



STATE OF
COLORADO

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Baseline Resource M1997058- AR and SR Inspection Report

1 message

Girardi - DNR, Chris <chris.girardi@state.co.us>

Fri, Oct 10, 2025 at 9:24 AM

To: Damon Zuetell <dzuettel@hall-irwin.com>

Cc: Jared Ebert - DNR <jared.ebert@state.co.us>, Carl Eiberger <Black.Bear@comcast.net>

Good morning,

Attached to this email is a pdf of the Division's inspection report for the inspection conducted on August 21, 2025 at the Baseline Resource permit, file no. M-1997-058.

A hard copy will not be delivered unless requested. Please feel free to reach out if you have any questions.

Thanks,

Chris Girardi

Environmental Protection Specialist



COLORADO
Division of Reclamation,
Mining and Safety
Department of Natural Resources

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BaselineResource_AR3_SR6_InspectionReport_M1997058.pdf
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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: Baseline Resource	MINE/PROSPECTING ID#: M-1997-058	MINERAL: Sand and gravel	COUNTY: Weld
INSPECTION TYPE: Surety Release Inspection	WEATHER: Clear	INSP. DATE: August 21, 2025	INSP. TIME: 08:00am
OPERATOR: Hall-Irwin Aggregates, LLC	OPERATOR REPRESENTATIVE: Damon Zuetell	TYPE OF OPERATION: 112c - Construction Regular Operation	
REASON FOR INSPECTION: Surety Release Requested	BOND CALCULATION TYPE: Complete	BOND AMOUNT: \$75,380.00	
DATE OF COMPLAINT: NA	POST INSP. CONTACTS: None	JOINT INSP. AGENCY: None	
INSPECTOR(S): Chris Girardi	INSPECTOR'S SIGNATURE: 	SIGNATURE DATE: October 10, 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: Russian olive trees and Russian knapweed are present within or have volunteered into the permit area and are becoming established. This is a problem for failure to employ weed control methods for a 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 implement the existing weed control measures approved in Technical Revision #3 by use of an herbicide and mechanical measures in accordance with Section 3.1.10 (6) of the Rule.

CORRECTIVE ACTION DUE DATE: 11/14/25

OBSERVATIONS

The Baseline Resource permit was inspected on August 21, 2025, by Chris Girardi with the Division of Reclamation, Mining, and Safety ("DRMS" or "Division"). The inspection was completed in response to Acreage Reduction and Surety Reduction requests submitted by the Hall-Irwin Aggregates, LLC (Operator). Damon Zuetell represented the Operator during the inspection. Carl Eichberger, the landowner, was also present. The weather was clear and sunny.

The Baseline Resource permit is a 112c sand and gravel operation that consists of 209.6 acres and is located on the northern side of Brighton, CO. The approved post-mining land use is developed water resources. The current land use surrounding the site is a mixture of industrial, commercial, agricultural, and residential. The site was accessed from a gate along County Road 23 1/2. The mine identification sign was observed at the mine entrance in compliance with Rule 3.1.12. The Division inspected the areas in the northern portion of the permit area designated as Area A and the Walker North Lot C area as shown on the mining and reclamation plan maps. The permit contains lined reservoirs approved by the State Engineer's Office (SEO). The permit has been in final reclamation for several years, with all overburden and topsoil stockpiles having been removed or replaced, and all reservoir shorelines having been graded. In September 2021, the areas above the reservoir water line were seeded and mulched. The permit area was subsequently inspected in 2021 and 2023 by the Division.

On July 29, 2025, the Operator submitted an Acreage Reduction (AR-3) for partial release of the permit area in accordance with Rule 4.17.1. The Operator also submitted a Surety Reduction (SR-6) application for a reduction in the reclamation bond held by the Division in accordance with Rule 4.14.1. The Division conducted this inspection in accordance with Rule 4.17.2(2). The requested acreage reduction (release area) is 37.804 acres. This area consists of the entirety of Area A, which is 27.90 acres of a lake and surrounding shoreline areas, and 9.904 acres of land east of the Walker North Lot C reservoir. The Walker North Lot C reservoir was in stable condition, with the side slopes having been graded to a 3:1 horizontal to vertical configuration. The slopes were covered in vegetation, including some woody species, grasses, and annual weeds (see Photos 3-4).

The small area east of the Walker North Lot C area that has been requested for release is flat with thick, vegetative cover. The Operator stated the area was drill seeded in 2021 and 2023. Straw was also used as a soil amendment after seeding. However, the vegetation is dominated by a cover of annual weeds, namely Kochia, Cheatgrass, and Curled dock (see Photos 1-2). The reclamation seed mix consists of predominantly Western wheatgrass, Green needlegrass, Indian ricegrass, and a few Bluestem species. A few spots were barren and did not contain any annual weeds or reclamation grasses. If the reclamation seed mix species are growing under the cover of the annual weeds, it was not observable during this inspection. The Division noted that mowing would be beneficial in this area, and potentially an alternate seed mix.

The 27.90-acre area designated as Area A that also has been requested for release contains a lake with flat shorelines (see Photo 8-11). This area also contains a permanent access road on the southern side. PVP pipes marked the eastern permit boundary in this area. Much of the shoreline is dominated by Narrowleaf willow and other wetland species. 1.8 acres are reserved as a recreation area for RVs and boats (see Photo 9). The Division notes that the reseeding in this area is moderately established in some patches but still will require additional seeding before release for some areas (see Photos 5-8). Seeding conducted on adjacent to the

north and south of the access road yielded little to no establishment of the reclamation seed mix (see Photos 6-8). North of the recreation area, the lake shoreline exhibited good coverage of grasses (see Photos 11-12) and will not require additional seeding events.

A minor amount of Kochia and Curled dock was observed within Area A. A few Russian olive trees were observed along the northern lake shoreline, to which the landowner committed to removing (see Photo 11). Russian thistle and Russian knapweed were observed along the eastern shoreline as well (see Photo 10). This is cited as a problem at the beginning of this report. Russian knapweed and Russian olive are List B Noxious weeds and need to be eradicated immediately through the application of an herbicide as approved in Technical Revision #3 in 2021.

AR-3 and SR-6 Release Decision: After conducting this inspection, the Division determined the requested 37.804-acre release area has not been reclaimed according to the approved reclamation plan. AR-3 and SR-6 will be denied in accordance with Rule 4.17.2(4). The Division notes that consultation with Weld County and/or the CSU Extension Service may be warranted to determine if an alternative seed mix or soil amendment(s) would facilitate better revegetation success.

The Division currently holds a reclamation bond in the amount of \$75,380 for this operation. The Division has evaluated the reclamation liability for the site and determined that the current reclamation bond is adequate. This concludes the Division's inspection report. Photographs taken during the inspection are attached. If you need additional information or have any questions, please contact me at the Division of Reclamation, Mining and Safety, 1313 Sherman Street, Room 215, Denver, CO 80203, by telephone at (720) 793-3041, or by email at chris.girardi@state.co.us.

PHOTOGRAPHS



Photo 1: View of the 9.904-acre release request area dominated by weed cover, facing south.



Photo 2: Alternate view of the 9.904-acre release request area with significant amount of Kochia, facing southwest.



Photo 3: View of the Walker North Lot C lined reservoir, facing west.



Photo 4: Alternate view of the southern reservoir slope and vegetation within the Walker North Lot C area, facing northeast.



Photo 5: View of the southeastern corner of the Area A pond, facing north.



Photo 6: View of the unsuccessful seeded area south of the access road within Area A, facing south.



Photo 7: Mostly unsuccessful vegetation effort along the southern pond shoreline within Area A, facing west.



Photo 8: Mostly unsuccessful vegetation effort south of pond within Area A, facing north.



Photo 9: View of the recreation area and seeded area along the eastern pond shoreline of Area A, facing north.



Photo 10: View Russian knapweed and annual weeds along the pond shoreline within Area A, facing north.



Photo 11: View of vegetation, including grasses, annual weeds, woody vegetation, and Russian olives trees along the lake shoreline area, facing north.



Photo 12: View of well-established grasses along the northeast lake shoreline.

GENERAL INSPECTION TOPICS

This list identifies the environmental and permit parameters inspected and gives a categorical evaluation of each. No problems or possible violations were noted during the inspection. The mine operation was found to be in full compliance with Mineral Rules and Regulations of the Colorado Mined Land Reclamation Board for the Extraction of Construction Materials and/or for Hard Rock, Metal and Designated Mining Operations. Any person engaged in any mining operation shall notify the office of any failure or imminent failure, as soon as reasonably practicable after such person has knowledge of such condition or of any impoundment, embankment, or slope that poses a reasonable potential for danger to any persons or property or to the environment; or any environmental protection facility designed to contain or control chemicals or waste which are acid or toxic-forming, as identified in the permit.

(AR) RECORDS----- <u>N</u>	(FN) FINANCIAL WARRANTY----- <u>Y</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>Y</u>	(FW) FISH & WILDLIFE----- <u>Y</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>N</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

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CC: Jared Ebert, DRMS
Damon Zuetell, Hall-Irwin Aggregates, LLC
Carl Eichberger