



# Geotechnical Consultants, Inc.

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October 25, 1989

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MINED LAND  
RECLAMATION DIVISION

Mr. Dan Hernandez  
Mined and Reclamation Division  
1313 Sherman Street, Suite 215  
Denver, CO 80203-2273

Re: Snyder Quarry Corrective Action Plan

Dear Mr. Hernandez:

The following presents our comments on behalf of Mansfield Development regarding the Corrective Action Plan for the rock spillage from the Phase I area of the Snyder Quarry. As you requested, we are presenting our concerns in writing, so that the Division will have an opportunity to review the concerns and address them in their Corrective Action Plan review. Our concerns involve the rehabilitation of the slope and concerns over mining operation procedures in Phase I and future areas.

## Slope Rehabilitation:

The slope rehabilitation required in the Snyder drainage area, results from Phase I activities. The rehabilitation proposed by Castle Concrete is significantly less than slope restoration which we request should be implemented in the violation areas. Although we realize that complete slope restoration may not be possible because of steep slope conditions and other factors, there are some methods, apparently available, that can be used in the "rehabilitation program" to aid in the revegetation process. This would include increasing the number and size of trees in the damaged slope area, the use of polyacrylamides in the tree planting process, and requirement of a longer establishment period for at least three full growing seasons.

## Preventative Action:

As part of the Corrective Action Plan, Castle Concrete also proposes some preventative action to "reduce the probability of such an event occurring again". These are enumerated on Pages 7 and 8 of their Corrective Action Plan. In recent correspondence with Castle Concrete, they indicate that the new fence style that is under study by the Highway Department has "considerable potential, but we are not sure exactly how it could be used in a quarry operation". Since it appears that Castle Concrete has no proven method of preventing such spillage or slides from happening in the future, we would request that the Division consider as

a condition of approval of future work in Phase I and work in future Phases, that prior to starting in new areas, they implement a proven method to prevent such slides.

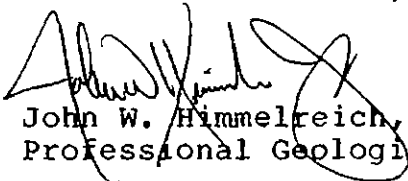
Related to rock spillage is the potential setback to be maintained from the working areas. In the Phase III Amendment area, a setback of about 2 feet is proposed between the Permit Boundary and the mining limits. This leaves no buffer and virtually no margin for error should an accident occur. Although Castle Concrete has indicated both by letter and conversations to Mansfield Development that they would accept a 20 to 25 foot setback from the Permit Boundary, ideally the mining boundary should be based on detailed analysis of slope, drainage, and rock conditions in the mining area. Also again, prior to working in a steep area, a proven method of preventing spillage should be implemented by the operator. This should be incorporated into the conditions of approval for the permit.

In regards to future planning in the Phase III area and related preventative measures, the following comments are offered. As you are aware, the Corrective Action Plan for the Snyder Quarry Access Road includes a desiltation pond in the western portion of the road area. This is not proposed as part of the corrective action of the violation, but rather as desiltation resulting from erosion in the Phase I and Phase II areas. Mansfield Development is concerned that the conceptual nature of mining plans, especially in the Phase III area, will result in Permit Boundary increases, as a result of inadequacies of approved plans. We would request that the Division consider more detailed plans in such a sensitive and topographically complex area, so that all potential mining-related problems and drainage conditions can be planned for prior to starting in the Amendment area.

Please feel free to contact the undersigned should you have any questions or require clarification.

Respectfully submitted,

GEOTECHNICAL CONSULTANTS, INC.

  
By: John W. Himmelreich, Jr.  
Professional Geologist

JWH/heh  
GCI Job No. 3539

cc: Mr. Scott Briggs  
Mr. George Rosenberg