



COLORADO

Division of Reclamation,
Mining and Safety

Department of Natural Resources
1313 Sherman Street, Room 215
Denver, Colorado 80203

June 1, 2017

Edwin Olivares
GCC Rio Grande, Inc.
3372 Lime Road
Pueblo, CO 81004

**Re: Technical Revision (TR-06) Follow-up Adequacy Review;
Pueblo Cement Plant and Limestone Quarry, File No. M-2002-004**

Dear Mr. Olivares,

The Division of Reclamation, Mining and Safety (Division) has reviewed the May 10, 2017 response to the Division's April 14, 2017 adequacy review of Technical Revision (TR-06) for the Pueblo Cement Plant and Limestone Quarry, File No. M-2002-004, and submits the following comments. **The decision date for TR-06 is July 3, 2017.** Please be advised TR-06 may be deemed inadequate and denied on July 3, 2017, unless the following adequacy issues are addressed to the Division's satisfaction.

1. - 2. *Adequate as submitted.*

3. - 4. The adequacy responses to items 3 and 4 provided a map with a scale of 1 inch = 1200 feet and GCC requested a waiver of the scale requirements of Rule 6.2.1(2). The Division is not authorized to grant exemptions to the Rules and therefore a map with a scale not larger than 1 inch = 50 feet nor smaller than 1 inch = 660 feet is required. Upon further review of the map, the legend appears to misidentify the permit boundary and the property boundary. Additionally, this map was cut off along the right side.

5. - 8. *Adequate as submitted.*

9. Adequate as submitted, however, if saturation is observed during the installation of MW-006, the Division will revisit the concept of requiring an additional well down-dip of the first mining panel (Years 1-5), approximately near the location of the abandoned monitoring well MW-001A.

10. - 11. *Adequate as submitted.*

Additional Adequacy Item:

12. As the Division and GCC believe the proposed location for MW-006 is appropriately located down-dip of the second mine panel (Years 6-15), the operation will potentially need additional wells down-dip of the other four mine panels (Years 16-25, Years 26-35, Years 36-45, and Years 46-50) to demonstrate compliance with the requirements of Rules 3.1.5(5), (10) and (11); 3.1.6,

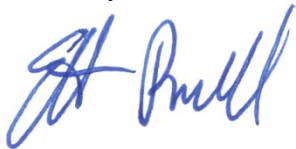


and 3.1.7. Please commit to contacting the Division and updating the groundwater monitoring plan as the quarry operation advances into future mine panels.

This concludes the Division's follow-up adequacy review of TR-06. This letter shall not be interpreted to mean there are no other technical deficiencies in your request. Other issues may arise as additional information is supplied. Please be advised, TR-06 may be deemed inadequate, and the request may be denied on **July 3, 2017**, unless the above mentioned adequacy review items are addressed to the satisfaction of the Division. If more time is needed to reply, the Division can grant an extension to the decision date. It will be your responsibility to request an extension of time to allow for continued review of this Technical Revision.

If you need additional information or have any questions, please contact me at Division of Reclamation, Mining and Safety, 1313 Sherman Street, Room 215, Denver, CO 80203, by telephone at **303-866-3567 x8132**, or by email at elliott.russell@state.co.us.

Sincerely,



Elliott R. Russell
Environmental Protection Specialist

Cc: Wally Erickson, Division of Reclamation, Mining & Safety