

January 3, 2022

Rob Zuber  
Colorado Division of Reclamation, Mining, and Safety  
1313 Sherman St, Rm 215  
Denver, CO 80203  
(303) 866-3567

Delivered Via Email  
**RE: Bennett Pit, Permit No. M-1979-166**  
**Technical Revision 05 Adequacy Response - Addendum**

Mr. Zuber

In addition to the information provided in my January 3, 2022 letter, I would like to point out the following regarding the Bennett Pit approved permit and technical revision 05:

The currently approved reclamation plan is for a 9.5 acre lake (Exhibit E, pg. 1). This refers to the planned groundwater lake covered by the approved gravel well permit. The gravel well permit is explicitly for 9.5 acres of ground water exposure. It is clear that the reclamation plan is for a 9.5-acre groundwater lake. The mining plan and mining plan map both outline a 9.5 acre "gravel extraction area". However, given that ground water is several feet below the surface, it would not be possible to achieve the 9.5 acres of groundwater lake with 9.5 acres of "gravel extraction". Slopes alone would increase the excavation area as several feet of overburden sit atop of the groundwater table.

The proposed technical revision still creates 9.5 acres of groundwater lake. The mining map and mining plan from the approved CN-01, if followed exactly, would prevent the groundwater lake from being built to the extent allowed in the gravel well permit and in the reclamation plan. The mining plan and mining plan map are clearly inaccurate. Approving technical revision 05 allows for the successful implementation of the approved reclamation plan with clearer and more accurate maps, as requested by the CDRMS inspection in August 2021.

Please contact my office with any questions.

Regards,



Ben Langenfeld, P.E.  
Lewicki & Associates, PLLC  
benl@lewicki.biz  
(720) 842-531, ex. 1