



COLORADO

Division of Reclamation,
Mining and Safety

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

April 5, 2019

Clinton Beck, P.E.
Pete Lien & Sons, Inc.
P.O. Box 440
Rapid City, SD 57709

RE: Adequacy Review; Technical Revision (TR-02); St. Barbara Sand and Gravel Mine; Permit No. M-2004-013

Dear Mr. Beck,

On March 22, 2019, the Division of Reclamation, Mining and Safety (Division) received a request for Technical Revision (TR-02) for the construction of slurry wall to reduce groundwater consumption at the St. Barbara Sand and Gravel Mine, Permit No. M-2004-013. Please be advised that on April 21, 2019, the application for TR-02 may be deemed inadequate and denied unless the following adequacy item is addressed to the Division's satisfaction. Subsequent to receipt and review of the Operator's response to these items. Please respond to the adequacy items with a letter summarizing each response, to the numbered items below, in a cover letter titled "Adequacy Review Response TR-02, M-2004-013".

1. Please specify the size of the area that is proposed to be isolated by the slurry wall construction? In addition, provide a revised Mining Plan Map with a label specifying the acreage.
2. Please provide an approximate timetable to describe the mining operation as required by Rule 6.4.4(e). The timetable is for the purpose of establishing the relationship between the mining and reclamation during different phases of the mining operation. Such timetable should include:
 - a. An estimate of the time periods of time which will be required for the various stages or phases of the operation;
 - b. A description of the size and location of each area to be worked during each phase;
 - c. Outlining the sequence in which each stage or phase of the operation will be carried out;
 - d. The Operator indicated that this area would be used for overburden storage after the cell was backfilled, approximately how much area will be dedicated to storage?, and
 - e. Once this stage has been reclaimed when will reseeding occur?
3. Please provide a description of the methods of mining to be employed in the stage of the operation as required by Rule 6.4.4(a).
4. Please describe how the initial dewatering of the cell will be performed?
5. What is the approximate depth to groundwater at the site?
6. If the ponds are relocated will they be the same size as the existing ponds?



7. What are the dimensions of the existing ponds at the site; length, width and depth?
8. In the event that there is a flood that inundates the cell during active mining, being located within the 100-year floodplain, how will you ensure that captured water is returned to the natural drainage system within 72 hours?
9. After mining and backfilling is completed is there a risk of the cell being saturated through flooding and creating a localized area of saturation that cannot be drained and thus affecting the hydrologic balance at the site? Has the Operator considered breaching the slurry wall after the cell is mined out in order to maintain the prevailing hydrologic balance at the site?
10. At this time the Division is not requiring submittal of the slurry wall construction specifications but in the event that the proposed cell southern wall gets incorporated into the adjacent final water resources pond the Division will require those specifications as well as QA/QC documentation associated with its construction.
11. As a part of the review of TR-02, the Division will evaluate the financial warranty to determine the cost of reclamation for this phase of the mining operation. Reclamation of the phase will be accomplished by backfilling the cell to approximate original grade. All information necessary to calculate the costs of reclamation must be submitted and broken down into the various phases of reclamation as required by Rule 6.4.12. Please include with the provided information the approximate volume and location (indicate on revised Mining Plan Map) of overburden and topsoil currently stockpiled at the site.

This concludes the Division's adequacy review of TR-02. As a reminder, TR-02 may be deemed inadequate, and the request may be denied on April 21, 2019, unless the above mentioned adequacy review items are addressed to the satisfaction of the Division. If more time is needed to complete the reply, the Division can grant a 30-day extension to the decision date. This will be done upon receipt of a written waiver of the Operator's right to a decision by April 21, 2019. The request must be received no later than the deadline date. Please note, a request for additional time will waive the automatic approval clause within Rule 1.9.1 and the new decision date will no longer have the same clause. The Division reserves the right to further supplement this document with additional adequacy issues and details as necessary.

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 x8114**, or by email at patrick.lennberg@state.co.us.

Sincerely,



Patrick Lennberg
Environmental Protection Specialist

Cc: Michael Cunningham; Division of Reclamation, Mining & Safety