

SITE MITIGATION PLAN

Mesa Man Camp

**Mesa BNB, LLC
Mesa Man Camp
12793 County Road 51B
Hayden, Colorado 81639**

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1. DESCRIPTION OF SITE ACTIVITIES

Mesa Man Camp was initiated to meet the demand of the increased workforce needed for Peabody and the lack of sustainable housing available in the area. Peabody has partnered with Mesa BNB, LLC to facilitate a Man Camp operation that will house no more than 50 Twentymile Mine personal. Mesa Man Camp will be comprised of modular self-contained housing units. The site will be for employees and contract miners employed at the Twentymile Mine. This is temporary housing to help recruit employees and give employees an opportunity to find permanent housing.

The land is owned by Sage Creek Holdings, LLC (Peabody) and will be operated by Mesa BNB, LLC. The site will include housing and gravel parking lots. The site will use best management practices for stormwater control, weed management, and any other impacts that may need mitigation.

2. STORMWATER QUALITY CONTROLS

Mesa Man Camp is adjacent to the Mesa Gravel Pit that is also owned and operated by Peabody. Existing ditches and sediment control features will help facilitate the management of any encountered stormwater. The site will be build on a gravel pad designed to drain to the south a an existing vegetated ditch will relay the runoff to an existing sediment pond. This will minimize the impacts of stormwater influence to and surround water quality.

During construction, sediment control features such as straw wattles and silt fence will be utilized to minimize erosion. These features will be left in place and maintained until the area is stable they are no longer needed.

Mesa BNB personal will perform periodic inspections of the site drainage and to insure that the offsite impacts are kept to a minimum.

2.1. TOPSOIL PRESERVATION

Prior to construction the topsoil will be stripped from the effected area and placed in a stockpile and preserved for use during reclamation. The topsoil pile will be seeded and shaped to minimize erosion and preserve the quality.

2.2. PREVENTIVE MAINTENANCE AND GOOD HOUSEKEEPING

Preventive maintenance and good housekeeping is performed on an as-needed basis on the drainage control features. Inspections of the surface facilities are performed periodically with attention given to the drainage control features.

In the event that equipment is being stored onsite (for site maintenance) , the equipment will be inspected for fluid leaks and addressed if any are found. This will prevent and ground contamination and minimize potential of spills.

2.3. SPILL PREVENTION RESPONSE PROCEDURES

In the event of a significant, uncontrolled petroleum or chemical product spill at the facilities, the following procedure will be followed:

- A) The individual noticing the spill immediately notifies a Mesa BNB, LLC representative of the spill location, type of material spilled, and approximate quantity of spilled material. If the spill is minor and the person noticing the spill can safely contain or control it, this should be done prior to notification.
- C) Mesa BNB, LLC will determine the adequacy of the immediate response and initiate additional measures as required.

In the event of a spill occurrence, the following persons are to be notified:

Bud Bower (Primary Spill Coordinator)
970-326-8562

Miranda Kawcak (Secondary)
970-439-8273

2.4. BEST MANAGEMENT PRACTICES

Several BMPs are used onsite. Diversions are provided around active operations which route runoff around the disturbed area. Sediment and erosion prevention practices which may be employed in disturbed areas include: gentle slopes, gravel surfacing, establishment of vegetation on disturbed areas, catch basins, rock filters, vegetative filters, straw bales, and silt fences.

2.5. EMPLOYEE & RESIDENT EDUCATION

Documentation covering the drainage control and spill prevention and response procedures are posted at the site for the employees and residents to review. These documents include: drainage control, best management practices, cleanup measures for spills, review of past spills and causes, spill reporting procedures, handling of contaminated materials, and general employee motivation concerning the need for spill prevention and the need for good housekeeping.

3. NOXIOUS WEED MANAGEMENT

Noxious weed infestations may occur on disturbed areas. To minimize potential adverse resource impacts that may result from noxious weed infestations; optimize revegetation success; and fulfill sound land management objectives, Mesa BNB, LLC (MBL) will incorporate the following integrated noxious weed management program (weed program).

MBL's weed program was developed with reference to the Colorado Weed Management Act (CRS 35-5.5-115), and in consultation with the local office of the Colorado State University Cooperative Extension Service (CSU-Extension Service, also the Routt County Weed Control agency). MBL's weed program focuses on those noxious weed species listed by the Colorado Department of Agriculture, and will be modified, as appropriate to address any changes to this list. MBL's integrated weed program consists of five interrelated components, as detailed in the following sections: Prevention, Identification and Mapping, Management Planning and Scheduling, Application of Selected Control Method(s), and Evaluation of Control Effectiveness.

3.1. Prevention

Prevention is the most important component of MBL's weed program and includes the following items.

- Re-seed disturbed areas that will not remain disturbed after the construction phase.
- Develop and use seed mixtures which replicate native plant communities and encourage rapid vegetative reestablishment
- Plant only certified weed-free seed for the approved seed mixes
- Assess the need for any supplemental management measures. (ie: fertilization, reseeding, weed control, protection from wildlife, etc.) to assure effective vegetative reestablishment
- Minimize noxious weed propagation by treating any noxious weed infestations prior to seed-head maturation using mechanical, chemical, or biological controls, or a combination of these methods
- Monitor and evaluate weed control efforts on an annual basis as described in the following sections

3.2. Identification and Mapping

MBL will utilize a range of resources to identify and map any noxious weed infestations within the Man Camp area, primarily supplied by the contracted weed spray contractors. The contractors will be trained in noxious weed identification and certified for chemical application.

3.3. Management Planning and Scheduling

Effective management and planning are key elements in assuring the effectiveness of MBL's noxious weed control program. Any new information collected through the ongoing noxious weed identification and mapping efforts, along with treatment information from prior years is reviewed and evaluated. Based on this information, treatment strategies and schedules are developed during the early spring for the annual weed management program using the following steps:

- 3.3.1. For mapped weed infestations, treatment methods are determined based on the weed species present using recommendations provided by the CSU Extension Service. Selection of treatment method(s) takes into consideration proximity to flowing water or water bodies, croplands, any livestock use, and historical response of identified weed species to prior treatment(s), based on review of control effectiveness. Treatment methods may include mechanical controls (tillage, mowing, burning, cutting/pulling), chemical controls (selective herbicides), biological controls (weed-specific insects or pathogens), or combinations of these methods. In general, treatment method(s) will be selected to achieve the most effective control with the resources available. As an example, where multiple weed species are present, the most effective overall control(s) will be applied, although the method(s) may not be optimal for each individual species.
- 3.3.2. Scheduling of weed management treatments will also be based on the CSU Extension Service recommendations for specific weed species. For most species, control effectiveness can be significantly enhanced by scheduling treatment at specific stages of vegetative growth (typically spring and/or fall). To the extent possible, based on staff and contractor availability, treatment will be scheduled to optimize effectiveness.

3.3.3. Priority and responsibilities for weed control are determined based on weed species present and the location and extent of weed infestations. Certain weed species are extremely aggressive, and first priority will be given to their control to prevent establishment and spread. Previously treated areas are second in priority, in order to maximize control effectiveness. Third in priority are any new weed infestations and areas where the weed infestation covers a large area, to prevent further spread. Lowest priority is given to isolated weed infestations of non-aggressive species which have not been previously treated, since these may be addressed by natural vegetative succession and pose a reduced risk of spread.

3.4. Application of Selected Control Method(s)

The proposed treatment methods for noxious weed species known to occur within the Mesa Man Camp area will be based on recommendations provided by the CSU Extension Service. Species targeted will be based on the most up to date weed lists provided by Routt County and the Colorado State Noxious Weed A and B lists.

3.5. Evaluation of Control Effectiveness

Generally, in conjunction with the spring site maintenance inspections, areas of previously identified and treated noxious weed infestations are inspected and the effectiveness of control measures is evaluated based on reduction or elimination of weed infestations. This information is utilized in the management planning process to determine the need for continued treatment and to modify treatment method(s), if indicated, to improve their effectiveness.