COLORADO
Division of Reclamation, Mining and Safety
Department of Natural Resources
1313 Sherman Street, Room 215
Denver, CO 80203

REQUEST FOR TECHNICAL REVISION (TR) Importation of Inert Fill

File No.: M-1992-054 Site Name: Ignacio Pit (aka La Boca Pit)

County: La Plata TR# _____ (*DRMS Use only*)

Permittee: LBCR,LLC (La Boca Canyon Ranch, Todd Fisher, Manager)

Operator (If Other than Permittee): Contract: Crossfire Aggregate Services LLC

Permittee Representative: Nathan Barton (WASTELINE, Inc.) 970-564-1380 and Brian Abeln (Crossfire Aggregate Services LLC), 970-560-6757

The request for a TR is not considered "filed for review" until the appropriate fee is received by the Division (as listed below by permit type). Please submit the appropriate fee with your request to expedite the review process. After the TR is submitted with the appropriate fee, the Division will determine if it is approvable within 30 days. If the Division requires additional information to approve a TR, you will be notified of specific deficiencies that will need to be addressed. If at the end of the 30 day review period there are still outstanding deficiencies, the Division must deny the TR unless the permittee requests additional time, in writing, to provide the required information.

There is no pre-defined format for the submittal of a TR. Page 2 is designed to address the requirements of Rule 3.1.5(9). It is up to the permittee to provide sufficient information to the Division to approve the TR request, including updated mining and reclamation plan maps that accurately depict the changes proposed in the requested TR.

Required Fees for Technical Revision by Permit Type - Please mark the correct fee and submit it with your request for a Technical Revision.

Permit Type	**Required TR Fee**	**Submitted** (mark only one)
110c, 111, 112 construction materials, and 112 quarries	$216	☑
112 hard rock (not DMO)	$175	☐
110d, 112d(1, 2 or 3)	$1006	☐
2018-2019 Wildfire Material Debris Removal	Waived	☐

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Rule 1.1(24)/1.1(20) "Inert Material" means non-water-soluble and non-putrescible solids together with such minor amounts and types of other materials, unless such materials are acid or toxic producing, as will not significantly affect the inert nature of such solids. The term includes, but is not limited to, earth, sand, gravel, rock, concrete which has been in a hardened state for at least sixty days, masonry, asphalt paving fragments, and other inert solids.

**Rebar or other protruding reinforcements must be removed prior to placement. All material must be buried to a minimum of 3 feet below final surface grade.

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1. General Description of material to be imported: Dewatered drill cuttings and excavated/vacuumed clean soil and rock from projects, hydrovac material, and cured Portland cement concrete (See attachment)
2. Approximate volume of inert material to be backfilled: 100,000 CY (150,000 LCY)
3. Estimated dates of commencement: 01 September 2025 and completion: 31 August 2028
4. Use/purpose of imported material: Reclamation: provide additional rooting zone material and backfill in closed basin to bring to final grade and improve soil quality of on-site materials for reclamation. PCC debris will be used to backfill slopes and channels, buried at least 3 feet below final grade.
5. A general engineering plan stating how the material will be placed and stabilized in a manner to avoid unacceptable settling and voids. See attachment

☑ Enclosed is a map showing the proposed location of the inert material.

3.1.5(9)(c) - Affidavit

I Todd A. Fisher of LBCR,LLC (La Boca Canyon Ranch, Todd Fisher, Manager) hereby certify that only clean and inert material will be imported at Ignacio Pit (aka La Boca Pit). All material will adhere to the Division's definition of Inert Material as defined in Rule 1.1(24)/1.1(20).

Signature: _____ Date: 8/27/2025

Attachment 1 to Request for Technical Revision (TR) Importation of Inert Fill

The application and this attachment address the requirements of Construction Materials Rule 3.1.5.(9):

Item 1. (continued) Three types of material are proposed:

1. Drill cuttings: 1-inch-minus, mostly fines (less than #4). (1.1 T/LCY, 5-10% moisture, dewatered)
2. Hydrovac: soil excavated by high-pressure water. (0.9 T/CY, 50% moisture)
3. Portland cement concrete rubble previously dumped on the site by prior mine operators, or dumped with or without permission on the mine by known or unknown entities. (2 T/CY)

Material handling and placement described in Item 5.

Item 2. (explained) Estimated based on anticipated activities to be supported, over a three-year period, and uncompacted volume for haul, to fill designated location on floor of Area C.

Item 3. (explained) Based on anticipated schedule and taking into account seasonal operations and weather, activities, and availability of haulage.

Item 4. (explained) Quality of existing soil now stockpiled after stripping is fair. This imported material will improve moisture, moisture retention, and structure of the soil to be placed for reclamation, thereby improving the total soil profile for better post-reclamation use as cropland. Use of this material will aid in establishing and maintaining acceptable slopes, stability of the final grades, and will result in a post-mining configuration compatible with landowner's proposed use.

Item 5. General Engineering Plan (GEP) (Miners to be trained on the following tasks per MSHA.)

1. Inspect material at source. Remove unacceptable materials (litter, oversize material, etc.).
2. Load at source and haul to the pit by Crossfire trucks/drivers. Standard loads: cuttings 10 tons/10 CY per truckload. Hydrovac 5.5 tons/6 CY per truckload (max capacity 12 CY, varies by model.
3. Unload in Area A or C (as appropriate), inspect and remove any additional unacceptable materials and dispose of appropriately.
4. Place in stockpiles (windrows) to further dry as necessary.
5. Spread cuttings and hydrovac material with overburden (mixing as necessary), place in 6-inch lifts and compact.
    a. Inspect, grade, and compact to MPD of 70-90 % (ensuring good porosity for rooting zone material).
    b. Continue with additional 6-inch lifts to planned reclamation elevations.
6. Place concrete rubble after cutting protruding metal to flush with the concrete surface, break as needed and place in lifts. (Determine lift thickness based on size of material.
    a. Fill voids using hydrovac or screened overburden and compact.
    b. Place a minimum of 3 feet below the planned final grade.
    c. Recycle metal.
7. Cover with 6-inch on-site soil from stockpiles, prepare and seed for reclamation in accordance with Reclamation Plan.
8. Control weeds and dust during all portions of operation in accordance with existing plans.
9. Document all activities and include information in annual report to DRMS.

Notes: Excavation of Area C has ceased, and reclamation is ongoing, starting with the perimeter of the area, primarily to north, east, and south. Area C is a closed basin with no surface discharge, and

sloped to ultimately allow irrigation and a potential pond location (not part of reclamation plan). Outer slopes have been shaped and soil placed and seeded. Area to be filled is approximately 14 of 20 acres on floor, with good access off primary haul road with good traffic flow. Trucks bringing the imported material would likely otherwise have to deadhead to the pit to load construction materials for haul to project site.

Area A is a previously disturbed area with good access and has berms and terrain to allow tipping while preventing runon and runoff of water from high-moisture materials, and allowing concrete to be buried at least three feet deep.

Environmental impact: Beneficial use of this inert, clean, inspected and documented imported material will reduce environmental impacts of disposal as solid waste, storage in other locations, and transportation impacts (air emissions) and cost, while significantly improving the post-mining, reclaimed site on La Boca Canyon Ranch. This plan meets requirements of Rule 3.1.5.(10) to prevent any unauthorized release of pollutants to the surface drainage system and the conditions of the EPA General Permit for Discharge of Storm Water Associated with Industrial Activities for Indian Country.

The planned import and use comply with Rule 1.1(24)/1.1(20) “Inert Material" means non-water-soluble and non-putrescible solids together with such minor amounts and types of other materials, unless such materials are acid or toxic producing, as will not significantly affect the inert nature of such solids. The term includes, but is not limited to, earth, sand, gravel, rock, concrete which has been in a hardened state for at least sixty days, masonry, asphalt paving fragments, and other inert solids.

General Notes: This Technical Revision, when approved by DRMS, is part of the Reclamation Permit and therefore enforceable by the Operator in accordance with any lease or other contract for Crossfire Aggregate Services LLC or any other entity operating on the Ignacio Pit (M-1992-054).

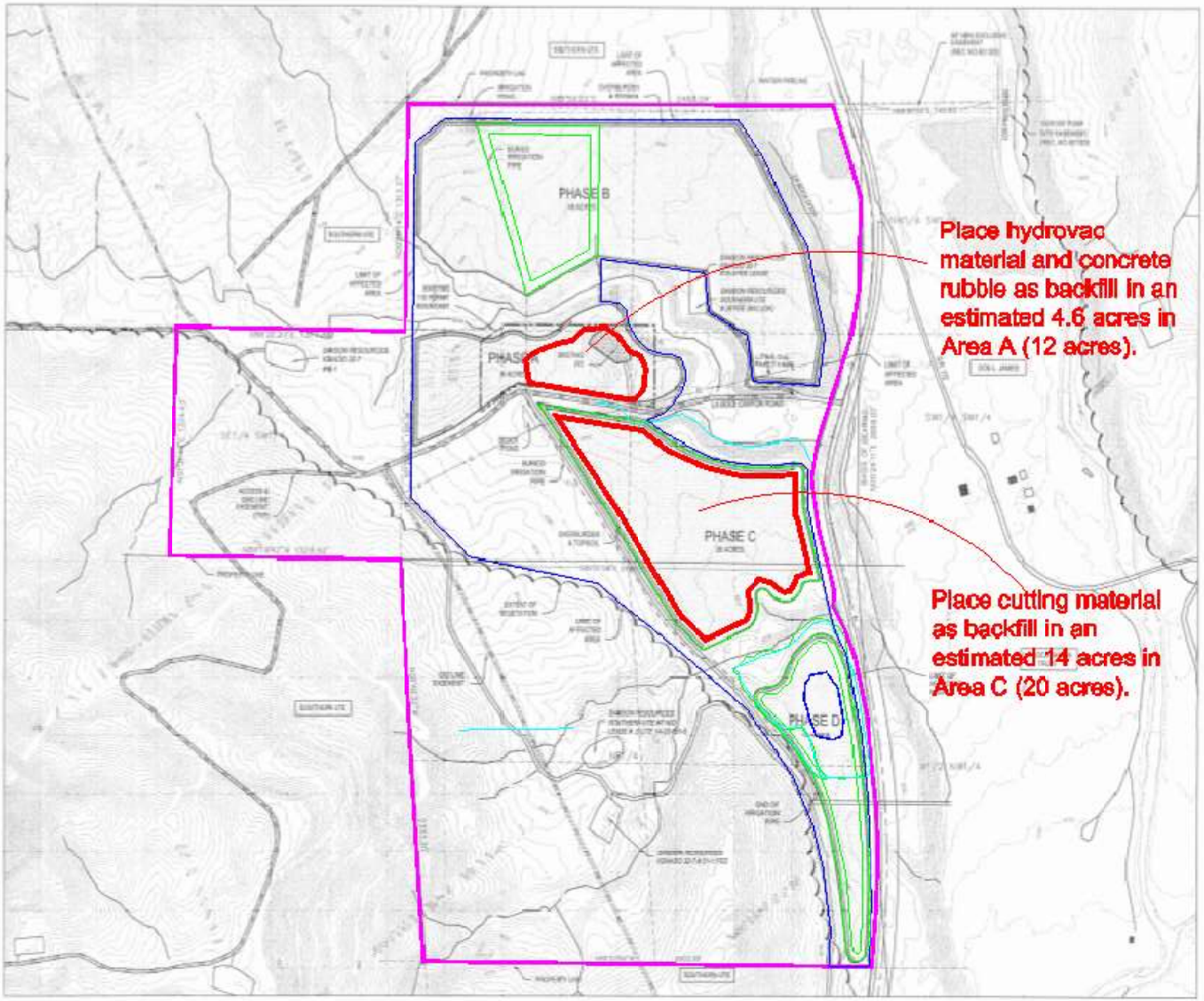
Prepared by Nathan A. Barton, CE,PE,DEE 25 August 2025

IGNACIO PIT at LA BOCA CANYON RANCH

Attachment to 2025-0822 Technical Revision

Showing location for placement of imported inert fill in Area C.

PERMIT #M-1992-054



NORTH

GRAPHIC SCALE

SCALE IN FEET

Prepared by WASTELINE, Inc.
(N. A. Barton) 22August 2025.
Using 2005-1006 SLS Map as base map.