



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: Pig Mesa Pit	MINE/PROSPECTING ID#: M-1978-168	MINERAL: Sand and gravel	COUNTY: Delta
INSPECTION TYPE: Monitoring	WEATHER: Clear	INSP. DATE: September 3, 2025	INSP. TIME: 08:30
OPERATOR: Delta County	OPERATOR REPRESENTATIVE: Tim McCracken	TYPE OF OPERATION: 112c - Construction Regular Operation	

REASON FOR INSPECTION: Normal I&E Program	BOND CALCULATION TYPE: None	BOND AMOUNT: \$0.00
DATE OF COMPLAINT: NA	POST INSP. CONTACTS: None	JOINT INSP. AGENCY: None
INSPECTOR(S): Robert Zuber, P.E.	INSPECTOR'S SIGNATURE: 	SIGNATURE DATE: September 19, 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: Gen. Compliance With Mine Plan

PROBLEM/POSSIBLE VIOLATION #1: The current mine plan needs to be updated and clarified pursuant to C.R.S. 34-32.5-112 (1)(c)(VI). The County must update the mining and reclamation plan maps to clarify the approved permit boundary and the affected area. Also, update any incorrect or outdated information in the permit exhibits.

CORRECTIVE ACTIONS: The County shall submit a Technical Revision, with the required \$216 revision fee, to update and clarify the currently approved permit exhibits to reflect existing and proposed activities by the corrective action date.

CORRECTIVE ACTION DUE DATE: 1/09/26

INSPECTION TOPIC: Gen. Compliance With Mine Plan

PROBLEM/POSSIBLE VIOLATION #2: Trash and refuse was noticed on the site. This is a problem at this time for failure to dispose of refuse in a manner that controls unsightliness or deleterious effects of such refuse pursuant to C.R.S. 34-32.5-116(4)(e).

CORRECTIVE ACTIONS: The 55-gallon drums and other materials that are stored on the site, and are not related to mining, need to be removed, and the County shall submit a written notice to the Division, with photo documentation, that the trash has been removed from the site by the corrective action date. Alternatively, a TR must be submitted to add a detailed discussion of these materials in the mining plan and mining plan map. The reclamation plan may also need to be revised to address the removal of these materials for reclamation and how the storage area will be reclaimed. This information could be submitted in the same TR required for other problems noted in this report.

CORRECTIVE ACTION DUE DATE: 1/09/26

INSPECTION TOPIC: Revegetation

PROBLEM/POSSIBLE VIOLATION #3: 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: Implement approved weed control plan and provide proof to the Division that this has been done. If a weed control plan is not already in place, 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: 12/05/25

INSPECTION TOPIC: Signs & Markers

PROBLEM/POSSIBLE VIOLATION #4: The mine identification sign was not posted at the entrance of the mine site. It is located at the gate to the west pit area. This is a problem for failure to post a mine identification sign as required by Section 3.1.12(1) of the rule. The County shall, at the entrance of the mine site, post a sign, which shall be clearly visible from the access road, with a minimum size equaling 187 square inches, such as 11 inches in height and 17 inches in width, with appropriate font size, with the following: the name of the Operator, a statement that a reclamation permit for the operation has been issued by the Colorado Mined Land Reclamation Board; and the permit number.

CORRECTIVE ACTIONS: The operator shall move the sign at the gate to the west pit area to the entrance of the mine site. It must be clearly visible from the access road. The County shall submit photo documentation that the sign has been posted at the proper location by the corrective action date.

CORRECTIVE ACTION DUE DATE: 12/19/25

INSPECTION TOPIC: Signs & Markers

PROBLEM/POSSIBLE VIOLATION #5: The permit area boundary markers are missing in some locations, including the west side of the site. This is a problem for failure to maintain boundary markers around the entire boundary as required by Section 3.1.12(2) of the rule. Fences suffice for markers if accurately placed at the permit boundary.

CORRECTIVE ACTIONS: The County shall conduct a survey and install boundary markers around the entire permit. The County shall provide proof to the Division that this has been done by the corrective action date.

CORRECTIVE ACTION DUE DATE: 12/19/25

OBSERVATIONS

The Pig Mesa Pit (M-1978-168) is a 112C permit for 165.25 acres. The number of acres currently affected is 31.3; this is stated in the 2024 Annual Report and appears to be accurate, per a Division assessment using aerial photography, maps, and on-the-ground observation. The site is located approximately three miles northeast of Delta, Colorado, off Fairview Road. The permit area is mostly owned by Delta County, the permittee. Some areas are owned by Benson Brothers (who own a gravel pit to the northeast, discussed below) and the Bureau of Land Management. The pre-mining land use and post-mining land use (PMLU) for the site are both wildlife habitat. Per the Annual Report, the site is an intermittent operation.

This inspection was routine monitoring. The last Division inspection was in January of 2020, and the frequency of inspections for this site is 48 months.

The inspection was performed the morning of September 3, 2025. In addition to the Division inspector, Tim McCracken, Delta County Engineer, was present. The County was not actively mining at the time of the inspection.

The weather during the inspection was warm and clear. The ground was dry.

The entrance sign was clearly visible at the entrance to the west pit. It was large enough and contained the necessary information, per Rule 3.1.12(1). However, this sign should be moved to the entrance for the entire site. The affected boundary was not well marked with posts or other markers (as required by Rule 3.1.12(2)) in some areas, including most of the west side of the site.

The site includes two mining areas: one near the southwest corner and one near the east end of the site. The depths of the pits are approximately 50 feet (southwest pit) and 30 feet (east pit). North of the east pit, there is a larger pit that is operated by Benson Brothers (Benson Brothers Pig Mesa Pit, M-2004-084). A portion of the Benson Brothers pit has extended into the permit area for the Pig Mesa Pit operated by the County. According to aerial imagery available in Google Earth, this encroachment started sometime between August 2019 and April 2023. This issue will need to be resolved with the other operator. However, if the affected lands are eventually included in another permit, Delta County would need to submit an Acreage Reduction request to remove them from the County's Pig Mesa Pit permit.

Other prominent features of the site include several product piles, a topsoil stockpile, and waste piles. No processing equipment was onsite, other than old pieces of equipment that appear to not be functional. An excerpt from the recent Annual Report map, with Division annotations; the current Reclamation Map for the permit; and two maps showing the locations of the piles (provided by Tim McCracken after the inspection) are included at the end of this inspection report. The types of material in the piles are as follows (numbers shown on maps):

1. Plant mix (5/16" minus)
2. 3" road base
3. 1 1/2" road base
4. 1 1/2" road base
5. 3/4" chips
6. 3" road base
7. 1/2" chips
8. 3" road base
9. Waste
10. Sand
11. Topsoil

The County needs to ensure that the topsoil is protected from erosion, including seeding it and using erosion control BMPs around the sides of the pile.

Many 55-gallon drums, bee boxes, and other materials (some appearing to be trash) were seen on the site, and they appear to be unrelated to mining. No stained soil was seen, and the drums appeared to be empty, but it is necessary that the County perform one of the following: remove the drums and other material from the site (and cease the practice of storing drums and other materials at this site) or include a discussion of the materials to be stored in the mining plan, via a Technical Revision (TR). If the County chooses the latter option, the following must be clearly identified in the mining plan and mining plan map: the storage areas, the types of materials that will be temporarily stored there, and how those areas will be reclaimed.

No ditches or ponds were seen. Berms generally prevent runoff to surrounding areas, but improvements are required in three locations: along the west side of the disturbed area, at the southwest corner of the western pit area, and on the south side of the west pit area (where there are Jersey barriers). A CDPS discharge point was seen at the south end of the eastern pit area. There is no indication that the site is causing offsite impacts to surface water hydrology, including Tongue Creek and the North Delta Canal (the receiving waters that are adjacent to the site). On the south side of the site, there is significant disturbance that could impact these waters, but it does not appear to be mining related; it is likely related to construction of the pipeline that carries the canal water around the south side of the site as well as the road adjacent to the pipeline.

There is no indication that the mining operation intercepts groundwater. The site appears to be well above the groundwater table.

Three State-listed noxious weed species were identified and should be controlled by the County. These include halogeton, knapweed, and tamarisk. There were signs that some of the knapweed had been sprayed.

A TR is required to update permit exhibits. All maps that show the permit boundary (including, but not limited to, the Mining Plan Map and the Reclamation Plan Map) need to be updated to show the boundary that is equal to the acreage of 165.25 acres. The County also needs to accurately show the affected area on the mining map (Exhibit C) per Rule 6.4.3(d) and report an accurate value in the mining plan. Also, primary areas of the site should be shown including product piles, the topsoil stockpile, berms, and the CDPS outfall. If the County determines that other aspects of the mining and reclamation plans (Exhibits C, D, E, and F); the Water Information section (Exhibit G); or other portions of the permit should be revised, those revisions can be performed in the same TR. For example, if a TR is submitted for the drums and other non-mining-related materials (see discussion above), that issue can be addressed with the more comprehensive TR.

Photographs taken during the inspection are attached.

Please contact Rob Zuber with comments or questions at 720-601-2276 or rob.zuber@state.co.us.

PHOTOGRAPHS



Sign at gate securing west pit area



West pit area, with small pile of 3/4" chips on left and plant mix soil on right
(taken from large sand pile, Pile #10 on map)



West side of affected area, with road on left, and irrigation structure for the North Delta Canal



West side of affected area where a berm is needed



55-gallon drums, bee boxes, and other material unrelated to mining operations



South end of site near west pit area – North Delta Canal is piped and adjacent to road (looking east)



South end of site near southeast corner – underground pipe is adjacent to road (looking west)



North Delta Canal on east side at transition from open channel to pipe



Looking east at Benson Brothers Pit, with County's permit on right



Berm and slope below the east pit area



Area west of east pit, with road base piles (#2 in foreground, #8 in background)



Topsoil pile (#11 on map), looking west

GENERAL INSPECTION TOPICS

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

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

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

Inspection Contact Address

Tim McCracken
Delta County
18830 G Road
Delta, CO 81416

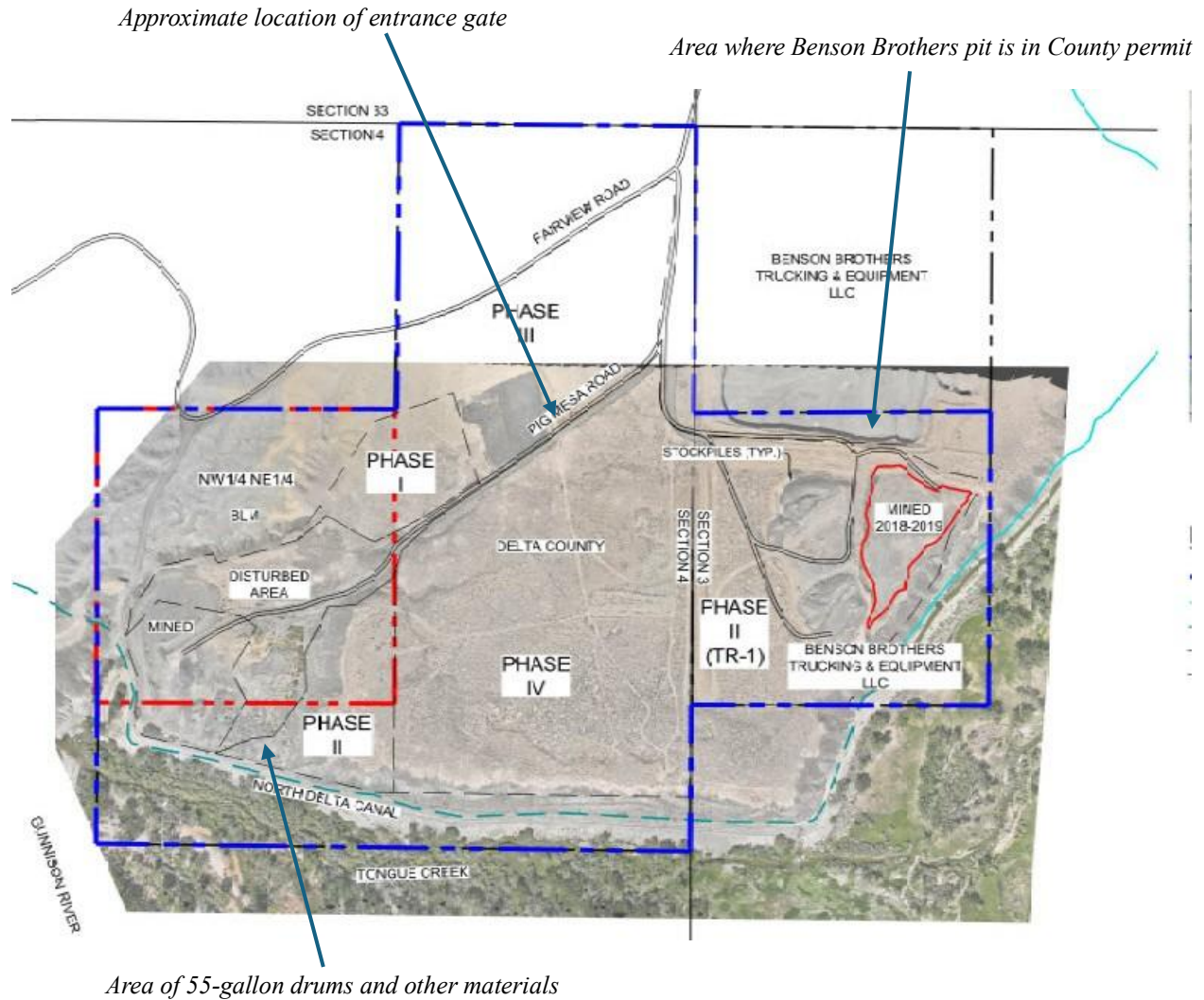
Enclosure

CC: Amy Eschberger, DRMS

Maps

2024 Annual Reclamation Map with Division Annotations

Note that the blue line indicates the Permit Boundary. It may not be accurate, because the area within this polygon is approximately 40 acres larger than the approved area of 165.25 acres for this permit. Also, it agrees with some permit maps but not with others.



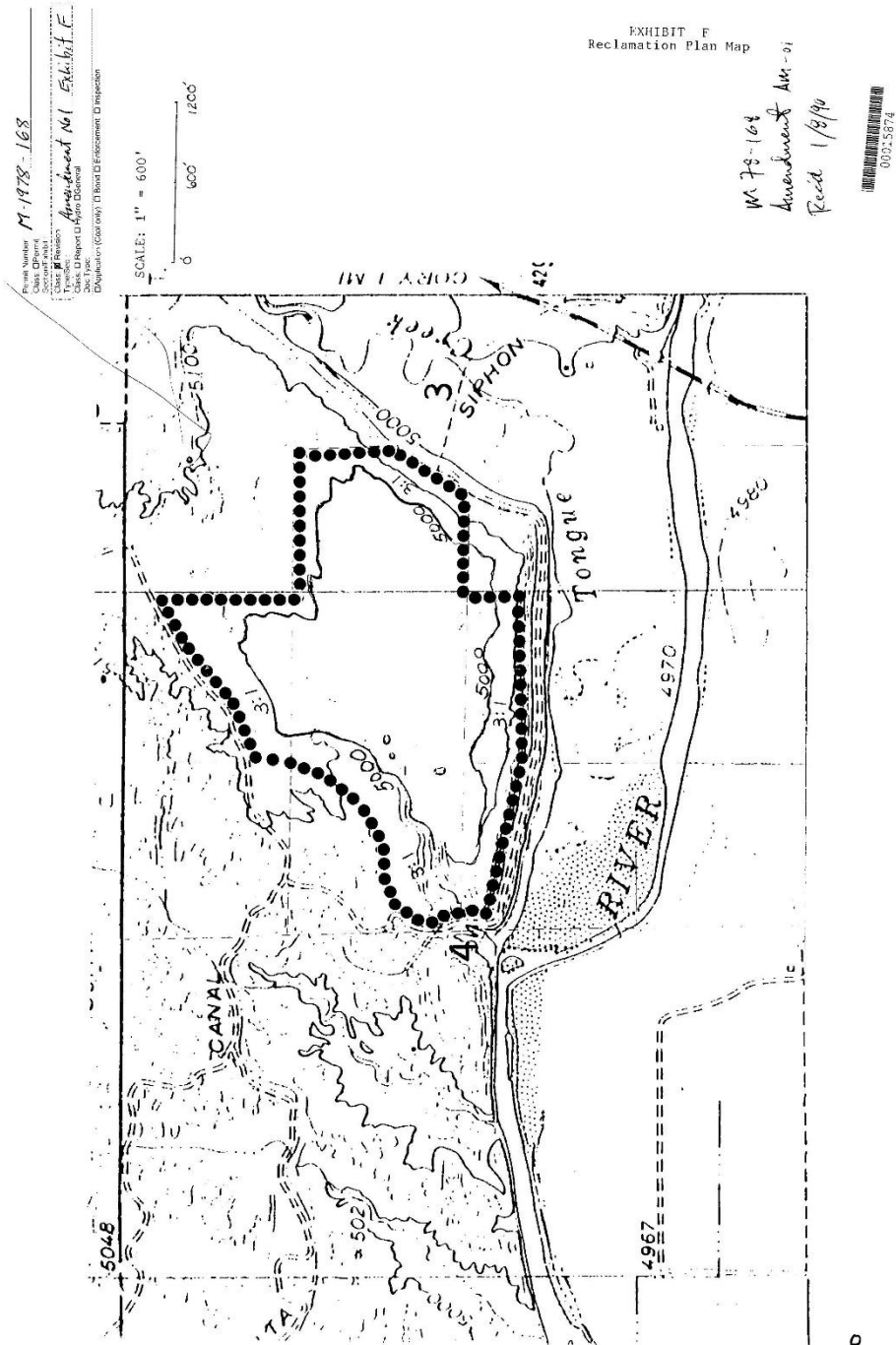
Scale:



1,320 feet

Currently Approved Reclamation Map from Amendment No. 1

Note that the dotted line indicates the Permit Boundary. The area within this polygon is approximately 165 acres, per a Division estimate.



Map from Delta County Drone Inventory of Piles, West Side of Pig Mesa Pit Permit



Map from Delta County Drone Inventory of Piles, East Side of Pig Mesa Pit Permit

