

STATE OF  
COLORADO

Ebert - DNR, Jared &lt;jared.ebert@state.co.us&gt;

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**Lamb Lakes, M-2018-039, Adequacy Review No. 2**

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**William Schenderlein** <bill@blueearthsolutions.net>  
To: "Ebert - DNR, Jared" <jared.ebert@state.co.us>

Wed, Oct 17, 2018 at 4:45 PM

Jared – I've attached our response to your adequacy review comments dated October 16, 2018. Please let me know if you have questions or need additional information.

I am working my way through responses to the objection letters. I'll get those to asap. Please let me know if they need to be put on file with the Larimer County Clerk and Recorder before delivering to you.

*Bill Schenderlein*

*Blue Earth Solutions, LLC*

(970) 227-2803

**From:** Ebert - DNR, Jared <jared.ebert@state.co.us>  
**Sent:** Tuesday, October 16, 2018 2:22 PM  
**To:** William Schenderlein <bill@blueearthsolutions.net>  
**Cc:** Richard Rains <rraines@scwtp.org>; Eric Reckentine <ericr@nwcwd.org>; Michael Cunningham - DNR <michaela.cunningham@state.co.us>  
**Subject:** Lamb Lakes, M-2018-039, Adequacy Review No. 2

Good afternoon Bill,

I have completed by review of your response to the first adequacy review. There are several items that will need to be addressed. Please see the attached adequacy review letter. We are on a tight deadline on this and I would appreciate a response to the attached adequacy review letter no later than **Thursday morning October 18th** as I need to prepare my recommendation to the MLRB to be sent Tuesday October 23, 2018 which must first be reviewed and approved by our legal staff.

Please be aware the applicant must participate in the Pre-hearing conference scheduled for October 26, 2018 and be prepared to discuss the objections and issues to be considered by the MLRB. DRMS will defend our decision but it is incumbent on the applicant to defend their application.

I will give you a call later to discuss the adequacy review.

Thank you,

Jared

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Jared Ebert

Environmental Protection Specialist III

[Redacted]

P 303.866.3567 ext. 8120 | F 303.832.8106 |

1313 Sherman St., Room 215, Denver, CO 80203

[jared.ebert@state.co.us](mailto:jared.ebert@state.co.us) | [mining.state.co.us](http://mining.state.co.us)



**Lamb Lakes Adequacy Response 2018.10.17.pdf**  
234K



October 17, 2018

Colorado Department of Natural Resources  
Division of Reclamation, Mining and Safety  
Attn: Mr. Jared Ebert  
1313 Sherman Street; Room 215  
Denver CO, 80203

**RE: Response to Adequacy Review Comments for North Weld County Water District,  
Lamb Lakes, File No. M-2018-039**

Dear Mr. Ebert:

The following discussion and attachments are submitted on behalf of our client, North Weld County Water District, in response to the Adequacy Review comments prepared by the Division of Reclamation, Mining and Safety (the Division) dated October 16, 2018 for the Lamb Lakes site Regular (112) Operation Reclamation Permit application. The information and discussion below address each comment as it was presented by the Division.

Rule 6.4.7 – Exhibit G – Water Information

5. Prior to new mining and reclamation activities on the Lamb Lakes Site, the applicant commits to providing the Division with a Technical Revision that includes the site Groundwater Monitoring Plan. The Groundwater Monitoring Plan shall include an agreement with the Fort Collins Irrigation Canal Ditch owner addressing potential irrigation flow impacts OR procedures to detect, measure, and mitigate losses to ditch flows during mining and reclamation activities. The applicant understands that the Technical Revision will need to be approved by the Division prior to commencement of new mining and reclamation activities.
7. The Groundwater Monitoring Plan shall also include recommendations from the Hydrogeologic Evaluation (Blue Earth Solutions, LLC, October 2018) and at a minimum:
  - a. A map that accurately shows the location of all monitoring wells/piezometers in the plan,
  - b. Well/piezometer construction and completion information that demonstrates measurements from the well/piezometer are representative of actual groundwater conditions,
  - c. Sampling procedures and frequencies – routine quarterly measurements shall be required and monthly measurements shall be required during lake/pit dewatering,

- d. Reporting requirements – at a minimum, groundwater monitoring results shall be provided to the Division with the Lamb Lakes site annual report,
- e. Potential groundwater impact mitigation measures and groundwater elevation “trigger” levels for each well/piezometer that will require notifying the Division and possible mitigation implementation,
- f. Baseline groundwater elevations that include at least 18 months of monitoring prior to any new site mining or reclamation activities,
- g. Private wells west of the Cache la Poudre River and within 650 feet of the proposed permit boundary. If permission can be retained from the private well owner, the private well shall be included in the monitoring plan with the same monitoring frequency as the on-site wells/piezometers. Routine quarterly measurements shall be required at the private wells and monthly measurements shall be required during pit dewatering. The private wells will be accurately located on the monitoring plan map and, if available, well construction information shall be obtained, evaluated and included in the monitoring plan. Every attempt shall be made to collect 18 months of baseline elevation measurements prior to new mining and reclamation activities.

Rule 6.4.19 – Exhibit S – Permanent Man-made Structures

- 13. Prior to new mining activities and construction of the slurry wall on the Lamb Lakes Site, the applicant commits to providing the Division with a Technical Revision that includes stability analyses for existing and proposed slopes during pit bottom mining, existing slope reconstruction, and slurry wall construction. The applicant understands that the Technical Revision will need to be approved by the Division prior to commencement of the listed mining and reclamation activities.

Proof of filing this adequacy review response with the Larimer County Clerk is attached.

If you have any questions regarding this application and adequacy comment responses, please call me directly at (970) 227-2803.

Sincerely,  
**Blue Earth Solutions, LLC**



William Schenderlein, P.E.  
Project Manager



## Letter of Transmittal

DATE: October 17, 2018

TO: Larimer County Clerk and Recorder  
200 W. Oak Street  
Fort Collins, Colorado 80521

*nt*  
*10/17/18*

FROM: Bill Schenderlein  
Blue Earth Solutions, LLC  
P.O. Box 2427  
Fort Collins, Colorado 80522  
(970) 227-2803

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### WE TRANSMIT:

- ☒ Attached  
☐ Information Below

### THE FOLLOWING:

- ☐ Originals  
☒ Copy of Letter  
☐ Applications  
☐ Specifications  
☐ Other

### FOR YOUR:

- ☒ Use  
☐ Approval  
☐ Information  
☐ Review & Comment

### Remarks:

Submission of this material satisfies requirements of the Mine Land Reclamation Board Regular 112 Operation Reclamation Permit Application. The enclosed application material must remain for public review at least sixty (60) days after a decision on said application has been made the Office of Mined Land Reclamation (Rule 1.6.2 (2)). Confidential materials were purposely excluded.

- One (1) copy of Adequacy Review Response Letter for DRMS application adequacy review comment letter dated October 16, 2018 – Lamb Lakes, M-2018-039 – North Weld County Water District

Signed: \_\_\_\_\_

*Bill Schenderlein*