



August 13, 2025

Nathan Barton
Wasteline Inc
PO Box 88
Cortez, CO 81321

RE: Granger Pit, File No. #M-2025-034 Adequacy Review

Dear Mr. Barton:

The Division of Reclamation, Mining and Safety (Division) is in the process of reviewing the above referenced Conversion request in order to ensure that it adequately satisfies the requirements of the Colorado Land Reclamation Act for the Extraction of Construction Materials (Act) and the associated Mineral Rules and Regulations of the Colorado Mined Land Reclamation Board for the Extraction of Construction Materials (Rules). During review of the material submitted, the Division determined that the following issue(s) of concern shall be adequately addressed before a decision can be rendered.

Exhibit C

1. Per 6.3.3(d) please provide the thickness of the deposit to be mined. If the depth is unknown, providing an estimated range is acceptable.

Exhibit E

2. Per 6.3.5(3)(d) and (e) please state the average thickness of the replaced overburden and topsoil on the reclamation map.

Public Notice

3. Per 1.6.2(1)(g) please provide proof of Public Notice publication. Proof may consist of either a copy of the last newspaper publication, to include the date published, or a notarized statement from the paper.

Please submit your response(s) to the above listed issue(s) by Friday, August 22, 2025 in order to allow the Division sufficient time for review prior to the Decision Date of August 29, 2025.

The Division will continue to review your application and will contact you if additional information is needed.

If you require additional information, or have questions or concerns, please contact me at the Division's Grand Junction Field Office.



Sincerely,



Todd Jesse

Environmental Protection Specialist
Department of Natural Resources
Division of Reclamation, Mining and Safety
101 South 3rd, Suite 301
Grand Junction, CO 81501
Phone: (720)688-0626

Cc: Travis Marshall, DRMS
Thomas Wade O'Rourke

COST SUMMARY WORK

Task description: _____

Site: Granger Pit

Permit Action: New Permit

Permit/Job#: M2025034

PROJECT IDENTIFICATION

Task #: 000

State: Colorado

Abbreviation: None

Date: 8/1/2025

County: Rio Grande

Filename: M034-000

User: TJ1

Agency or organization name: DRMS

TASK LIST (DIRECT COSTS)

Task	Description	Form Used	Fleet Size	Task Hours	Cost
01a	Backfill and Grade	DOZER	1	5.84	\$1,917
02a	Ripping	RIPPER	1	5.14	\$1,819
03a	Spread Topsoil	DOZER	1	3.22	\$1,057
04a	Seeding	REVEGE	1	0.00	\$5,380
05a	Primary Mobilization	MOBILIZE	1	0.62	\$1,201
05b	Secondary Mobilization	MOBILIZE	1	0.62	\$556
<u>SUBTOTALS:</u>				15.44	\$11,930

INDIRECT COSTS

OVERHEAD AND PROFIT:

Liability insurance:	2.02	Total =	\$241
Performance bond:	1.05	Total =	\$125
Job superintendent:	5.00	Total =	\$376
Profit:	10.00	Total =	\$1,193

TOTAL O & P = \$1,935

CONTRACT AMOUNT (direct + O & P) = \$13,865

LEGAL - ENGINEERING - PROJECT MANAGEMENT:

Financial warranty processing (legal/related costs):	<u>\$500</u>	Total =	<u>\$500</u>
Engineering work and/or contract/bid preparation:	<u>4.25</u>	Total =	<u>\$589</u>
Reclamation management and/or administration:	<u>5.00</u>		<u>\$693</u>

CONTINGENCY: 3.00 Total = \$358

TOTAL INDIRECT COST = \$4,075

TOTAL BOND AMOUNT (direct + indirect) = \$16,005

BULLDOZER WORKTask description: **Backfill and Grade**Site: **Granger Pit** Permit Action: **New Permit** Permit/Job#: **M2025034****PROJECT IDENTIFICATION**

Task #: **01A** State: **Colorado** Abbreviation: **None**
 Date: **8/1/2025** County: **Rio Grande** Filename: **M034-01a**
 User: **TJ1**

Agency or organization name: **DRMS****HOURLY EQUIPMENT COST**

Basic Machine: **Cat D8T - 8SU**
 Horsepower: **310**
 Blade Type: **Semi-Universal**
 Attachment: **NA**
 Shift Basis: **1 per day**
 Data Source: **(CRG)**

Cost Breakdown:

		<u>Utilization %</u>
Ownership Cost/Hour:	\$179.60	NA
Operating Cost/Hour:	\$110.45	100
Ripper own. Cost/Hour:	\$0.00	NA
Ripper op. Cost/Hour:	\$0.00	0
Operator Cost/Hour:	\$38.02	NA

Total unit Cost/Hour: **\$328.07**
 Total Fleet Cost/Hour: **\$328.07**

MATERIAL QUANTITIES

Initial Volume: **3,230**
 Swell factor: **1.000**
 Loose volume: **3,230 LCY**

Source of estimated volume: **Division of Reclamation, Mining & Safety**
 Source of estimated swell factor: **Cat Handbook**

HOURLY PRODUCTION

Average push distance: **50 feet**
 Unadjusted hourly production: **1,400.0 LCY/hr**

Materials consistency description: **Consolidated stockpile 1.0**

Average push gradient: **0 %**
 Average site altitude: **8,075 feet**

Material weight: **2,900 lbs/LCY**Weight description: **Decomposed rock - 50% Rock, 50% Earth****Job Condition Correction Factor**

		<u>Source</u>
Operator Skill:	0.750	(AVG.)
Material consistency:	1.000	(CAT HB)
Dozing method:	1.000	(GEN.)
Visibility:	1.000	(AVG.)

Job efficiency:	0.830	(1 SHIFT/DAY)
Spoil pile:	0.800	(FND-RF)
Push gradient:	1.000	(CAT HB)
Altitude:	1.000	(CAT HB)
Material Weight:	0.793	(CAT HB)
Blade type:	1.000	(PAT)

Net correction: 0.3949

Adjusted unit production: 552.86 LCY/hr

Adjusted fleet production: **552.86** LCY/hr

JOB TIME AND COST

Fleet size: 1 Dozer(s)

Unit cost: \$0.593/LCY

Total job time: **5.84** Hours

Total job cost: **\$1,917**

BULLDOZER RIPPING WORK

Task description: Ripping

Site: Granger Pit Permit Action: New Permit Permit/Job#: M2025034

PROJECT IDENTIFICATION

Task #: 02A State: Colorado Abbreviation: None
Date: 8/1/2025 County: Rio Grande Filename: M034-02a
User: TJ1

Agency or organization name: DRMS

HOURLY EQUIPMENT COST

Basic Machine: Cat D8T - 8SU Horsepower: 310
Ripper Attachment: 1-Shank Ripper Shift Basis: 1 per day
Data Source: (CRG)

Cost Breakdown:

		Utilization %
Ownership Cost/Hour:	<u>\$179.60</u>	<u>NA</u>
Operating Cost/Hour:	<u>\$110.45</u>	<u>100</u>
Ripper Ownership Cost/Hour:	<u>\$14.77</u>	<u>NA</u>
Ripper Operating Cost/Hour:	<u>\$10.44</u>	<u>100</u>
Operator Cost/Hour:	<u>\$38.02</u>	<u>NA</u>
Total Unit Cost/Hour:	<u>\$353.28</u>	
Total Fleet Cost/Hour:	<u>\$353.28</u>	

MATERIAL QUANTITIES

Selected estimating method: Area

Alternate Methods:

Seismic: NA Bank Volume: NA BCY NA
Area: 2.00 acres Rip Depth (ft): 0.50 Volume: 1,613 BCY or CCY

Source of estimated quantity: Permit Application

HOURLY PRODUCTION

Seismic:

Seismic Velocity: NA feet/second

Area:

Average Ripping Depth: 3.71 feet/pass
Average Ripping Width: 5.56 feet/pass
Average Ripping Length: 50.00 feet/pass
Average Dozer Speed: 88.00 feet/minute
Average Maneuver Time: 0.25 minutes/pass
Production per unit area: 0.468 acres/hour

Job Condition Correction Factors

Unadjusted Hourly Unit Production: 0.468 Acres/hr
Site Altitude: 8,075 feet
Altitude Adj: 1.00 (CAT HB)
Job Efficiency: 0.83 (1 shift/day)
Net Correction: 0.83 multiplier

Adjusted Hourly Unit Production: 0.39 Acres/hr
Adjusted Hourly Fleet Production: 0.39 Acres/hr

JOB TIME AND COST

Fleet size: 1 Grader(s) Total job time: 5.15 Hours

Unit cost: \$909.458 Per acre Total job cost: \$1,819

BULLDOZER WORKTask description: Spread TopsoilSite: Granger Pit Permit Action: New Permit Permit/Job#: M2025034**PROJECT IDENTIFICATION**

Task #: 03A State: Colorado Abbreviation: None
 Date: 8/1/2025 County: Rio Grande Filename: M034-03a
 User: TJ1

Agency or organization name: DRMS**HOURLY EQUIPMENT COST**

Basic Machine: Cat D8T - 8SU
 Horsepower: 310
 Blade Type: Semi-Universal
 Attachment: NA
 Shift Basis: 1 per day
 Data Source: (CRG)

Cost Breakdown:

		<u>Utilization %</u>
Ownership Cost/Hour:	<u>\$179.60</u>	<u>NA</u>
Operating Cost/Hour:	<u>\$110.45</u>	<u>100</u>
Ripper own. Cost/Hour:	<u>\$0.00</u>	<u>NA</u>
Ripper op. Cost/Hour:	<u>\$0.00</u>	<u>0</u>
Operator Cost/Hour:	<u>\$38.02</u>	<u>NA</u>

Total unit Cost/Hour: \$328.07
 Total Fleet Cost/Hour: **\$328.07**

MATERIAL QUANTITIES

Initial Volume: 3,230
 Swell factor: 1.000
 Loose volume: **3,230** LCY

Source of estimated volume: Division of Reclamation, Mining & Safety
 Source of estimated swell factor: Cat Handbook

HOURLY PRODUCTION

Average push distance: 50 feet
 Unadjusted hourly production: 1,400.0 LCY/hr

Materials consistency description: Consolidated stockpile 1.0

Average push gradient: 0 %
 Average site altitude: 8,075 feet

Material weight: 1,600 lbs/LCYWeight description: Top Soil**Job Condition Correction Factor**

		<u>Source</u>
Operator Skill:	<u>0.750</u>	<u>(AVG.)</u>
Material consistency:	<u>1.000</u>	<u>(CAT HB)</u>
Dozing method:	<u>1.000</u>	<u>(GEN.)</u>
Visibility:	<u>1.000</u>	<u>(AVG.)</u>

Job efficiency:	0.830	(1 SHIFT/DAY)
Spoil pile:	0.800	(FND-RF)
Push gradient:	1.000	(CAT HB)
Altitude:	1.000	(CAT HB)
Material Weight:	1.438	(CAT HB)
Blade type:	1.000	(PAT)

Net correction: 0.7161

Adjusted unit production: 1,002.54 LCY/hr

Adjusted fleet production: **1002.54** LCY/hr

JOB TIME AND COST

Fleet size: 1 Dozer(s)

Unit cost: \$0.327/LCY

Total job time: **3.22** Hours

Total job cost: **\$1,057**

REVEGETATION WORKTask description: SeedingSite: Granger PitPermit Action: New PermitPermit/Job#: M2025034PROJECT IDENTIFICATIONTask #: 04AState: ColoradoAbbreviation: NoneDate: 8/4/2025County: Rio GrandeFilename: M034-04aUser: TJ1Agency or organization name: DRMSFERTILIZING**Materials**

Description	Units / Acre	Unit	Cost / Unit	Cost /Acre
			\$	\$
			Total Fertilizer Materials Cost/Acre	\$0.00

Application

Description	Cost /Acre
	\$
Total Fertilizer Application Cost/Acre	\$0.00

TILLING

Description	Cost /Acre
Disc harrowing, 6" deep (MEANS 32 91 13.23 6100)	\$114.13
Total Tilling Cost/Acre	\$114.13

SEEDING

Seed Mix	Rate – PLS LBS / Acre	Seeds per SQ. FT	Cost /Acre
Indian Ricegrass - Native	0.90	2.91	\$15.93
Crested Wheatgrass - Ephraim	1.50	6.89	\$8.43
Russian Wildrye - Bozoisky	0.50	2.01	\$5.67
Western Wheatgrass - Arriba	2.00	5.05	\$18.50
Totals Seed Mix	4.90	16.86	\$48.54

Application

Description	Cost /Acre
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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	0.50	TON	\$504.56	\$252.28
Total Mulch Materials Cost/Acre				\$252.28

Application

Description	Cost /Acre
Crimping, with tractor {DMG survey data}	\$239.35
Total Mulch Application Cost/Acre	\$239.35

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:	6	Cost /Acre:	\$896.60
Estimated Failure Rate:	25%	Cost /Acre*:	\$0.00
*Selected Replanting Work Items:	NONE		
Initial Job Cost:	\$5,379.60		
Reseeding Job Cost:	\$0.00		
Total Job Cost:	\$5,380		
Job Hours:	0.00		

EQUIPMENT MOBILIZATION/DEMOBILIZATIONTask description: **Primary Mobilization**Site: **Granger Pit**Permit Action: **New Permit**Permit/Job#: **M2025034****PROJECT IDENTIFICATION**Task #: **05A**State: **Colorado**Abbreviation: **None**Date: **8/4/2025**County: **Rio Grande**Filename: **M034-05a**User: **TJ1**Agency or organization name: **DRMS****EQUIPMENT TRANSPORT RIG COST**Shift basis: **1 per day**Cost Data Source: **CRG Data**Truck 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
Subtotals:					\$404.25	\$218.66	\$500.00

ROADABLE EQUIPMENT:

Machine Description	Total Cost/hr/ unit	Fleet Size	Haul Trip Cost/hr/ fleet	Return Trip Cost/hr/ fleet
Light Duty Pickup, 4x4, 3/4 T.	\$22.72	1	\$22.72	\$22.72
Subtotals:			\$22.72	\$22.72

EQUIPMENT HAUL DISTANCE and Time

Nearest Major City or Town within project area region: SOUTH FORK
 Total one-way travel distance: 7.00 miles
 Average Travel Speed: 45.00 mph

Total Non-Roadable Mob/Demob Cost * \$1,193.79
 ** two round trips with haul rig:
 Total Roadable Mob/Demob Cost ** \$7.07
 ** one round trip, no haul rig:

Transportation Cycle Time:

	Non-Roadable Equipment	Roadable Equipment
Haul Time (Hours):	0.16	0.16
Return Time (Hours):	0.16	0.16
Loading Time (Hours):	0.00	NA
Unloading Time (Hours):	0.00	NA
Subtotals:	0.31	0.31

JOB TIME AND COST

Total job time: 0.62 Hours

Total job cost: \$1,201

EQUIPMENT MOBILIZATION/DEMOBILIZATIONTask description: Secondary MobilizationSite: Granger PitPermit Action: New PermitPermit/Job#: M2025034**PROJECT IDENTIFICATION**Task #: 05BState: ColoradoAbbreviation: NoneDate: 8/4/2025County: Rio GrandeFilename: M034-05bUser: TJ1Agency 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
Drill/Broadcast Seeder with Tractor	25.00	\$5.99	\$75.46	1	\$81.45	\$75.46	\$250.00

Subtotals: **\$81.45** **\$75.46** **\$250.00****ROADABLE EQUIPMENT:**

Machine Description	Total Cost/hr/ unit	Fleet Size	Haul Trip Cost/hr/ fleet	Return Trip Cost/hr/ fleet
Light Duty Pickup, 4x4, 3/4 T.	\$22.72	1	\$22.72	\$22.72

Subtotals: **\$22.72** **\$22.72**

EQUIPMENT HAUL DISTANCE and Time

Nearest Major City or Town within project area region: SOUTH FORK
 Total one-way travel distance: 7.00 miles
 Average Travel Speed: 45.00 mph

Total Non-Roadable Mob/Demob Cost * \$548.82
 ** two round trips with haul rig:
 Total Roadable Mob/Demob Cost ** \$7.07
 ** one round trip, no haul rig:

Transportation Cycle Time:

	Non-Roadable Equipment	Roadable Equipment
Haul Time (Hours):	0.16	0.16
Return Time (Hours):	0.16	0.16
Loading Time (Hours):	0.00	NA
Unloading Time (Hours):	0.00	NA
Subtotals:	0.31	0.31

JOB TIME AND COST

Total job time: 0.62 Hours

Total job cost: \$556