



COLORADO

Division of Reclamation,
Mining and Safety

Department of Natural Resources

1313 Sherman Street, Room 215
Denver, Colorado 80203

August 31, 2018

Derrick Dease
Holcim (US) Inc.
3500 Highway 120
Florence, CO 81226

Re: Boettcher Limestone Quarry, Permit No. M-1977-348
Receipt of 30-Day Extension Request for Corrective Action Deadlines

Mr. Dease:

On August 31, 2018, the Division of Reclamation, Mining and Safety (Division) received your request to extend the corrective action deadline for the following two problems identified in the inspection report sent to the operator on June 7, 2018:

1) PROBLEM:

The Division has no evidence that the operator has a valid well permit, substitute water supply plan, or approved water augmentation plan for the exposed groundwater at the site. This is a problem related to C.R.S. 34-32.5-116(4)(h) and Rule 3.1.6(1)(a) governing injury to existing water rights.

CORRECTIVE ACTIONS:

The operator shall demonstrate that the operation is in compliance with the Office of the State Engineer (SEO), show evidence that the operator is taking measures to bring the site into compliance with the SEO, or backfill the pits to at least two feet above the groundwater surface by the corrective action due date.

2) PROBLEM:

The current groundwater monitoring plan for the site does not include monitoring for the parameters of Table Value Standards established by Water Quality Control Commission's (WQCC's) Regulation No. 41 - The Basic Standards for Ground Water. This is a problem at this time pursuant to Rule 3.1.6(1)(b), which requires operators to maintain compliance with applicable federal and Colorado water quality laws and regulations, including statewide water quality standards and site-specific classifications and standards adopted by the WQCC.

CORRECTIVE ACTIONS:

The operator shall submit a Technical Revision, with the required \$216 revision fee, to update the approved groundwater monitoring plan to include monitoring for parameters from the Table Value Standards established by WQCC's Regulation No. 41 - The Basic Standards for Ground Water, and comparing parameter values to the most restrictive Table Value Standards rather than to any calculated values that may have been approved previously.



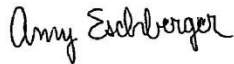
The Division has approved a 30-day extension of the corrective action deadline for Problem #1 regarding the exposed groundwater on site, from September 5, 2018 to **October 5, 2018.**

However, the Division cannot approve an extension of the corrective action deadline for Problem #2 regarding the groundwater monitoring plan. The operator indicates a need to meet with CDPHE, WQCD prior to complying with this corrective action. However, this corrective action is independent from such discussions. The operator must demonstrate compliance with Rules 3.1.5(11), 3.1.6(1), and 3.1.7 that protect groundwater from disturbances caused by the mining or reclamation operations. Additionally, Rule 3.1.7(8) requires an operator to demonstrate, to the satisfaction of the Division, that reclamation has been achieved so that existing and reasonably potential future uses of groundwater are protected. Therefore, until the operator has provided such demonstration, the Division will not be able to approve a full release of the site. This demonstration must begin with a more comprehensive sampling program, as required by the corrective action.

The corrective action deadline for Problem #2 is **September 5, 2018.**

If you have any questions, you may contact me by telephone at 303-866-3567, ext. 8129, or by email at amy.eschberger@state.co.us.

Sincerely,



Amy Eschberger
Environmental Protection Specialist

EC: Sara Harkins, Golder Associates, Inc. at: sara_harkins@golder.com
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