



Jun 29, 2022

Kyle Regan
Civil Resources, LLC
8308 Colorado Blvd. Suite 200
Firestone, CO 80504

**Re: Monarch-DENM Gravel Mine, File No. M-2022-009, 112c Permit Application,
Third Adequacy Review**

Mr. Regan:

The Division of Reclamation, Mining and Safety (Division/DRMS/Office) reviewed the contents of your adequacy responses (letter dated June 8, 2022) for the Monarch-DENM Gravel Mine, File No. M-2022-009 and submits the following additional comments.

The following headings indicate the item number from the preliminary adequacy review letter.

Item #1

No additional response required.

Item #2

No additional response required.

Item #19

In the Weed Management Plan (begins on page E-6), please make the following revisions:

- In the first paragraph of this section, add the following sentence to the end, "Efforts to address List C species will follow guidelines of Weld County weed experts."***
- The third paragraph (starting with "The presence of noxious weeds will be monitored annually ...") should be deleted. It is the Division's policy to require mine operators to control weeds when they are identified. It is not appropriate to allow weeds to reach a certain percentage of species or percentage of cover prior to implementing control practices.***



Item #25

Per our conversation on June 9, 2022, the Division requires that an underdrain be added to the Mining Plan and associated map (Exhibits C and D) with a commitment that this will be built prior to slurry wall construction.

Item #32

No additional response required.

Regarding the geotechnical analysis, no additional response is required.

The Division has looked closer at Exhibit L, Reclamation Costs, and has the following additional adequacy items. In the context of these items, please update Exhibit L or other portions of the application, as appropriate.

Item #L1

Explain the fact that the cost estimate covers concrete pads and foundations, but there are no costs for the superstructures. Please add these costs. In particular, add costs for the large concrete silos.

Item #L2

In your adequacy response of June 3, 2022 (Item #12), you stated that “a large quantity of overburden is not anticipated to be utilized in reclamation.” Does this address the backfilling operation at the freshwater and siltation ponds? In the Exhibit L table, the costs for backfilling these ponds are substantial, suggesting that there may be hauling costs in the total amounts in Section B. of the table. Please clarify and elaborate on the location of stockpiles to be used for backfilling.

Item #L3

Explain the differences between Exhibit L and the Mining Plan Map, C-5. In particular, the volumes in Section B of the Reclamation Costs (reclamation of the Freshwater Pond and the Silt Pond) require explanation when compared to the volumes listed on C-5. For example, on the map the volumes for the Siltation Pond are 826,300 CY for AG and 130,600 CY for OB), and in the cost table the value is 655,000 CY (prior to multiplying by 50%).

Item #L4

Explain the reason for multiplying by 50% for the volume of the Siltation Pond. Will this pond be large enough to function properly?

Item #L5

Explain the difference between the unit cost in the text of Section F. for slurry wall costs (\$6.92 per SF) and the value in the table (\$5.12 per SF). Also, for the slurry wall costs, please include a bid from a contractor to support your estimate.

Item #L6

Add costs for the construction of the underdrain at Cell 1. Please include a bid from a contractor or other supporting documentation.

The Division is currently required to issue an approval or denial decision no later than July 1, 2022. If your organization cannot address the concerns in this letter by June 30, 2022, **please request an extension to an appropriate date (allowing the Division at least two days for review time).**

If you have any questions, please contact me at rob.zuber@state.co.us or (720) 601-2276.

Sincerely,



Robert D. Zuber
Environmental Protection Specialist

Copied via e-mail: Michael Cunningham, DRMS
Eric Leigh, MMMA, LLC