STATE OF COLORADO

Eschberger - DNR, Amy <amy.eschberger@state.co.us>

Denver Water Comments on CLL Amendment Application (AM-05) File No. M-1977-300

Poncelet, Nicole <Nicole.Poncelet@denverwater.org> Tue, Oct 27, 2020 at 4:46 PM
To: "Eschberger - DNR, Amy" <amy.eschberger@state.co.us>
Cc: "Arnold, Daniel J." <Daniel.Arnold@denverwater.org>, "michaela.cunningham@state.co.us" <michaela.cunningham@state.co.us>, "jim harrington (jim@coloradolegacy.land)" <jim@coloradolegacy.land>

Dear Amy,

Please find attached Denver Water's comments on the latest amendment application concerning remediation of the Schwartzwalder Mine?

-Nicole

Nicole M. Poncelet-Johnson, PE, CWP | Director of Water Quality & Treatment Team
Denver Water | c: 720-878-6088
denverwater.org | denverwaterTAP.org
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20201027 AM-05 Public Comment_Denver Water.pdf
131K

DENVER WATER

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Sent Via Email

October 27, 2020

Amy Eschberger
Division of Reclamation, Mining and Safety
1313 Sherman Street, Room 215
Denver, Colorado 80203

Re: Schwartzwalder Mine – File No. M-1977-300, Colorado Legacy Land, LLC – Amendment Application (AM-05)

Dear Ms. Eschberger:

Denver Water is submitting the following comments in response to the Amendment Application (AM-05) to modify Colorado Legacy Lands, LLC (CLL) Division of Reclamation Mining and Safety Permit No. M-1977-300. The request for public comments was published in the Denver Post on September 17, 2020. Specifically, the AM-05 scope is to modify the permitted affected lands boundary to include the Black Forest Mine, which will be used for disposal of uranium impacted sediments. CLL states in its application that, "The Black Forest Mine is a dry mine that does not have contact with groundwater or surface water. Excavated materials will be disposed of either in the Black Forest Mine or the CV Glory Hole within the Schwartzwalder Mine. Once excavation is complete, watertight bulkheads will be used to permanently seal all mine portals."

Denver Water requests that CLL demonstrate how the proposed AM-05 activities will be taken into consideration in the development of its conceptual site model (CSM) and requests that CLL provide the following:

1) The hydrogeologic data to demonstrate that the Black Forest Mine will not contact groundwater or surface water and will not develop alternative pathways when the watertight bulkhead is installed.
2) The design of the watertight bulkhead and the associated closure plan.
3) The vertical gradient of groundwater in the vicinity of Ralston Creek and Black Forest Mine.
4) Denver Water agrees with DRMS's adequacy review comment on Exhibit G and requests that CLL also provide the depth to groundwater and potential interactions between the fault fracture zones and Ralston Creek.
5) Evidence of an inward gradient of groundwater into the Schwartzwalder mine and discussion of how that inward gradient influence extends to the Black Forest Mine and whether it will it be maintained.

Denver Water requests that CLL include in its future CSM the potential impacts from placing sediments into the Black Forest Mine.

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We appreciate the opportunity to provide these comments. Please contact me at 720-878-6088 if you have any questions.

Sincerely,

Nicole Poncelet-Johnson, PE, CWP
Director of Water Quality & Treatment
Denver Water

cc:
Michael Cunningham, DNR
Jim Harrington, CLL