

October 7, 2025

Jason McGraw  
General Shale Brick, Inc.  
1845 W. Dartmouth Ave.  
Denver, CO 80110

**RE: Buffalo No 1, Permit No. M-1978-011, Status of Required Corrective Actions**

Mr. McGraw:

On September 15, 2025, the Division of Reclamation, Mining and Safety (Division) sent you a Status of Required Corrective Actions letter informing you of the outstanding corrective actions that needed to be addressed for Buffalo No 1, including the following:

- 1) Submit a signed affidavit from the new landowner of the disturbed portion of Phase IV, acknowledging the property is subject to a mining and reclamation permit; or if a signed letter cannot be obtained, submit proof that the letter was received by the landowner (via a return receipt of Certified Mailing). **Due Date: September 27, 2025**
- 2) Submit a 112c Amendment application, with the \$2,229.00 fee, to address mining and reclamation of Phase IV. This application must include, at a minimum, updated Exhibits C, D, E, F, L, N, O, Q, and R; but may also require updates to other exhibits. Both the inadequate financial warranty and Phase IV reclamation problems will be addressed through this revision. **Due Date: December 26, 2025**

Since that time, the operator has sufficiently addressed the required corrective actions for Item #1, and the Right of Entry problem was considered abated on September 25, 2025.

The Division met with the operator on October 1, 2025 to discuss the required corrective actions for Item #2. The operator expressed their desire to go back to the original requirement of submitting a Technical Revision with a reclamation plan for the disturbance in Phase IV (as initially requested in the Division's April 30, 2025 Problems Cited and Corrective Actions Required letter), rather than submitting an Amendment application with mining and reclamation plans and maps and other updated exhibits to address mining and reclamation activities in Phase IV. This is because the operation does not plan to mine Phase IV until mining has been completed in Phase III, which could be decades from now. The operator formally submitted this proposal via email on October 3, 2025.

After considering the operator's request, the Division has the following updated status of required corrective actions for Buffalo No 1:

- 1) Submit a Technical Revision, with the required \$216 fee, to include a reclamation plan and updated bond estimate for reclaiming the existing mining disturbance in Phase IV. **Due Date: December 26, 2025**

Please be advised, the operator will only be authorized to conduct reclamation activities in Phase IV in accordance with the reclamation plan that is approved through the forthcoming Technical Revision. The operator will not be authorized to conduct any mining activities in Phase IV until an Amendment application with full mining and reclamation plans and maps (and other required exhibits) for Phase IV has been issued.

If you have any questions, you may contact me by telephone at 303-945-9014 or by email at [amy.eschberger@state.co.us](mailto:amy.eschberger@state.co.us).

Sincerely,



Amy Eschberger  
Senior Environmental Protection Specialist

Cc: Houston Walker, General Shale Brick, Inc.  
David C. Garrett, Jr., General Shale Brick, Inc.  
Russ Means, DRMS  
Jeff Fugate, AGO