



COLORADO

Division of Reclamation,
Mining and Safety


Department of Natural Resources

MINERALS PROGRAM INSPECTION REPORT

PHONE: (303) 866-3567

The Division of Reclamation, Mining and Safety has conducted an inspection of the mining operation noted below. This report documents observations concerning compliance with the terms of the permit and applicable rules and regulations of the Mined Land Reclamation Board.

MINE NAME: E 8th Street Operation	MINE/PROSPECTING ID#: M-2000-082	MINERAL: Sand and gravel	COUNTY: Weld
INSPECTION TYPE: Monitoring	WEATHER: Clear	INSP. DATE: May 28, 2025	INSP. TIME: 09:00
OPERATOR: Superior Oilfield Services Co., LTD	OPERATOR REPRESENTATIVE: Jim McFarland	TYPE OF OPERATION: 112c - Construction Regular Operation	

REASON FOR INSPECTION: Normal I&E Program	BOND CALCULATION TYPE: Complete Bond	BOND AMOUNT: \$61,870.00
DATE OF COMPLAINT: NA	POST INSP. CONTACTS: None	JOINT INSP. AGENCY: None
INSPECTOR(S): Nikie Gagnon	INSPECTOR'S SIGNATURE: 	SIGNATURE DATE: July 9, 2025

The following inspection topics were identified as having Problems or Possible Violations. OPERATORS SHOULD READ THE FOLLOWING PAGES CAREFULLY IN ORDER TO ASSURE COMPLIANCE WITH THE TERMS OF THE PERMIT AND APPLICABLE RULES AND REGULATIONS. If a Possible Violation is indicated, you will be notified under separate cover as to when the Mined Land Reclamation Board will consider possible enforcement action.

INSPECTION TOPIC: Revegetation

PROBLEM 1: There are state-listed noxious weeds present on site. This is a problem for failure to employ weed control methods for state listed noxious weed species within the permitted area, and to reduce the spread of weeds to nearby areas as required by Section 3.1.10 (6) of the rule.

CORRECTIVE ACTIONS: The operator shall develop a weed control and management plan in accordance with Section 3.1.10 (6) of the Rule. This plan should be developed in consultation with the county extension agency, or weed control district office and should include specific control measures to be applied, a schedule for when control measures will be applied and a post-treatment monitoring plan. This weed control plan shall be submitted to the Division as a Technical Revision to the approved plan with the appropriate Technical Revision fee of \$216.00 by the corrective action date.

CORRECTIVE ACTION DUE DATE: 8/08/25

INSPECTION TOPIC: Financial Warranty

PROBLEM #3: The financial warranty is not adequate to reclaim the site in accordance with the approved reclamation plan. This is a failure to maintain the proper financial warranty amount to complete reclamation of the affected lands pursuant to C.R.S. 34-32.5-117(4)(b) of the Act.

CORRECTIVE ACTIONS: Enclosed is the reclamation cost estimate, by the corrective action due date, please submit any questions you have regarding the estimate to the Division. The operator shall submit adequate

financial warranty, as determined by the Division. The Division will be sending a separate surety increase notice to the operator regarding the required increase of the financial warranty. The operator will have 60 days from the date on the surety increase notice to post the additional financial warranty.

CORRECTIVE ACTION DUE DATE: 7/23/25

OBSERVATIONS

The 8th Street gravel mine was inspected by Nikie Gagnon, representing the Division of Reclamation, Mining and Safety (Division), as part of the Division's normal monitoring inspection program. Jim McFarland, representing Superior Oilfield Services (Operator), accompanied the Division during the inspection. The site is located half a mile east of Greeley on 8th Street, just east of Highway 85. A mine sign was posted at the entrance to the site, as required by Rule 3.1.12(1), and metal posts mark the permit boundary in the corners. The Cache La Poudre River flows adjacent to the site, on the south side. The permit area is 48.75 acres and the post mining land use is recreation.

Hydrologic Balance

The site was mined in three phases. Mining is complete at the site and the Phase 1 area was released in 2012. Phases II and III were mined leaving two unlined, open water ponds divided by the Ogilvy irrigation ditch. The slopes of the two ponds are graded to 3H:1V. A gravel road will remain around the perimeter of the ponds for the landowner. Water was observed in both ponds during this inspection. The site is owned and operated by the Ogilvy Irrigating and Land Company and pursuant to the purchase agreement, Ogilvy has the long-term augmentation responsibility for the site. The Operator is required to sample three monitoring wells (MW-2, MW-3, and MW-4) monthly and submit the report to the Division with the annual report. The last report was submitted and accepted on May 30, 2025.

Revegetation Success

The operator is working on revegetation of the site. Initial topsoiling and seeding were completed in 2021. During the inspection, the Operator stated that they have re-seeded some of the areas four times and the desired vegetation is not yet established. During the inspection, the Division observed dense annual weeds, primarily kochia, growing in rows across the site (Photos 1-3). The kochia provides temporary cover and minimizing erosion, however, the desired native grasses are not filling in across the site. Additionally, some areas are still bare ground. According to the operator, the site was previously utilized as a cattle feedlot. Based on the vegetation patterns and density, high levels of nitrogen and salts in the soil are likely helping the annual weeds thrive.

Although much of the site is kochia, some desired grasses were observed within the weeds, particularly on the south side of the ponds, along the river. The east end of the site is drier and more bare ground was observed near the entrance to the site where the former stockpiles were located (Photo 4). According to the approved reclamation plan, two seed mixes are approved for the shoreline and upland areas, a Wet Meadow Range mix and Overflow Gravel Breaks Range mix. Additionally, the reclamation plan calls for planting Reed Canary grass along the shorelines of the ponds. The Division recommended that the operator contact the local soil conservation service to determine the best reclamation seed mix and other elements that may need to be incorporated into the soil to ensure revegetation success. **Once the best management practices for reestablishing vegetation across the site are determined, the Operator will need to submit a Technical Revision to the Division to update the reclamation plan.**

Additionally, the approved reclamation plan describes a Cache La Poudre Trail corridor which runs along the south side within the permit area. This corridor is preserved as a buffer zone along the northern shore of the river. **According to the plan, trees and shrubs will be planted to enhance riparian habitat and preserve the trail corridor along the river. As of the date of this inspection, the trees and shrubs have not been planted.**

Weed Control

The approved reclamation plan states that weeds will be mowed and controlled, however, no specific weed control plan was found in the permit file. During the inspection, the Division observed annual weeds dominating the entire site. Areas of downy brome (cheatgrass) were observed along the bank of the river and on the south sides of the reservoirs within the permit area (Photos 11-12). **Downy brome is a list C species requiring treatment. As stated above in Problem #1 above, the operator shall develop a weed control and management plan in accordance with Section 3.1.10 (6) of the Rule. This plan should be developed in consultation with the county extension agency, or weed control district office and should include specific control measures to be applied, a schedule for when control measures will be applied and a post-treatment monitoring plan. This weed control plan shall be submitted to the Division as a Technical Revision to the approved plan with the appropriate Technical Revision fee of \$216.00 by the corrective action date.**

Financial Warranty

The Division holds a \$61,870.00 cash bond for the site. After the inspection, the Division estimated the reclamation liability at the site to be \$79,876.00 which is \$18,006.00 more than the currently held financial warranty. **As noted in Problem #2 above, the Division's reclamation cost estimate is enclosed with this report for the Operator's review. The Division requests that any questions or concerns regarding the estimated liability level be forwarded to the Division by July 16, 2025.** The Division may issue a surety increase revision after August 9, 2025. In accordance with Rule 4.2.1(2), Superior Oilfield Services will have sixty (60) days from the date of the notice of surety increase to provide the additional financial warranty.

This concludes the Division's inspection report. A subset of the photographs taken during inspection are attached. Any questions or comments regarding this inspection report should be forwarded to Nikie Gagnon at the Colorado Division of Reclamation, Mining and Safety via telephone at 720-527-1640, or email at nikie.gagnon@state.co.us.

PHOTOGRAPHS



Photo 1: Looking northwest across the Phase III Pond on the east side of the permit area.



Photo 2: Looking at the shoreline of the Phase III Pond. The slopes are graded 3H:1V. Annual weeds dominate the slopes.



Photo 3: Looking north across the upland area adjacent to the Phase III Pond on the east side of the permit area. Dense kochia is growing in rows in this area.



Photo 4: Looking south across the former stockpile near the entrance on the east side. Bare ground observed here.



Photo 5: Looking northwest across the Phase II Pond on the west side of the permit area.



Photo 6: Looking north down the shoreline of the Phase II Pond on the west side of the permit area. Shoreline vegetation is primarily kochia and other annual weeds.



Photo 7: Ogilvy irrigation ditch which runs between the Phase II and Phase III ponds.



Photo 8: Looking down the gravel road that runs between the two ponds.



Photo 9: Some native grasses observed growing within the weedy vegetation.



Photo 10: Native grasses observed growing along the south side of the Phase II Pond.



Photo 11: Cache La Poudre River adjacent to the south side of the permit area. Riparian buffer area observed here. Downy brome (cheatgrass) noted here (red arrow).



Photo 12: Downy brome (cheatgrass) observed along the perimeter road on the south side.



Figure 1: Google imagery showing permit area. Purple line is the permit boundary.

GENERAL INSPECTION TOPICS

The following list identifies the environmental and permit parameters inspected and gives a categorical evaluation of each

(AR) RECORDS----- <u>Y</u>	(FN) FINANCIAL WARRANTY----- <u>N</u>	(RD) ROADS----- <u>N</u>
(HB) HYDROLOGIC BALANCE----- <u>Y</u>	(BG) BACKFILL & GRADING----- <u>Y</u>	(EX) EXPLOSIVES----- <u>N</u>
(PW) PROCESSING WASTE/TAILING---- <u>N</u>	(SF) PROCESSING FACILITIES----- <u>N</u>	(TS) TOPSOIL----- <u>N</u>
(MP) GENL MINE PLAN COMPLIANCE- <u>N</u>	(FW) FISH & WILDLIFE----- <u>N</u>	(RV) REVEGETATION---- <u>PB</u>
(SM) SIGNS AND MARKERS----- <u>Y</u>	(SP) STORM WATER MGT PLAN---- <u>N</u>	(RS) RECL PLAN/COMP-- <u>Y</u>
(ES) OVERBURDEN/DEV. WASTE----- <u>N</u>	(SC) EROSION/SEDIMENTATION--- <u>Y</u>	(ST) STIPULATIONS----- <u>N</u>
(AT) ACID OR TOXIC MATERIALS----- <u>N</u>	(OD) OFF-SITE DAMAGE----- <u>N</u>	

Y = Inspected / N = Not inspected / NA = Not applicable to this operation / PB = Problem cited / PV = Possible violation cited

Inspection Contact Address

Jim McFarland
Superior Oilfield Services Co., LTD
2986 W. 29th St. #12-13
Greeley, CO 80631

Enclosure - Reclamation Cost Estimate

CC: Jared Ebert, Senior EPS, DRMS

COST SUMMARY WORK

Task description: Reclamation Cost Estimate

Site: E 8th Street Operation

Permit Action: 2025 Inspection

Permit/Job#: M2000082

PROJECT IDENTIFICATION

Task #: 000

State: Colorado

Abbreviation: None

Date: 7/9/2025

County: Weld

Filename: M082-000

User: NCG

Agency or organization name: DRMS

TASK LIST (DIRECT COSTS)

Task	Description	Form Used	Fleet Size	Task Hours	Cost
001	Revegetate Upland - 27 ac	REVEGE	1	20.00	\$41,084
002	Revegetate Shoreline - 3 Acres	REVEGE	1	40.00	\$14,364
003	Mob/Demob	MOBILIZE	1	3.33	\$3,268
<u>SUBTOTALS:</u>				63.33	\$58,716

INDIRECT COSTS

OVERHEAD AND PROFIT:

Liability insurance: 2.02

Total = \$1,186

Performance bond: 1.05

Total = \$617

Job superintendent: 31.66

Total = \$2,379

Profit: 10.00

Total = \$5,872

TOTAL O & P = \$10,053

CONTRACT AMOUNT (direct + O & P) = \$68,769

LEGAL - ENGINEERING - PROJECT MANAGEMENT:

Financial warranty processing (legal/related costs): \$0

Total = \$0

Engineering work and/or contract/bid preparation: 8.59

Total = \$5,907

Reclamation management and/or administration: 5.00

\$3,438

CONTINGENCY: 3.00

Total = \$1,761

TOTAL INDIRECT COST = \$21,160

TOTAL BOND AMOUNT (direct + indirect) = \$79,876

REVEGETATION WORKTask description: Revegetate Upland - 27 acSite: E 8th Street OperationPermit Action: 2025 InspectionPermit/Job#: M2000082**PROJECT IDENTIFICATION**Task #: 001State: ColoradoAbbreviation: NoneDate: 7/9/2025County: WeldFilename: M082-001User: NCGAgency or organization name: DRMS**FERTILIZING****Materials**

Description	Units / Acre	Unit	Cost / Unit	Cost /Acre
0-20-20, 4-8-12, 10-10-10	5.00	pound	\$0.65	\$3.27
			Total Fertilizer Materials Cost/Acre	\$3.27

Application

Description	Cost /Acre
Tractor towed spreader (MEANS 32 01 90.13 0120)	\$46.17
Total Fertilizer Application Cost/Acre	\$46.17

TILLING

Description	Cost /Acre
Disc harrowing, 6" deep (MEANS 32 91 13.23 6100)	\$114.13
Weed control spraying (MEANS 31 31 16.13 3100)	\$338.80
Total Tilling Cost/Acre	\$452.93

SEEDING

Seed Mix	Rate – PLS LBS / Acre	Seeds per SQ. FT	Cost /Acre
Big Bluestem - Kaw	5.50	16.41	\$88.37
Switchgrass - Blackwell	2.50	22.33	\$33.84
Little Bluestem - Pastura	3.50	20.89	\$56.86
Sideoats Grama - Vaughn	4.50	14.77	\$113.30
Western Wheatgrass - Barton	8.00	20.20	\$76.96
Totals Seed Mix	24.00	94.61	\$369.34

Application

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Description	Cost /Acre
Drill Seeding (DRMS Survey Cost)	\$242.30
Total Seed Application Cost/Acre	\$242.30

MULCHING and MISCELLANEOUS

Materials

Description	Units / Acre	Unit	Cost / Unit	Cost /Acre
Straw, delivered	2.00	TON	\$504.56	\$1,009.12
Total Mulch Materials Cost/Acre				\$1,009.12

Application

Description	Cost /Acre
Weed spray, hand, aquatic area, nox. [DMG]	\$203.77
Total Mulch Application Cost/Acre	\$203.77

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:	<u>27</u>	Cost /Acre:	<u>\$2,326.90</u>
Estimated Failure Rate:	<u>25%</u>	Cost /Acre*:	<u>\$1,824.53</u>
*Selected Replanting Work Items:	<u>SEEDING,MULCHING</u>		
Initial Job Cost:	<u>\$62,826.30</u>		
Reseeding Job Cost:	<u>\$12,315.58</u>		
Total Job Cost:	<u>\$75,142</u>		
Job Hours:	<u>20.00</u>		

REVEGETATION WORKTask description: Revegetate Shoreline - 3 AcresSite: E 8th Street OperationPermit Action: 2025 InspectionPermit/Job#: M2000082**PROJECT IDENTIFICATION**Task #: 002State: ColoradoAbbreviation: NoneDate: 7/9/2025County: WeldFilename: M082-002User: NCGAgency or organization name: DRMS**FERTILIZING****Materials**

Description	Units / Acre	Unit	Cost / Unit	Cost /Acre
0-20-20, 4-8-12, 10-10-10	5.00	pound	\$0.65	\$3.27
			Total Fertilizer Materials Cost/Acre	\$3.27

Application

Description	Cost /Acre
Tractor towed spreader (MEANS 32 01 90.13 0120)	\$46.17
Total Fertilizer Application Cost/Acre	\$46.17

TILLING

Description	Cost /Acre
Disc harrowing, 6" deep (MEANS 32 91 13.23 6100)	\$114.13
Weed control spraying (MEANS 31 31 16.13 3100)	\$338.80
Total Tilling Cost/Acre	\$452.93

SEEDING

Seed Mix	Rate – PLS LBS / Acre	Seeds per SQ. FT	Cost /Acre
Big Bluestem - Kaw	5.50	16.41	\$88.37
Indiangrass - Cheyenne	5.00	15.24	\$62.99
Switchgrass - Blackwell	2.50	22.33	\$33.84
Cordgrass, Prairie	15.00	63.02	\$1,426.09
Western Wheatgrass - Barton	8.00	20.20	\$76.96
Totals Seed Mix	36.00	137.20	\$1,688.25

Application

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Description	Cost /Acre
Drill Seeding (DRMS Survey Cost)	\$242.30
Total Seed Application Cost/Acre	\$242.30

MULCHING and MISCELLANEOUS**Materials**

Description	Units / Acre	Unit	Cost / Unit	Cost /Acre
Hay, delivered	2.00	TON	\$504.56	\$1,009.12
Total Mulch Materials Cost/Acre				\$1,009.12

Application

Description	Cost /Acre
Crimping, with tractor {DMG survey data}	\$239.35
Weed spray, hand, aquatic area, nox. [DMG]	\$203.77
Total Mulch Application Cost/Acre	\$443.12

NURSERY STOCK PLANTING

Common Name	No / Acre	Type and Size	Planting Cost	Fertilizer Pellet Cost	Cost /Acre
Cottonwood, Narrowleaf	10	Small potted, 2.25 inch diameter (MEANS)	\$5.73	\$0.00	\$57.30
Totals Nursery Stock Cost / Acre					\$57.30

JOB TIME AND COST

No. of Acres:	3	Cost /Acre:	\$3,942.46
Estimated Failure Rate:	25%	Cost /Acre*:	\$3,382.79
*Selected Replanting Work Items:	SEEDING,MULCHING		
Initial Job Cost:	\$11,827.38		
Reseeding Job Cost:	\$2,537.09		
Total Job Cost:	\$14,364		
Job Hours:	40.00		

EQUIPMENT MOBILIZATION/DEMOBILIZATIONTask description: **Mob/Demob**Site: **E 8th Street Operation**Permit Action: 2025 InspectionPermit/Job#: M2000082**PROJECT IDENTIFICATION**Task #: 003State: ColoradoAbbreviation: NoneDate: 7/9/2025County: WeldFilename: M082-003User: NCGAgency or organization name: DRMS**EQUIPMENT TRANSPORT RIG COST**Shift basis: 1 per dayCost Data Source: CRG DataTruck Tractor Description: GENERIC ON-HIGHWAY TRUCK TRACTOR, 6X4, DIESEL POWERED,
400 HP (2ND HALF, 2006)Truck Trailer Description: GENERIC FOLDING GOOSENECK, DROP DECK EQUIPMENT
TRAILER (25T, 50T, AND 100T)**Cost Breakdown:**

Available Rig Capacities	0-25 Tons	26-50 Tons	51+ Tons
Ownership Cost/Hour:	\$21.47	\$38.32	\$48.96
Operating Cost/Hour:	\$31.47	\$60.11	\$65.86
Operator Cost/Hour:	\$22.52	\$22.52	\$22.52
Helper Cost/Hour:	\$0.00	\$22.25	\$22.25
Total Unit Cost/Hour:	\$75.46	\$143.20	\$159.59

NON ROADABLE EQUIPMENT:

Machine Description	Weight/ Unit (TONS)	Owner ship Cost/hr/ unit	Haul Rig Cost/hr/unit	Fleet Size	Haul Trip Cost/hr/ fleet	Return Trip Cost/hr/ fleet	DOT Permit Cost/ fleet
Cat D8T - 8SU	47.71	\$179.60	\$143.20	1	\$322.80	\$143.20	\$250.00
Drill/Broadcast Seeder with Tractor	25.00	\$5.99	\$75.46	1	\$81.45	\$75.46	\$250.00
CAT 14M	23.57	\$101.88	\$75.46	1	\$177.34	\$75.46	\$250.00
Subtotals:					\$581.59	\$294.12	\$750.00

ROADABLE EQUIPMENT:

Machine Description	Total Cost/hr/ unit	Fleet Size	Haul Trip Cost/hr/ fleet	Return Trip Cost/hr/ fleet
Light Duty Pickup, 4x4, 1 T. Crew	\$31.11	1	\$31.11	\$31.11
Subtotals:			\$31.11	\$31.11

EQUIPMENT HAUL DISTANCE and Time

Nearest Major City or Town within project area region:	<u>GREELEY</u>	
Total one-way travel distance:	<u>10.00</u>	miles
Average Travel Speed:	<u>30.00</u>	mph

Total Non-Roadable Mob/Demob Cost *	<u>\$3,246.99</u>
** two round trips with haul rig:	
Total Roadable Mob/Demob Cost **	<u>\$20.74</u>
** one round trip, no haul rig:	

Transportation Cycle Time:

	Non-Roadable Equipment	Roadable Equipment
Haul Time (Hours):	<u>0.33</u>	<u>0.33</u>
Return Time (Hours):	<u>0.33</u>	<u>0.33</u>
Loading Time (Hours):	<u>0.50</u>	<u>NA</u>
Unloading Time (Hours):	<u>0.50</u>	<u>NA</u>
Subtotals:	<u>1.67</u>	<u>0.67</u>

JOB TIME AND COST

Total job time:	<u>3.33</u>	Hours
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Total job cost:	<u>\$3,268</u>
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