

July 26, 2022

Mr. Patrick Lennberg Environmental Protection Specialist Department of Natural Resources Division of Reclamation, Mining and Safety Room 215 1313 Sherman Street Denver, CO 80203

RE: Additional Information Request No. 3 Lyons Quarry, Permit No. M-1977-208 Y22Q1 Groundwater Monitoring Report, C-Pit

Dear Mr. Lennberg:

On July 8, 2022, CEMEX received a third letter from Division of Reclamation, Mining and Safety (DRMS) titled "AdditionalInfoNeeded_No3_M77208_1Q2022.pdf" related to our 2022 1st Quarter Groundwater Monitoring Report. Below are CEMEX's responses in *italic font* to items #1-5 in that letter:

1. The boring log and well construction diagram provided in the response is for CEM-005 installed in 2007 and was later abandoned due to a collapse of the well. Please provide the boring log and well construction diagram for CEM-005 that was installed in 2012.

CEMEX Response:

See attached CEM-005 Compliance Well Report prepared by Pacific Western Technologies on behalf of CEMEX. The report submittal to DRMS is dated April 27, 2012.

2. The Operator provided field data sheet for CEM-005 is difficult to understand. It appears there is approximately 3 feet of water contained in the 4-inch monitoring well and approximately 2.3 casing volumes or 4.5 gallons of water were removed prior to the well going dry. Please confirm this is the case. Additionally, what method is being used to purge the well?

CEMEX Response:

Yes, those calculations are correct and that was the case during the Q1 2022 sampling event.

The well is purged using a stainless steel 2-inch bailer with a bottom ball valve and a mechanical winch.

3. What times were the initial and final water levels taken? Typical industry standard operating procedures for sampling low yielding wells is to return to the well within 24 hours of purging the well dry to collect another water level to determine if there is sufficient volume to collect a sample, was this done at CEM-005? If not why?

Via Email



CEMEX Response:

Initial water level was 393.98' @ 10:00. After bailing, the water level was 398.03' @ 12:00. CEM-005 water level was checked at the end of the day (17:30) and there was not enough volume to collect sample (398.09'). This method of bailing and later checking the water levels has been conducted for several years with no significant recharge to be able to collect a sample, even days or weeks following bailing.

4. It is apparent to the Division that CEM-005 is not a dry well and does recover in time. Any water that enters the well after purging dry is considered representative of formation water. The Operator needs to collect a sample from CEM-005 beginning in the 3rd Quarter 2022.

CEMEX Response:

Based on historic sampling observations, CEM-005 does not produce enough water to collect representative samples of the groundwater conditions; the well takes significantly longer than 24 hours to recover to a level needed to collect a sample and can take days to weeks, even months to recover. During this time, the groundwater is exposed to the atmosphere and surrounding formation, meaning it is less likely to represent the groundwater conditions in the aquifer.

5. The purpose of passive or no purge sampling devices is to eliminate the need to purge a well at all. Please explain why the Operator contends such sampling methods would not provide accurate water quality data?

CEMEX Response:

Passive samplers are designed for well conditions where the groundwater flows across the sampler; this is not the case with CEM-005. Below are excerpts from USGS Techniques and Methods 1-D8 (Imbrigiotta 2020) describing why the conditions of CEM-005 are not suitable for passive samplers.

"Passive sampling of groundwater relies on the ambient exchange of groundwater in the formation with water in the screened or open interval of a well."

"If the well is screened in a less permeable or a hydraulically tight formation, the concentrations of constituents measured using a passive sampler may represent the concentrations in the well over the past few days but not the concentrations present in the formation. The reason for this is the slow flushing times of wells in low-permeability formations, where mixing or chemical reactions may be taking place in the well, such as volatilization losses of VOCs in the water column of the well (McAlary and Barber, 1987), which are not occurring in the formation. Mixing or chemical reactions may cause a passive sampler in such a well to collect samples with concentrations different from those in the formation."



The intent of CEM-005 is to sample groundwater within the Carlile Shale formation, though the groundwater in CEM-005 is likely coming from fractures within the Fort Hayes limestone formation above or from the contact between the limestone and shale. It is not clear from the lithological logs during well installation what interval the water is coming from exactly. The well is completed in the shale and there is likely no flow through the shale to accommodate passive sampling techniques.

If there are any questions regarding this Response Letter, please feel free to contact me at <u>scotta.harcus@cemex.com</u> or via phone at 303-823-2124.

Best Regards,

Scott A. Harcus Lyons Plant Environmental Manager

REFERENCES:

Imbrigiotta, T.E., and Harte, P.T., 2020, Passive sampling of groundwater wells for determination of water chemistry: U.S. Geological Survey Techniques and Methods, chap. 8, section D, book 1, 80 p., <u>https://doi.org/10.3133/tm1d8</u>.

ENCLOSURES:

• TR-11: CEM-005 Compliance Well Report, submitted to DRMS on 4/27/2012



April 27, 2012

Mr. Michael Cunningham Environmental Protection Specialist Division of Reclamation, Mining and Safety 1313 Sherman Street, Room 215 Denver, Colorado 80203

Via Certified Mail Return Receipt Requested 7011 0470 0002 0359 4047

Re: CEMEX Lyons Mine Permit M-1977-208 Technical Revision No. 11, Compliance Well Report

Dear Mr. Cunningham:

Enclosed is the CEM-005 compliance well drilling report prepared by Pacific Western Technologies for CEMEX.

If there are any questions regarding the above information or the attachments, please contact me at (303) 823-2115.

Sincerely,

Denise Arthur, Ph.D.

Environmental Manager 5134 Ute Hwy PO Box 529 Lyon, CO 80540

Encls.\ Compliance Well Report



April 24, 2012

Dr. Denise Arthur Environmental Manager CEMEX Lyons Cement Plant 5134 Ute Highway Lyons, CO 80540

Subject: Geologic Well-Site Report for Replacement Compliance Well, CEM-005

The following is a summary of drilling and well construction activities for replacement Compliance Well, CEM-005 for the CEMEX Lyons Cement Plant. Mr. Richard McPeek, Pacific Western Technologies Field Geologist, compiled this report.



Figure 1: Photograph of well site prior to the start of drilling on 3/28/12, looking east.

www.pwt.com



Summary: The CEMEX cement plant is located east of Lyons Colorado. The facility consists of a quarry for the mining of high calcium carbonate shale and the Fort Hays Limestone, both at the base of the Niobrara Formation, for the production of cement. Previously drilled water monitoring well CEM-005 became damaged at a depth of approximately 50 feet below ground surface (BGS) when the Schedule 40 Polyvinal Carbonate (PVC) pipe broke. Well CEM-005 is intended to sample water within the Carlile Shale, which directly underlies the Fort Hays Limestone in an effort to monitor the water that may migrate from the cement kiln dust disposal site (C-Pit) to groundwater. In an effort to reduce the likelihood of repeated well damage, the new well was constructed with Schedule 80 PVC pipe. The new well was designed to mirror the previous CEM-005 as closely as possible.

Drilling Timeline: Drilling started on Wednesday March 28, 2012. Conditions on March 28, 2012 were partly cloudy and 70°F with 5-10 miles per hour (mph) winds from variable directions (predominantly southeast and south). On this date, the well was drilled from ground surface to a total depth of 400' BGS. Conditions on Thursday March 29, 2012 were partly cloudy and mid 70s °F with 5-10 mph winds from predominantly southeast and south. On this date, the well casing was set to total depth, the sand filter pack was placed, and the bentonite grout seal was placed to a depth of 204 feet BGS. The grout was not placed to surface on this date because the grout set up too quickly in the tremie pipe, rendering the tremie pipe unusable.

Conditions on Friday March 30, 2012 were partly cloudy and mid 70s °F with 5-10 mph winds from the southeast and south. On this date, the well grout was placed to surface, the conductor casing was pulled and the well was bailed and developed. On Monday April 2, 2012 drillers returned to the site, reported that the well was not producing water (only a few gallons were in the bottom of the well, as indicated by a water level indicator). Subsequently they backfilled the cuttings sump, placed a converter on the top of the casing to convert the top to accept a J-plug designed for Schedule 40 PVC (no J-plug is made for Schedule 80), placed the protective metal casing on the well, constructed a concrete well pad and demobilized from the site. PWT was not on site on Monday April 2, 2012. CEMEX personnel verified the work conducted on April 2, 2012..

Lithologic Descriptions: The well lithology was similar from the first encounter with bedrock at (approximately) 36 feet to the first contact with bedded limestone at (approximately) 273 feet BGS.

The Smoky Hill Shale is described as follows:

Black (Munsell Color 5Y 2.5/1), carbonaceous, moderately hard, platy to blocky, fair to good fissility, petroliferous smell, silty and overall increasing in calcareous content with depth.

Accessory minerals included:

<u>Chert</u>: Brown (Munsell Color 10 YR 5/3), moderately hard. <u>Limestone</u>: White (Munsell Color Gley 1 8/), moderately hard, crystalline. <u>Pyrite</u>: Crystalline, hard.

The Fort Hays Limestone is described as follows:



Limestone: Dark grayish brown (Munsell Color 10YR 4/2), moderately hard, platy, fossiliferous.

The underlying Carlile Shale is described as follows: <u>Sandy Shale</u>: Very dark gray (Munsell Color Gley 1 3/), sandy, poor fissility, moderately hard, argillaceous, thin bedded, non calcareous, bordering on a very fine grained sandstone.

For additional detail, the hand written log can be found in Attachment A to this report.

Well Construction Details: After the successful drilling of CEM-005 to 400 feet BGS, the details for the well construction were discussed first with Ingram drilling and then with the CEMEX Environmental Manager. It was desired by CEMEX that the well mimic, as closely as possible, previous well CEM-005. The goal was to have the screen fall into the Fort Hays Limestone and the underlying Carlile Shale Formation, with the goal of monitoring the groundwater that may be influenced by C-Pit. The total depth for the original compliance well, CEM-005 was 401 feet BGS, with the screened interval spanning from 388 feet to 398 feet BGS. The boring log from the previous contractor indicated the casing could not be placed to total depth, and showed a cobble symbol from 398-401 feet BGS. It was presumed that the interval between 398 and 401 feet BGS was filled in with slough from the overlying lithology, that was caved in as the casing was run into the hole.

For the replacement well, the 10 foot section of Schedule 80, 10 slot PVC screen was capped with a 6-inch end cap. As a protective measure, 6 inches of filter pack sand was placed in the hole to provide a cushion layer on which the casing to sit. A PVC centralizer was added at the base of the screen, where the end cap was attached. The next centralizer was placed on the casing section 8 feet above the screen. Centralizers were placed every 20 feet up the hole at depths of 320 feet, 240 feet, 160 feet and 80 feet BGS. Upon placement of the casing to total depth, it was found that the casing could not be placed to total depth and that approximately 3 feet had caved in upon casing placement. This placed the new total depth at 397 feet BGS. With the 0.5 foot of cushion sand meant that the bottom of the hole was now at 396.5 feet. After subtracting 0.5 foot for the end cap, it meant that the screened interval would instead be from 386-396 feet BGS. The corrective action of removing the casing, rewashing the hole and replacing the casing was considered. Ingram indicated that they could do this but cautioned that the more you wash a shale hole and disturb with casing placement, the more friable the walls could become, making the cave-in worse, ultimately resulting in a lost hole. CEMEX was informed of the situation and agreed that placing the screened interval 2 feet higher than intended was acceptable, as long as the Fort Hays Limestone was still screened into the Carlile Shale. According to the well log, it would still be cased as desired and Ingram was directed to start with placement of the sand filter pack.

The sand filter pack used 8/12 mesh sand. The previous well had sand placed from 378 to 388 feet BGS. Ingram indicated that, as a general practice, having only 10 feet above the screen was not advisable because this was not always enough to prevent grout intrusion into the screen. Ingram recommended a minimum of 20 feet of sand above a screen. Because the screened interval on the new well would be from 386-396 feet BGS, 20 feet of sand would place the filter pack into the Smoky Hill Shale. Because monitoring the Smoky Hill Shale is not the intent of



this well, 20 feet of filter pack sand was not possible on this well without deepening the hole. The first solid limestone bed encountered, as indicated by a distinct change in drilling characteristics (harder drilling), was from 373-374 feet BGS. It is for this reason that the filter pack could not be above 373 feet in the well. After consulting with CEMEX, an extra 3 feet of transition sand was added to give an extra degree of protection to the screen from grout intrusion. The fine transition sand was added from 373-376 feet BGS. The well was grouted and developed (see Drilling Timeline section), the surface casing set, and the protective pad constructed.

If you require any further clarification or information, please contact Richard McPeek at 274-5400, extension 23.

Sincerely,

PACIFIC WESTERN TECHNOLOGIES, LTD.

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Dorthea Hoyt, PE, PMP PWT Project Manager

Attachments: Attachment A-Lithologic Borehole Log Attachment B-Project Log Book Copies

ATTACHMENT A

LITHOLOGIC BOREHOLE LOG

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Sara dea is varted toros - Start Colle two/2) 10' Moenearts ş Water Farchrilling is getting low, Will all rid acrosses a chert in theirs Solar DR 1, the logic changes other thing 72月74 ł -mestone in sumly (gu) sample), a layous too 5. O.V \$410) former sweet M Joy Sanne 174 - Safter divilition we to similar litholeer 4 Prite weaple Sample N SAMPLE A. Sundo Sample Since WERNING SOON-214 Sample Vis lithday (100:114' BGS 9a' B'C' 221 L' H Shert 5 CR1 10539484EMB 37 - 20 . М М 1 69' 2 S t Ø Sect 123 1 HULL LET 20 [**H**0: 2 17,2 S Ţ i)ha 115 950 050 1 This badded nod got to not cite good traint Start encourtais us on the blocky fair fiss, lity 14 " bable topsoil measurement, it Ria Tender RTT Support truck with Grace It is nation water at the OWWOW Housdarilling () H7' 251' Smurpe () 5144, 544 R Black 542.5 8.5 april is bring produced from top AS glowe Black is a Gara Star So KDH with a Sit diample 5 and 811 to 7 Accolution is baing used with a a 4 med bedding, non- a larrows 30445 2995= 20, Bas -, 2 S Z 1 col lav Ň divin hole harmonic. Bag Sample 36: B65 Vaning 8" bit Ntillale Peters (Ferrier freezes diversity Suntare Casilia hy rack. She b- 5Y 6 rs dill They ab vel for a Sulface - 3, 0951 : KUMANINA Surface aquina lanander ivaplancited Parter Part O Way McDeek Wed 5 3-28-12 Monution NGG IN VIE Male. A Em Phylicated Mp. Ward tart ANO. Swittare. fe "! * ž (NJA 100 Wp 0 010 0435 ų 070 5501 0943: 2126 737 1

" Shale, less calbuacana than betwee face 1424: 374. Kredenmenty Shale, less captures ample was ~Solgshe. Hedomintly shap will esserance of discussed logging new wells asparily as 1416 = 360 Sample Back to predomintly shale Chilling changed, may be n'to 0YPL4 Fischer Shelle S Shalp with 373 whe adrilled brock redicting a LS bad Retrick) Sev Sev tor at 3-28-12 Mcleon Weds when Will 20 Sample Sample Sample Dar Kary, mica const. 1400 1/15thor to 51k will lector and a ht its . 391 Sample Moder A 55:114 1444: 347-49 Sample -mestave Frant Hays 394 1432 338 430 382' 5005 29 Next work. 369' 1412 Z64 1438: 136: 424 1421 . Ontroliferous lead, V. Calcarens, matter -Sig d & applyish produce TO YK 4/2 accessory amorals have been listed in the babook. dictomena Black 57 2.5/1 2 é au Shale with verying aflareous fontait. Note: And De Indiany legging Durposes 500 he day loss have an ort of water harder Thyn, bedder , med soft, tan't fixility 150 1 hole 15 ſ 1311: 344 Sample, Very calarpans 353 \$40 ALS bad à drilling do 1244: 294' sample -abuild print. There wal From 54-1225: 254 'serge printe, LS 9 274 Sample - phile 264 Samp-pyrik 3-28-12 gravish and 5angle 04 170 324 Sample 304 sample 1304: 334 Sample DIATY L MON 314 sample The litholay Primar 14 a 1239 2841 Sample 2 Kgpm. 1 Paral 244 No He 4 mund Maltin 220 j X 1300 -1254 1250 233 :

then is to ź 1600: Briefing J/CEMEX is done; Ve convene @ ~0830 tomorrow. 1) V 3-28-12 Meden 3-28HZ Z A cushion layer at said & a.K. out the lattom of the look ie construction is did as was 23 willeitherned 3.5 gpm at the part 388 was book july ENESWY & Das The top what preficined by with alternatives and pack (2) 378 or instead 380-400. the too +5-355 uned that 382-388 >78-398. Beause Duc V Alled with sould. This is betted as and the sand will be win form from Tap 1+ w/11 40 Construction S. S. CEMEX I they would last well waking water @ ~ 194 ' NE FLAT Hays was grade that all Based upon chilling characteristics. 388-398' wix. there have minic the the well was philled to 400' he we Section of casiling a lubal on the bottom abue the screen. LS labour Had 7-28-12 Meder /Shap hole is nothing Squalback way from 3 Screen Him consulted an this the driller or me ENDOS lisclosed with Limestore, he have started EMEX Discussion 398-4009 There have, 1 In a ditto. is solid たら Shalle/ to 22' dave with Riso t'in ć 5 A Part Q 5 Ŕ

A. .

Clarken 1	Vite 2 (EMEX to set and doelon P. cloudy, which is variable but maintly 0-5 uph Kown the E Determine Static water lovel		7-29-12 Mapler	
Derection Line	Vite 2 CEMEX & set and deserve P. cloudy, wind is variable but mismatly 0-5 uph Rome the E, of Determine Static water level	3%	Netar	(
Merther Planettier Corpeter Locket	Rited to MEX to set and descent P. cloudy, wind is variable but mismatly 0-5 uph Roma the E, of beday is Determine Static water level	33/	Smy-T.	5-
Plan of the of Set	P. cloudy, wind is variable but when the O-Saph Romenthe E. DS OF. Determine Static water level		tep of Bat H	<u> </u>
Plan of the	when the O-Sach Rome the E. DS OF. Determine Static when level			La/ell conditioned
Planof tru	15 OF. heday: Determine Static weber love			detail (not to
Llenot try	weday: Determine Static weter level			Jake)
to set				
A growth	MARCH - KIN KIN Sand res			
Woll Mr	Screen at dreshed in tenally set caring			
		, do c		400
	PRODUCE + 5 Cheduled For tomarrow.	to -	,) /	200 - 100 or 2000
M Cool	the tert of 17 base			
	UE 309			
-1	. Of Saw has been added to the bottom)	
ot to	he tale. This a lows for the screen to be			
sette	2 3 18, 1 a lowing Por a 6" super on			
	Leg This will minic the previous well			
	CM-COS/ as requested by the client.	301/)	Bottom of Port Hays
	201 mas 201-398' witha PUC rentalizer	100		Centralizers were plead
	the b End cap and mutues on the			~ ON 6" End capaired
	2077 the Sandpack. Even size was 10 5 lot.			1
1 Line -	Eridis used und Colorado & x12 same		, ,	
and and	AE C-1 -al Stan uter Societion Barbarte	A set of the		2 - 3 COR 3 CB
			endan	. ; 6 end ap from 38-38
A LING	Ran (2 1) pe 15 Borlig run into the loole.	343		
	The Pipe is plued to with a 370 and	કેવવ	6C-1 - 50	- > 12 cot state 4 for the
ž Š	out inprovements 50 0 miles ready to	r ooh		100

ŝ 386- Topofection OBJE SOUN xe - beton of 376-1000F Screen. 38:5 400, 4 ŧ ¥ þ ; ۱ ų , i 4 3-29-12 Thues (5/bughend) endary -3 ч 1 ł ----۱ ۱ ï L • \$ ۱ ŧ . Ŀ from the wat is the Top of to 373 ' The Start of Complete Line of Dave was 375' 374' with Kelish LS 382' Et is believed that the Estra transition Sewel would odd protection and still be separated from the overlying Shalk. bet at the transition scurch be placed recommandial that 10' of coarse (8x12 3 8%-3 9% with top of sould being 378. Trans • This means that then the screen will not James af ient Accounted towned is sharp on 376.5) \$376. , the Screan & out intrusion who the science It is EM-005 ion tained 10 of sciel a bove the suber The drilling Contractor, addings against 89, esing is run. It appears that (on tratifier was placed at the base of the screen and () 330' CEM-005) was , as requested by the 09 or st exactly as the previous well Next centralizer was placed (2) 320 Next controlized was pleced a) . 410 ONLY 10 1 OF Saudabore the screen The score as section was Next celetralized wis placed Next Celtralizer was placed a the hole slowing in 3.5' DVC Casha.) matter EM-005. This well Section will be 386-396. 3-20-72 McPeer be placed troug A 9M May Dage 11. Ctarty Saud 51 0 1311: 300 1200: 1245 1220 11:30 0

the pH of the formation water is un favorable flaghes solid in the tranielke. Count vice trappeder 204' BG.S. Thrank pipe ~ The grauts sets up factor Weather Mostly clar W= U-S from NW, 260F 0930: Reconversith chrillers No rigid pux her wust try her indicated Bailing / Jacobagent of well starts. Bailey removes 7 553 allows per trip. anthe last well and that 1845 - Wellis build to the part where and Marchart The well have will be sheer well is in the hole its start granting. akar Miller ~ Sgg llon is borner Danduced again witth the spool at the HRAMIE Dipe was available. grow the well Dad set Conductor cysing is fulled. 3-20-15-3-30-12 No Florent Fri McDopul (Similis Surface Ear bentran le gread. 1154: Beengrutua thomasual and this highlened 1430 1245: 1125: 1278: in the Fort Hays. The following was discussed: This one by necessity will be screened \$86-316 The vell will 54:11 be screened from on within solid Fort Hays filmestare, as well ou top af the Sx (2 sand to add exta The previous well was screened from 3188-398 Morthur Raw CENEX. She expressed concern about the screen body set · Basedupon our discussion and CGMGK protection against growt intrusion. The dop the solid Limestone back failing from 373the well was set as illustrated on of the trugition sand will gill be below 600 2+3 of Hansitian saw will be placed as the underlying shalp, as desired 6)5 Leave site. Well ups grouted to r and Alterneed her of the situation. 450: Transition sandis set to \$73 Récorrere 2 0930 + d'avorrou blars be follow them is plugged Rentation 3-29-12 Mcgeer Tukan Maked Start graphs no. 2 Marched Denye II -Duy Wh S S 1430 - $\overline{\mathcal{N}}$

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