

Colorado Division of Reclamation, Mining and Safety
Attention: Mr. Eric Scott
1313 Sherman Street
Room 215
Denver CO 80203

Re: Burnco Amendment for the Shores Gravel Mine Application M1998013 Public Comment from Pelican Shores South HOA.

Mr. Eric Scott,

Pursuant to our telephone call on 5/12/20. Pelican Shore South HOA would like to publicly comment on the application for amendment for the Shores Gravel Mine Application M1998013 for Burnco.

Pelican Shore South HOA is an adjoiner to the east of the proposed property that is to be mined. Pelican Shores South HOA is a quasi-governmental agency that consist of 26 homeowners with 5 board members overseeing our community's affairs consistent with Weld County Government. Our HOA owns and operates a 55-acre private lake on 110 acres of open space property in which we use for recreation and a wildlife preserve.

Pelican Shores South HOA, through the Board of Directors would like to voice concern and offer our public comment on these proposed new cells that are adjacent to our lake.

It is Pelican Shores South HOA through the Board of Directors belief that during historic mining of Pond E, from roughly 2014 to 2019, that the dewatering method utilized by Burnco did in fact adversely affect lake levels during that period of time. Since construction, our lake has historically remained full and never varied more than about 6" from full pool. During the period aforementioned of dewatering in Pond E, Pelican Shores South lake levels dropped 18" from full pool.

Similarly, Pelican Shore South HOA and its board are concerned that the sustained dewatering in Cell 1 during mining as shown on the drawings from Civil Resources dated 2/4/20 will interrupt natural groundwater patterns and adversely affect water levels in our lake and groundwater flow toward our lake. Additionally, the proposed dewatering in Cells 2A and 3, again shown on drawings from Civil Resources dated 2/4/20, although shorter may also adversely affect water levels in our lake and groundwater flow toward our lake. Long term groundwater levels and patterns may also be adversely affected by the construction of impervious lined ponds

Pelican Shore South HOA does not necessary object to the proposed mine plan and the long-term intent to use Cells 2A and 3 as water storage, however it is concerned with the effects on historic groundwater flows and patterns and the resulting negative impacts on lake levels at Pelican Shores South Lake.

We ask Colorado Division of Reclamation, Mining and Safety to require as a condition of the permit and approval of this mine amendment that (i) Burnco works with the Pelican Shores South HOA board to ensure that historic hydrological balance is maintained per state statue and (ii) to develop a dewatering plan so that no adverse effect or decrease in the Pelican Shores South lake levels is allowed to occur during or after mining operations are completed.

A potential solution to our lake level concerns is that during the dewatering of any of the proposed cell(s), any groundwater that is being removed in any cell(s) be pumped into the Pelican Shores South HOA lake and for discharge into the St. Vrain river by means of our outlet. We are aware that this may require approval by the Division of Water Resources. However, if this becomes an express requirement of the DRMS permit then there is a higher likelihood that the mine operator will make our concerns a priority while mining. Long term solutions to ensure that ground water is not prevented from flowing to the Pelican Shores South lake will likely require additional investigations and discussions with Burnco.

We of course are happy to discuss our concerns and solutions with you, your staff or the proposed mine operator.

Thank you for your consideration, time and allowing us to comment on this proposed mine amendment.

Sincerely,

Stephen Ceresa
President
Pelican Shores South HOA Board of Directors