

**BURNCO Colorado LLC**  
1120 W. 122<sup>nd</sup> Ave  
Suite 301  
Westminster, CO 80234

Phone: 970-356-7523  
[burnco.com](http://burnco.com)

October 21, 2025

Ursula Armstrong  
Colorado Division of Reclamation, Mining and Safety  
1313 Sherman Street, Room 215  
Denver, CO 80203

**RE: Technical Revision 2 – Bernhardt Gravel Mine (Permit M-2002-120) AR1 Response**

Dear Ms. Armstrong:

BURNCO Colorado requests a Technical Revision (TR) to Permit M-2002-120 to address the topsoil on-site.

**Exhibit E – Reclamation Plan (Rule 6.4.5):**

1) Please clarify the depth that topsoil will be spread and the volume that will be required to reclaim the entire site, including the stockpile area.

*BURNCO Response: Topsoil will be placed with a minimum depth of 6 inches. Topsoil needs to be placed on approximately 104 acres resulting in the need for 84,000 cubic yards of topsoil.*

2) Please clarify if any fertilizer will be used. If applicable, please provide the types, mixture, quantities, and the time of application for fertilization.

*BURNCO Response: The compost is 100% cow manure from the dairy farm. The manure will be mixed with the overburden at a mixture rate of 30% manure/70% overburden. Based on 84,000 cubic yards of topsoil, a total of 58,800 cubic yards of overburden and 25,200 cubic yards of manure will be needed. No additional fertilizer amendment will be needed. Topsoil will be placed during the Fall of 2025 and Spring of 2026 and then seeding will take place around April 2026 over a majority of the site. Any subsequent seeding will take place in the fall or spring as needed, e.g. the Pond 5 stockpile area will be seeded once the stockpile is removed which will take 1-2 years.*

We appreciate your review. Should you have any questions, please contact me.

Sincerely,



Joel Bolduc  
U.S. Land and Environment Manager