has reviewed the Liberty Land and Cattle Company lease dated April 30, 1987 for the Phase IV property. Section 14 of the lease states, "Lessee may enter said premises after the termination of this Lease for the purpose of reclamation consistent with directives of governmental agencies." GSB believes that we are allowed to enter the property to perform reclamation.

***INSPECTION TOPIC: Reclamation Success***

***PROBLEM #2: Failure to follow approved reclamation plan, or current reclamation plan needs to be updated and clarified pursuant to C.R.S. 34-32.5-116. The operator must follow the approved reclamation plan or provide sufficient information to describe or identify how the operator intends to conduct reclamation.***

***CORRECTIVE ACTIONS: The operator shall submit a Technical Revision, with the required \$216 revision fee, to include a reclamation plan and an updated bond estimate for reclaiming the existing mining disturbance in Phase IV.***

**Response:**

GSB has reviewed the Phase IV property and desires to keep the entire Phase IV property under the permit. This will require updating the mine plan and reclamation plan for this property which will require updating the topography, drawing maps, drafting a plan, and conferring with the current landowner(s). Therefore, GSB is respectfully requesting an extension to December 31, 2025 and will strive to get this sooner .



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