



April 19, 2021

Jerald Schnabel
Castle Aggregate/Transit Mix Concrete
549 E Cucharras Street
Colorado Springs, CO 80903

RE: Hitch Rack Ranch, Monitoring Wells - File No. P-2017-008,
Surety Release Request Application (SL-1) Second Adequacy Review

Dear Mr. Schnabel:

On April 2, 2021, the Division of Reclamation, Mining and Safety received your responses to our January 29, 2021 preliminary adequacy review letter for the Surety Release Request for the Hitch Rack Ranch, monitoring wells Notice of Intent to Conduct Exploration Operations. The response suggests the January 29 letter was not understood very well. The discrepancies are related to Division of Water Resource (DWR) Permit numbers not matching DRMS records from 2018 or DWR permit locations being more than 200 feet from the field locations for the monitoring wells. The fact that different IDs (site labels vs. DWR Permit nos.) as well as two different coordinate systems (longitude/latitude vs. universal transverse Mercator [UTM]) are used for the monitoring wells appears to have added to the confusion. The two amended DWR monitoring well location forms moved the respective locations for LTC-GW-02 (DWR Permit No. 307473) and LTC-GW-3 (DWR Permit No. 307473) farther away than in the original surety release request submittal. Instead of providing the discrepancies in narrative form, I've created a table showing locations and DWR permit numbers for each of the seven monitoring wells (see attached **Table A**). The discrepancies and suggested corrections are highlighted in yellow. All UTM coordinates are shown in blue text. Portions of the table based on identical reference sources are shaded the same color for separation from differing sources. The UTM and long/lat. coordinates with the same shading plot in identical locations in Google Earth.

The text from the January 29 PAR letter attempting to explain the discrepancies follows (with the intent that combined with **Table A**, the discrepancies and corrections will be better understood):

1. LTC-GW-1. The Division of Water Resources (DWR) permit (No. 307364) provided for LTC-GW-1 is actually for LTC-MW-7. According to previous submittals, the DWR permit no. for LTC-GW-1 is 307358. Please provide the correct DWR permit for LTC-GW-1.



2. LTC-GW-2. The longitude and latitude (-104.8877058°; 38.5651500°) in the Permanent Abandonment Final Report is more than 200 ft from the location stated in the DWR permit no. 307473 (UTM coordinates: 509856.0E; 4278527.0N) and more than 300 ft from the location DRMS has from GPS field collected data. Please provide a revised Permanent Abandonment Final Report with the correct longitude and latitude for LTC-GW-2.
3. LTC-GW-3. The longitude and latitude (-104.8980686°; 38.6589612°) in the Permanent Abandonment Final Report is more than 200 ft from the location stated in the DWR permit no. 307360 (UTM coordinates: 508816.0E; 4278868.0N) and more than 300 ft from the location DRMS has from GPS field collected data. Please provide a revised Permanent Abandonment Final Report with the correct longitude and latitude for LTC-GW-3.
4. LTC-GW-7. The Division of Water Resources (DWR) permit (No. 307473) provided for LTC-GW-7 is actually for LTC-MW-2. According to previous submittals, the DWR permit no. for LTC-GW-7 is 307364. Please provide the correct DWR permit for LTC-GW-7.

The Division has recommend release of reclamation liability for P-2017-008, once the aforementioned discrepancies with the Permanent Abandonment Final Reports have been resolved. We appreciate your diligence in addressing these discrepancies so that records can be finalized and the financial warranty release can be expedited.

If you have any questions, please contact me.

Sincerely,



Timothy A. Cazier, P.E.
Environmental Protection Specialist

Enclosure: Table A

ec: Michael Cunningham, DRMS
DRMS file

TABLE A. Monitor Well Tracking Discrepancies

Permit No.	P-2017-008						
Site Name:	Hitch Rack Ranch						
Prospector:	Transit Mix Concrete Co						
County:	El Paso						
Specialist:	T. Cazier						
Bore Hole ID	LTC-GW-1	LTC-GW-2	LTC-GW-3	LTC-GW-4	LTC-GW-5	LTC-GW-6	LTC-GW-7
DWR Permit No. (ref. March 9, 2018 Transit Mix Reponse, p. M-3)	307358	307473	307360	307361	307362	307363	307364
SL-01 Request DWR Permit No.	307364	307473	307360	307361	307362	307363	307473
Comments (corrective actions highlighted in yellow)	Wrong DWR well permit submitted (307364), Need DWR Permit No 307358	DWR Well Permit No. Accepted	DWR Well Permit No. Accepted	DWR Well Permit No. Accepted	DWR Well Permit No. Accepted	DWR Well Permit No. Accepted	Wrong DWR well permit submitted (307473), Need DWR Permit No 307364
DRMS Records Monitoring Well Location (deg) [^{Lat} / _{Long}]	38.661292°	38.655519°	38.658293°	38.657699°	38.656421°	38.655774°	38.656208°
DRMS Records Monitoring Well Location (UTM) [^{Easting} / _{Northing}]	-104.903777°	-104.886830°	-104.898847°	-104.894081°	-104.898033°	-104.886121°	-104.885064
DRMS Records Location Source	508371.71	509846.9	508801	509215.73	508872.08	509908.59	510000.46
	4279195.24	4278556.4	4278863	4278797.51	4278655.29	4278584.79	4278632.95
DRMS Records Location Source	1/30/18 DRMS Inspection GPS Field Location	1/30/18 DRMS Inspection GPS Field Location	6/13/17 Pre-Op Inspection GPS staked Location	6/13/17 Pre-Op Inspection GPS staked Location	6/13/17 Pre-Op Inspection GPS staked Location	1/30/18 DRMS Inspection GPS Field Location	1/30/18 DRMS Inspection GPS Field Location
Location from SL-01 Permanent Abandonment Final Report (deg)	38.656173°	38.6561500°	38.658961°	38.657439°	38.656692°	38.655709°	38.6561500°
Location from SL-01 Permanent Abandonment Final Report (UTM)	-104.884904°	-104.8877058°	-104.898069°	-104.894219°	-104.897909°	-104.886428°	-104.8877058°
	510014.42	509770.62	508868.60	509203.78	508882.80	509881.00	509770.62
	4278629.14	4278626.29	4278937.16	4278768.65	4278685.43	4278577.00	4278626.29
Distance from SL-01 Permanent Abandonment Final Report location to DRMS GPS location (ft)	5699	339	329	102	105	94	754
DWR Location from SL-01 Well Permit Form (UTM)	Wrong permit provided not available	509856 4278527	508816 4278868	509217 4278795	508873 4278664	509911 4278558	Wrong permit provided not available
Distance from SL-01 Permanent Abandonment Final Report location to DWR Well Permit location (ft)	not available	430	285	97	77	116	not available
Comments (corrective actions highlighted in yellow)	Wrong DWR well permit submitted (307364), Need DWR Permit No 307358	DWR Well Permit location more than 200 feet from SL- 01 Permanent Abandonment Final Report location	DWR Well Permit location more than 200 feet from SL- 01 Permanent Abandonment Final Report location	Distance is less than 200 feet, therefore acceptable	Distance is less than 200 feet, therefore acceptable	Distance is less than 200 feet, therefore acceptable	Wrong DWR well permit submitted (307473), Need DWR Permit No 307364
Distance from DRMS GPS Field location to DWR Well Permit location (ft) (for reference ONLY)	not available	101	52	9	29	88	not available
DWR Location from 2/25/21 Well Location Amendment Application (UTM) Provided 4/1/2021	no change no change	509910 4278585	509841 4278554	no change no change	no change no change	no change no change	no change no change
Distance from SL-01 Permanent Abandonment Final Report location to Amended DWR Well Permit location (ft)	no change	477	3428	no change	no change	no change	no change
Comments (corrective actions highlighted in yellow)		DWR Well Permit location more than 200 feet from SL- 01 Permanent Abandonment Final Report location. Revised coordinates appear to be for LTC-GW-6	DWR Well Permit location more than 200 feet from SL- 01 Permanent Abandonment Final Report location. Revised coordinates appear to be for LTC-GW-2				