



July 3, 2025

Jodi Schreiber
PFM Consulting LLC
1774 North Cougar Drive
Pueblo West, CO 81007

**Re: Bradford Mesa Quarry, Permit No. M-2019-046, Technical Revision (TR-1),
Adequacy Review-4**

Dear Ms. Schreiber:

The Division of Reclamation, Mining and Safety (Division) is in the process of reviewing the above referenced Technical Revision and your responses to the Division's Third Adequacy Review to ensure that it adequately satisfies the requirements of the Colorado Mined Land Reclamation Act (§ § 34-32.5-101-34-32.5-125) (Act) and the Rules and Regulations for the Extraction of Construction Materials (Rules). During review of the material submitted, the Division determined that the following issue(s) of concern need to be adequately addressed before the Technical Revision can be considered for approval. Please provide the following:

- ✚ **The following item has not been addressed thoroughly from the Division's Third Adequacy Review.** Through using the Applicant's Landowner Map Exhibit C.1 as an overlay, it appears that the mining area depicted by the phase boundary on the map only equates to approximately 282 acres (see Figure 1 below). The Applicant stated within the narrative that the area to be mined and reclaimed consists of 569.1 acres. The Applicant states that an additional 16 acres will be disturbed for the haul road but will remain in place after reclamation. Please address and respond to item 1 below to explain and/or correct the acreage discrepancies.



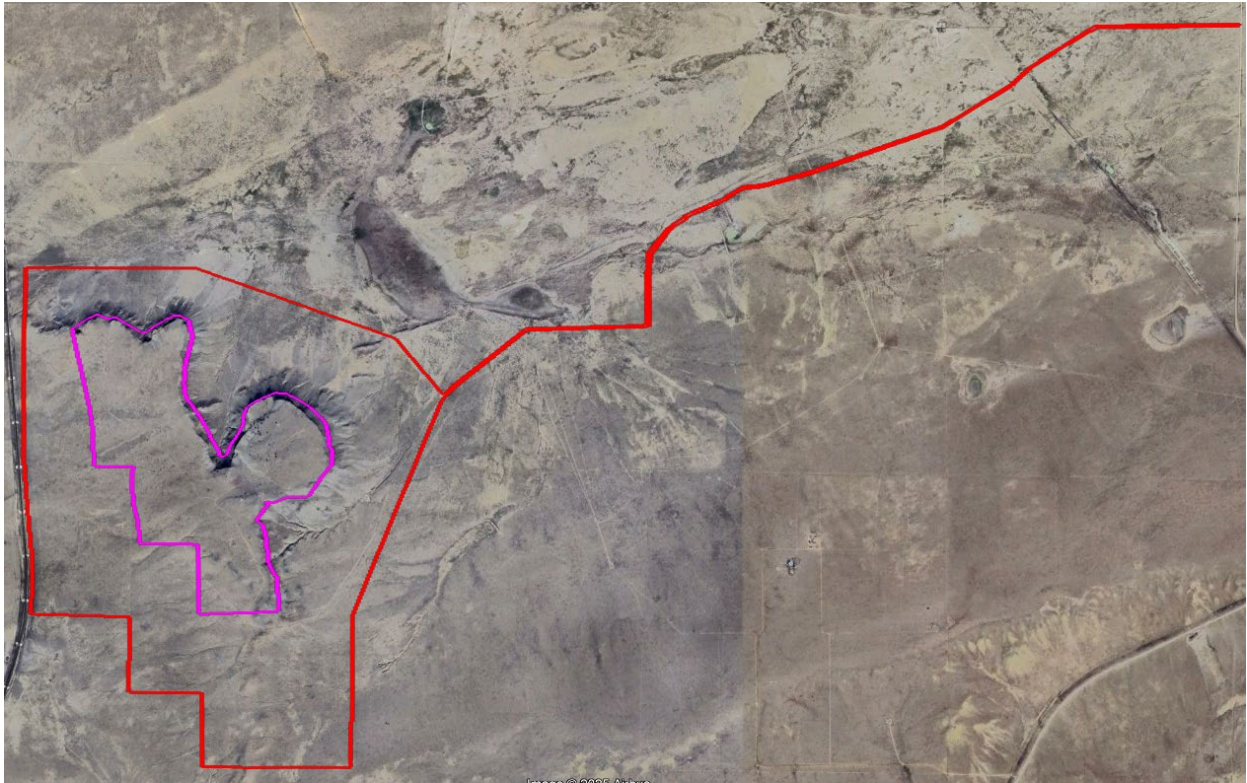


Figure 1: The red polygon indicates the Division's estimate of the permit boundary. The pink polygon was created through overlaying the Applicant's Landowner's Map Exhibit C.1 into Google Earth. The pink boundary represents the areas marked as the phase/mining areas proposed through TR1, and equates to approximately 282 acres.

1. The Applicant has provided a new mining plan map with new phases. The site is currently permitted to affect a total of 569.1 acres.
 - (a) Please revise the map to clearly mark the entirety of the affected land boundary and ensure it equals 569.1 acres within the currently approved affected area. If the affected area is proposed to be reduced, an acreage reduction revision must occur prior to the approval of this TR.
 - (b) Please update the Mining Plan and Reclamation Plan narratives to describe the total affected acres proposed through the TR1, including acres for the haul road, phased mining areas, processing areas if separate from mining areas, etc.
 - (c) Please also update the Exhibit L narrative to reflect the above acreage descriptions (see the screenshot from the last adequacy review and the currently approved Exhibit L below).

Please submit your response(s) to the above listed issue(s) by at least three days prior to the decision date to allow the Division sufficient time for review. If you cannot address the above

issues by the decision date, please request an extension to the decision due date, in writing, to ensure adequate time for the Division to review materials. A **decision due date of July 8, 2025** has been set. If any adequacy issues remain by the decision due date the Division may deny your request. The Division will continue to review your Technical Revision and will contact you if additional information is needed.

If you have any questions, please send me an email at amber.gibson@state.co.us, or call me at 720-836-0967.

Sincerely,



Amber M. Gibson
Environmental Protection Specialist

Cc: Rock Southway via Paul Bottini, Southway Construction Company, Inc.
Jared Ebert, Senior EPS, DRMS