

JOHN W. SUTHERS Attorney General

CYNTHIA H. COFFMAN Chief Deputy Attorney General

DANIEL D. DOMENICO Solicitor General STATE OF COLORADO DEPARTMENT OF LAW

OFFICE OF THE ATTORNEY GENERAL

STATE SERVICES BUILDING 1525 Sherman Street - 7th Floor Denver, Colorado 80203 Phone (303) 866-4500

June 11, 2012

John J. Mitchel Attorney for Western Gravel, Inc. 300 North Cascade Ave., C-9 Montrose, CO, 81401

Re: Western Gravel, South D-20 Pit, M-1992-102, Forfeiture and Revocation

Mr. Mitchel:

I am writing in regard to Western Gravel's reclamation efforts at the South D-20 Pit. Western's work has reduced the required financial warranty from \$218,877.81 to \$37,900.00. The Division cannot process a reduction without a request from Western. You are encouraged to immediately submit such a request. The Division has set this matter for a forfeiture and revocation hearing on July 11, 2012. The Division is not inclined to consider any additional extensions of time. Western may avoid forfeiture and revocation by submitting an adequate financial warranty prior to the hearing. If Western does not timely submit a reduction request, it will be required to provide a financial warranty in the full amount of \$218,877.81.

Western's failure to maintain a financial warranty in good standing resulted in a November 2011 Board order finding the permit subject to forfeiture and revocation. *See* Board Order, Attachment A. The order also required Western to cease and desist any further activities at the site except "Division-approved reclamation activities or environmental maintenance." *Id.* The Division could have sought forfeiture and revocation as soon as January 2012.

Instead of immediately pursing forfeiture and revocation, the Division allowed Western to perform work intended to reduce its liability. The Division created a "task list" of approved reclamation activities, which Western agreed to complete, to the Division's satisfaction, by June 1, 2012. Division Specialist Russ Means inspected the site on June 4, 2012, and observed that Western had completed most of the work, but that some work failed to comply with applicable performance standards. *See* Inspection Report, Attachment B. Mr. Means determined that the Division would expend \$37,900.00 if it were to complete the remaining reclamation.

Western is encouraged to immediately submit a financial warranty reduction request consistent with Construction Materials Rule 4.14.1(2).¹ If Western fails to submit this request in a timely manner, the Division must pursue forfeiture of the entire face value of the previously-cancelled² surety. The Division must then hold the forfeited funds until all remaining reclamation work is complete; a process that could take several years. *See* C.R.S. § 34-32.5-118(5); Rule 4.20(9). Western's reduction request must include an "estimate of the actual cost to reclaim the site based on what it would cost an independent contractor to complete reclamation..." *See* Rule 4.14.1(2). Western is welcome to adopt and incorporate Mr. Means' calculation of \$37,900.00 by reference. If Western provides an appropriate replacement financial warranty prior to the July 11, 2012 hearing, the Division will withdraw the matter.

Very truly yours,

/s/ Steven Nagy

Colorado Assistant Attorney General Natural Resources & Environment Steven.Nagy@state.co.us 303-866-5049 303-866-3558 (fax)

cc (via email):	Douglas Colville		
	Russ Means		
	Victor Roushar		
	Judy Devincentis		

¹Available online at <u>http://mining.state.co.us/rulesregs/Revised-ConstrMatadoptedAug9%202006indexed.pdf</u>.

 $^{^2}$ The terms of the surety agreement provide that the issuer remains liable for the costs of reclaiming the site based on its condition on the day of cancellation, up to the full \$101,175.00 face value. The cost of reclamation on the date of cancellation was \$218,877.81.



DIVISION OF RECLAMATION, MINING AND SAFETY Department of Natural Resources

1313 Sherman St., Room 215 Denver, Colorado 80203 Phone: (303) 866-3567 FAX: (303) 832-8106

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Division of Reclamation, Mining and Safety

November 25, 2011

Judy DeVincentis Western Gravel, Inc. 3001 N. Townsend Avenue Montrose, CO 81401

Re: Finding of Fact, Conclusions of Law, and Order, Western Gravel Inc. File No. M-1992-102, MV-2011-038

On November 25, 2011, the Mined Land Reclamation Board signed the enclosed Board Order for the above captioned operation. We strongly advise that you read this document carefully since it may contain provisions which must be satisfied by specific dates to avoid future Board actions.

Sincerely,

Sitira Pope Secretary to the Board

Enclosure(s)

CERTIFIED MAIL NO. 7009 2820 0003 5701 1971

cc: Russ Means Steve Shuey John Roberts Jeff Fugate



John W. Hickenlooper Governor

Mike King Executive Director

Loretta E. Piñeda Director

BEFORE THE MINED LAND RECLAMATION BOARD STATE OF COLORADO

Notice of Violation No. MV-2011-038

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FINDINGS OF FACT, CONCLUSIONS OF LAW, AND ORDER

IN THE MATTER OF WESTERN GRAVEL, INC., POSSIBLE VIOLATION, CEASE AND DESIST ORDER, CORRECTIVE ACTIONS, AND CIVIL PENALTIES FOR FAILING TO MAINTAIN A FINANCIAL WARRANTY IN GOOD STANDING FOR THE LIFE OF A PERMIT AND TO COMPLY WITH THE PERFORMANCE WARRANTY, File M-1992-102

THIS MATTER came before the Mined Land Reclamation Board ("Board") on November 9, 2011 in Denver, Colorado for a hearing to consider the possible violation, cease and desist order, corrective actions, and civil penalties for Western Gravel, Inc.'s failure to maintain a financial warranty in good standing for the life of a permit and failure to comply with the performance warranty, file number M-1992-102. G. Russell Means appeared on behalf of the Division of Reclamation, Mining, and Safety ("Division"). Judy DeVincentis appeared on behalf of Western Gravel, Inc. ("Operator").

The Board, having considered the parties' presentations and having been otherwise fully informed of the facts, hereby enters the following findings of fact, conclusions of law and order.

FINDINGS OF FACT

1. The Operator has a 112c reclamation permit for a 61-acre sand and gravel site located in Section 17, Township 48 North, Range 9 West, 10th Principal Meridian, Montrose County, Colorado. The site is known as the South D-20 Pit.

2. On September 16, 2009, Washington International Insurance Company ("Washington International") issued a surety bond, number S4005090, in the amount of \$101,175.00 as financial warranty for the South D-20 Pit.

3. On July 19, 2010, the Division received notice of cancellation of bond number S4005090 from Washington International. The notice of cancellation stated the cancellation date as October 15, 2010.

4. On July 20, 2010, the Division sent a letter to Washington International noting the correct cancellation date as the bond anniversary date of September 16, 2011. 5. On July, 20, 2010, the Division sent a letter informing the Operator of the bond cancellation and that a replacement warranty needs to be submitted thirty (30) days prior to the effective date of the cancellation, by August 17, 2011.

6. On September 27, 2011, the Division inspected the South D-20 Pit. A representative for the Operator, Shauna Hovey, attended the inspection. The Division observed steep highwalls (greater than 3:1) along the southern pit edge, around the power pole exclusion area, and at the north end of the disturbance; númerous piles of processed materials on the pit floor; approximately 90,000 tons of stockpiled material.

7. On October 26, 2011, the Division updated the reclamation bond based on disturbances observed during the inspection, estimating that \$218,877.81 is required to reclaim the site.

8. On September 29, 2011, the Division sent a Reason to Believe a Violation Exists letter to the Operator, a copy of which was sent to Washington International. The letter notified the Operator and Washington International about the date and location of the November 9, 2011 hearing, at least thirty (30) days before the hearing, in accordance with section 34-32.5-118(2), C.R.S.

9. The financial warranty for the South D-20 Pit, permit number M-1992-102, expired on September 16, 2011. The Operator failed to post a replacement bond by September 16, 2011 or anytime thereafter.

CONCLUSIONS OF LAW

10. The Board has jurisdiction over this matter pursuant to the Colorado Land Reclamation Act for the Extraction of Construction Materials, Article 32.5 of Title 34, C.R.S. (2010) ("Act").

11. Under section 34-32.5-117(6)(a), C.R.S., a financial warranty must be maintained in good standing for the life of a permit. The financial warranty for permit number M-1992-102, surety bond number S4005090, expired and the Operator has failed to submit a suitable replacement to the Division.

12. Under section 34-32.5-118(1)(c), C.R.S., a financial warranty shall be subject to forfeiture whenever an operator has failed to maintain a financial warranty in good standing as required by section 34-32.5-117. The Operator has failed to maintain a financial warranty in good standing for permit number M-1992-102.

13. Pursuant to section 34-32.5-124(2), C.R.S., upon the Board's finding that an operator violated or failed to comply with the conditions of an order, permit, or regulation, the Board may issue a cease and desist order against the

Western Gravel, Inc. South D-20 Pit, M-1992-102 MV-2011-038 Operator. The Operator has failed to maintain the financial warranty for permit number M-1992-102.

14. Pursuant to section 34-32.5-124(7), C.R.S., upon the Board's finding that an operator violated or failed to comply with the conditions of an order, permit, or regulation, the Board may impose civil penalties against the Operator of not less than \$100 per day and not more than \$1,000 per day for each day during which a violation occurs. The Board may impose a civil penalty based on 51 days of violation (from the September 17, 2011 warranty expiration date to November 7, 2011) at \$100 to \$1,000 per day for a civil penalty of \$5,100 to \$51,000.

15. It is appropriate and within the Board's discretion to find a violation pursuant to the Act, issue a cease and desist order, and impose civil penalties against the Operator.

ORDER

The Board finds that the Operator is in violation of the Act, in accordance with section 34-32.5-117(6)(a), C.R.S., for failure to maintain a financial warranty in good standing for the life of a permit and failure to comply with the performance warranty.

The Board orders the Operator to CEASE AND DESIST any further activities at the South D-20 Pit except Division-approved reclamation activities or environmental maintenance.

In accordance with section 34-32.5-118(1)(c), C.R.S., the Board finds that the financial warranty for the South D-20 Pit is subject to forfeiture.

The Board finds that, in accordance with section 34-32.5-124(6)(a), C.R.S., permit number M-1992-102 is subject to revocation.

The Board imposes against the Operator a CIVIL PENALTY for 51 days of violation at \$100 per day for a total civil penalty of \$5,100.00. The civil penalty shall be due and payable within thirty (30) days of the effective date of this Order.

DONE AND ORDERED this 25 day of November 2011.

FOR THE COLORADO MINED LAND RECLAMATION BOARD

Barbara Green, Chair

Western Gravel, Inc. South D-20 Pit, M-1992-102 MV-2011-038

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NOTICE OF APPEAL RIGHTS

This order becomes effective and final upon mailing. Any party adversely affected or aggrieved by agency action may commence an action for judicial review by filing a notice of appeal with the district court within thirty (30) days after the effective date of this order, pursuant to section 24-4-106, C.R.S. (2010). In the event that an appeal is filed, designations of record made in accordance with section 24-4-106(6), C.R.S. should be served on the Board at: 1313 Sherman Street, Room 215, Denver, CO 80203, Attention: Sitira Pope.

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Western Gravel, Inc. South D-20 Pit, M-1992-102 MV-2011-038

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CERTIFICATE OF SERVICE

This is to certify that I have duly served the within FINDINGS OF FACT,

CONCLUSIONS OF LAW, AND ORDER upon all parties herein by depositing copies

of same in the United States mail, first-class postage prepaid, at Denver, Colorado,

this <u>RS</u> day of <u>November</u> 2011 addressed as follows:

Judy DeVincentis Western Gravel, Inc. 3001 N. Townsend Ave. Montrose, CO 81401

By inter-office mail to:

G. Russell Means Division of Reclamation, Mining and Safety Grand Junction Office 101 South 3rd, Suite 301 Grand Junction, CO 81501

Steve S. Shuey Division of Reclamation, Mining and Safety Grand Junction Office 101 South 3rd, Suite 301 Grand Junction, CO 81501

By intra-office mail to:

John J. Roberts Assistant Attorney General Office of the Attorney General 1525 Sherman Street, 7th Floor Denver, CO 80203

Jeff Fugate Assistant Attorney General Office of the Attorney General 1525 Sherman Street, 7th Floor Denver, CO 80203

Western Gravel, Inc. South D-20 Pit, M-1992-102 MV-2011-038



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:	MINE/PROSPECTING ID#:	MINERAL:	COUNTY:
South D-20 Pit	M-1992-102	Sand and gravel	Montrose
INSPECTION TYPE:	INSPECTOR(S):	INSP. DATE:	INSP. TIME:
Surety-Related Inspection	G. Russell Means	June 4, 2012	10:00
OPERATOR:	OPERATOR REPRESENTATIVE:	TYPE OF OPERA	TION:
Western Gravel, Inc.	None	112c - Construction	Regular Operation
REASON FOR INSPECTION:	BOND CALCULATION TYPE:	BOND AMOUNT:	
Priority	Complete Bond	\$101,175.00	
DATE OF COMPLAINT:	POST INSP. CONTACTS:	JOINT INSP. AGE	NCY:
NA	None	None	
WEATHER:	INSPECTOR'S SIGNATURE:	SIGNATURE DAT	E:
Clear	& Specel Means	June 4, 2012	

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>N</u>	(RD) ROADS <u>N</u>
(HB) HYDROLOGIC BALANCE <u>N</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>Y</u>
(MP) GENL MINE PLAN COMPLIANCE- <u>N</u>	(FW) FISH & WILDLIFE <u>N</u>	(RV) REVEGETATION <u>N</u>
(SM) SIGNS AND MARKERS <u>N</u>	(SP) STORM WATER MGT PLAN <u>N</u>	(SB) COMPLETE INSP <u>N</u>
(ES) OVERBURDEN/DEV. WASTE <u>N</u>	(SC) EROSION/SEDIMENTATION Y	(RS) RECL PLAN/COMP <u>N</u>
(AT) ACID OR TOXIC MATERIALS <u>N</u>	(OD) OFF-SITE DAMAGE <u>N</u>	(ST) STIPULATIONS <u>N</u>

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

OBSERVATIONS

This inspection was conducted as part of final enforcement action assessment by the Colorado Division of Reclamation, Mining, and Safety (Division) for failure to maintain a reclamation bond in good standing. The South D-20 Pit is a 112c permit, south of Montrose, Colorado. No Western Gravel's representative accompanied the inspector on site. This inspection is to note conditions of the site on June 4th, 2012 to estimate the final reclamation liability should a replacement bond be submitted or the current reclamation bond be forfeited during the July 2012 MLRB hearing.

Recap:

The Mined Land Reclamation Board signed an enforcement order on November 25, 2011 noting the permit was subject to revocation and the bond could be forfeited for failure to post a financial warranty replacement. A cease and desist order was issued for all activities except for Division approved reclamation and or environmental protection actions. Western Gravel sought and was granted permission to do reclamation per the approved plan to reduce the overall liability. The stipulation being that topsoil could not be handled if saturated by precipitation or frozen. All activities were to be completed and equipment moved off site by 5:00 pm January 31, 2012. Western Gravel complied with those stipulations and on January 31, 2012 the Division inspection noted all equipment was gone and earthwork, minus topsoiling was completed.

On February 1, 2012 the Division agreed to re-scheduling of a revocation and forfeiture board hearing to March so that Western Gravel could negotiate with Washington International, the Surety Company possible terms for finishing reclamation or posting of a new bond by February 27th, 2012. Both sides submitted an agreement on that date whereby Western Gravel agreed to complete reclamation. Per the acceptance of the agreement the Division granted Western Gravel until June 1, 2012 to complete all reclamation tasks and postponed the final MLRB revocation and forfeiture hearing to July 11, 2012. Noted by the Division should all reclamation be complete and a smaller bond posted the final revocation and forfeiture could be avoided.

Per the January 31st, 2012 photo documentation shows all highwalls were backfilled, and other material removed or utilized in the reclamation with the exception of one pile for the landowner which will be discussed below. The reclamation plan calls for 4:1 slopes which is less than the usual 3:1. All slopes are established at 3.5 to 5:1 which is within normal tolerances. Slopes were established in a natural looking way to match surrounding topography. Original plans called for the east side to daylight out at the mesa edge. However, disturbances never reached that point. The operator sloped the inside to 4:1 which creates a natural looking dish for the site as well as some stormwater control. This technique also prevented off site disturbance from materials being pushed or rolled down slope to unpermitted areas. The outlying undisturbed slopes are well vegetated with native grasses and shrubs with no visible signs of erosion or sedimentation issues.

The overburden and processed materials stockpiled were used to backfill highwalls and establish slopes. Topsoil was noted in 5 or 6 stockpiles scattered throughout the pit area. The topsoil has now been distributed across the site. Depths vary but are within the accepted range of the approved reclamation permit

The pit floor is relatively smooth. There is some volunteer vegetation along established collector ditches and low lying areas mostly grasses. Volunteer willows and a few cottonwood seedlings were observed along the western fence line as well.

As before, the inspector has noted that there is one stockpile of processed materials left on site at the southern edge of the pit floor. This material is the property of the landowner and will be left for their use upon final reclamation.

All operator equipment and materials have been removed as required. The inspector notes that pipe and other materials belonging to the landowner are staged at the far north end of the site just past the pit disturbance. An access road swings around the west side of the permit boundary to this area which is to remain.

Current Site Conditions, June 4, 2012:

The inspector notes again all earth work with the exception of several deep tire ruts in the northwest corner of the pit area that will be required to be filled in. The ruts may be repaired at a later date as they do not pose an imminent problem for erosion.

Pictures submitted by the operator on June 1st, 2012 are noted as being taken on May 19, 2012. For the record the Division received phone calls from Western Gravel's Shauna Hovey and Judy DeVincentis respectively on the last week of April and the second week of May regarding the requirements to reclaim by June 1st. It appears revegetation efforts took place sometime after the mid-May phone call with Ms. DeVincentis.

Most notable was the lack of mulch on site at that time of the June 19 pictures. It appears that mulch was distributed sometime in the last two weeks. The approved reclamation plan submitted by the operator clearly calls for mulch to be crimped in upon installation. It appears this task was not done. Photo documentation attached to this report clearly shows mulch is not evenly distributed in an acceptable manner. An estimated 5 acres has no mulch whatsoever while some 5 to 6 acres of pit floor have over 6 inches. Both conditions, thin and thick, are non-productive for reclamation. Therefore, an estimated 20% of mulching needs to be redone.

The inspector looked closely for seeding indications. In several areas where mulch appeared to be distributed correctly, while not crimped, seed heads were readily visible. It does not appear that any type of topsoil disc harrowing or fertilization occurred as required by the approved reclamation plan. In other areas, close inspection on hands and knees noted no observable seed application whatsoever.

The inspector observed knapweed on the east and west fringes of the permit. Bindweed was observed throughout the site including some mulched areas. Hoary Whitecrest was observed along the west edge as well. The monitoring and spraying of these weeds will be required until full release of the site.

Overall the earthwork is 100% complete. However, revegetation tasks stand at approximately 80% complete. The estimate of \$20,605.00 for final reclamation noted in February 2012 was based on 100% completion. Therefore the final estimate will be calculated to note the above tasks that need to be completed to gain 100% compliance as well as the secondary seeding tasks.

If you need additional information please contact me at the Division of Reclamation, Mining and Safety, Grand Junction Field Office, 101 S. 3rd St., Suite 301, Grand Junction, Colorado 81501, by telephone at 970.241.1117, or by e-mail at russ.means@state.co.us.

Inspection Contact Address

Judy DeVincentis Western Gravel, Inc. 3001 N. Townsend Ave. Montrose, CO 81401

Enclosure: Final Reclamation Liability Estimate as of June 4, 2012

CC: Washington International, Douglas Colville



COST SUMMARY WORK

	Task description:	Estimate for secondary see	ding			
Site:	South D-20 Pit	Permit Action:	Estimate for Enforcement		Permit/Job	#: <u>M1992102</u>
	PROJECT IDENTIFI	CATION				
	Task #: B01 Date: 6/4/2012 User: GRM Agency or organ	State: Colorado County: Montrose ization name: DRMS			Abbreviation: Filename:	
	TASK LIST (DIRECT	<u>COSTS)</u>				
Task	Description	nish + 25 secondary seeding	Form Used REVEGE	Fleet Size	Task Hours 40.00	Cost \$29,879.70
02b	mobilization to/ from s		MOBILIZE	1	2.50	\$834.95
			<u>SUBTO</u>	TALS:	42.5	\$30,714.65
	INDIRECT COSTS					
	OVERHEAD AND PROF	<u>PIT:</u>				
	Liability insurar Performance bo Job superintend Pro	ond: 1.05 ent: 0.00 ofit: 10.00	VTRACT AMOUT		Total = Total = Total = AL O & P =	\$620.44 \$322.50 \$0.00 \$3,071.47 \$4,014.41 \$34,729.06
	LEGAL - ENGINEERING	G - PROJECT MANAGEMEN	Т:			
	Engineering work a	rocessing (legal/related costs): nd/or contract/bid preparation: agement and/or administration:			Total = - $Total = -$	500.00 \$0.00 \$1,736.45
		CONTINGENCY:	3.00		Total =	\$921.44
			TOTAL	. INDIRE	CT COST = _	\$7,172.30

REVEGETATION WORK

South D-	20 Pit	Peri	nit Action:	Estimate for enforcement	Permit/Job#:	M1992102
PROJEC	<u>IDENTIF</u>	CATION				
Task #:	01B	State:	Colorado		Abbreviation:	None
Date:	2/1/2012	County:	Montrose		Filename:	M102-01b
User:	GRM					

FERTILIZING

Materials

Description	Units / Acre	Unit	Cost / Unit	Cost /Acre
Ammonium nitrate, 33-0-0	62.00	pound	\$0.35	\$21.76
Muriate of potash, 0-0-60	67.00	pound	\$0.32	\$21.44
Triple superphosphate, 0-46-0	88.00	pound	\$0.49	\$42.77
			Total Fertilizer Materials	
			Cost/Acre	\$85.97

Application

Description		Cost /Acre
Tractor towed spreader (MEANS 32 01 90.13 0120)		\$50.09
	Total Fertilizer Application Cost/Acre	\$50.09

TILLING

Description		Cost /Acre
Disc harrowing, 6" deep (MEANS 32 91 13.23 6100)		\$92.35
	Total Tilling Cost/Acre	\$92.35

SEEDING

Seed Mix	Rate – PLS LBS / Acre	Seeds per SQ. FT	Cost /Acre
Indian Ricegrass - Nespar	1.40	4.53	\$9.70
Crested Wheatgrass - Nordan	0.50	2.30	\$1.14
Russian Wildrye - Vinal	1.00	4.02	\$3.63
Galleta	1.10	4.02	\$27.14
Streambank Wheatgrass - Sodar	1.10	3.59	\$4.53
Thickspike Wheatgrass - Critana	1.70	6.01	\$8.60
Western Wheatgrass - Arriba	1.60	4.04	\$5.76
Rabbitbrush, Rubber	0.25	3.72	\$8.96
Sagebrush, Mountain or Big	0.05	2.64	\$1.65

Saltbush, Shadscale		1.30	1.94	\$15.17
Winter Fat		0.80	2.04	\$25.60
	Totals Seed Mix	10.80	38.84	\$111.88

Application

Description		Cost /Acre
Drill seeding {DMG}		\$90.11
	Total Seed Application Cost/Acre	\$90.11

MULCHING and MISCELLANEOUS

Ma	teri	als

Description	Units / Acre	Unit	Cost / Unit	Cost /Acre
Hay, delivered {MEANS 31 25 14.16 1200}	2.00	TON	\$164.00	\$328.00
Herbicide - Curtail @ 8.0 pt/ac	1.00	ACRE	\$31.80	\$31.80
Total Mulch Materials Cost/Acre				\$359.80

Application

Description		Cost /Acre
Crimping, with tractor {DMG survey data}		\$65.89
Power mulcher (MEANS 32 91 13.16 0250)		\$79.71
Weed spray, truck, non-aquatic area, nox. [DMG]		\$60.19
	Total Mulch Application Cost/Acre	\$205.79

NURSERY STOCK PLANTING

Common Name	No / Acre	Type and Size	Planting Cost	Fertilizer Pellet Cost	Cost /Acre
					\$
Totals Nursery Stock Cost / Acre				\$0.00	

JOB TIME AND COST

No. of Acres: Estimated Failure Rate:		30	Cost /Acre:	\$995.99	
		0%	Cost /Acre*:	\$995.99	
*Selected Replanti	ng Work Items:	FERTILIZING, TILLING	,SEEDING,		
		MULCHING			
Initial Job Cost:	\$29,879.70				
Reseeding Job Cost: \$0.00					
Total Job Cost:	\$29,879.70				

Job Hours: 40.00