



COLORADO
Division of Reclamation,
Mining and Safety
Department of Natural Resources

1313 Sherman Street, Room 215
Denver, CO 80203

June 14, 2018

Gregory Dangler
RMR Aggregates, Inc.
4601 DTC Blvd. Suite 120
Denver, CO 80237

RE: Mid-Continent LST, File No. M-1982-121 , Technical Revision (TR-5) Adequacy Review

Dear Mr. Dangler:

On June 11, 2018 the Division of Reclamation, Mining and Safety (Division) received your Technical Request (TR-5). The request has been deemed complete and the Division is now in the process of reviewing the above referenced Technical Revision in order to ensure that it adequately satisfies the requirements of the Colorado Land Reclamation Act (Act) and the associated Mineral Rules and Regulations for the Extraction of Construction Materials (Rules). During review of the material submitted, the Division determined that the following issue(s) of concern need to be adequately addressed before the Technical Revision can be considered for approval. Please provide the following:

Water, Cuttings Management, and Erosion Control:

1. Will any sort of flocculants or other additives be used to help facilitate sediment drop out for water being recirculated? If so please provide the Division with additional information on that chemical and address if any additional special treatments with regards to water disposal will be necessary.
2. It was stated that once drilling is done water will be transferred to holding tanks on site for future use. Please state the end use of that water.

Open Drill Holes:

3. The Rules require timely abandonment of drill holes upon completion. Given that the drilling program should only last 10-days please include a commitment to keeping holes open for no more than 10-days after completion. An exception will be made for a maximum of three holes to conduct geotechnical analysis for a period of 90-days.



4. Please state that if a wet hole is encountered it must be immediately plugged or sealed in a manner which prevents communication of ground water between layers. This is consistent with the Rules and Regulation for Water Well Construction, Pump Installation, and Monitoring and Observation Hole/Well Construction ("Water Well Construction Rules"), 2 CCR 402-2, and specifically Rules 10.1 and 10.4.5 of the Water Well Construction Rules, and their applicable subsection therein.

Plugging and Reclamation:

5. Please make a commitment to submit final abandonment reports within 30-days of plugging the hole(s).
6. Basic information in the abandonment report should include: date of abandonment, depth of non-metallic plug placement, intervals of various plug material types and placement depths.
7. If a wet hole, please include the interval at which the bentonite plug is being placed and the approximate volume of bentonite used. Note, several bentonite plugs may be necessary in one hole to prevent inter-mixture of aquifers or ground water if multiple layers are encountered.

Post Drilling As-Built Drawings:

8. Basic information in the Construction report should include: date of completion, hole diameter, total depth drilled, GPS surface location, indicate the hole was drilled nearly vertical or has a horizontal kick off, and what drilling location they are associated with.
9. In the completion report make an indication if water was encountered and if so at what interval(s). If artesian, the estimated rate of flow (if known).
10. Indicate if this hole will be used for geotechnical analysis and therefore left open for up to 90-days.
11. Please make a commitment to submit as-built reports within 30-days of abandonment of the hole(s).

Please submit your response(s) to the above listed issue(s) **by Friday, June 29, 2018** in order to allow the Division sufficient time for review. If you cannot address the above issues by June 29, 2018 please request an extension to the decision due date to ensure adequate time for the Division to review materials. A decision due date of July 12, 2018 has been set.

The Division will continue to review your Technical Revision and will contact you if additional information is needed. The Division will be updating the reclamation cost estimate which may result in a surety increase. Please note that since this site is on BLM the Division will also be seeking concurrence from the BLM.

Furthermore the Division would like to advise you that if you do encounter a wet hole this would be a good opportunity to collect data and characterize the water ground quality and quantity within

the current permit boundary. Such data will be required if/when an amendment to expand the quarry is submitted. Additional permitting may be required to convert exploration hole(s) into a groundwater monitoring well(s). Additional monitoring wells outside of the permit boundary will require an NOI prior to commencement.

Lastly this TR will cover only up to 15 holes to be drilled in 2018. If additional holes are necessary a new TR will be required to address a later drilling operation.

If you require additional information, or have questions or concerns, please feel free to contact me. Amy Yeldell at the Division of Reclamation, Mining and Safety, 1313 Sherman St., Room 215, Denver, CO 80203. Direct contact can be made by phone at 970-254-8511 or via email at amy.yeldell@state.co.us

Sincerely,



Amy Yeldell

Environmental Protection Specialist

Ec:

Wally Erickson, Senior EPS, Grand Junction DRMS
Jessica Lopez Pearce, BLM-Colorado River Valley Field Office
Bobby Wagner, RMR, VP Colorado Operations