

September 6, 2023

Dustin Czapla
Colorado Division of Reclamation, Mining and Safety
1313 Sherman Street, Room 215
Denver, CO 80203
303-866-3567

Delivered Via Email and CDRMS ePermitting

RE: Colorado Stone Quarries, Inc., Pride of America Mine, M-1999-058, Technical Revision 11

Mr. Czapla:

On behalf of Colorado Stone Quarries, Inc. ("CSQ") and the Pride of America Mine ("PAM"), please allow this letter to serve as a request for revision of their 112c Reclamation Permit as Technical Revision 11:

1. Formally address that multiple water monitoring wells are no longer functioning, are damaged, and may be removed permanently from CSQ's water quality sampling program.
2. Address opening of Portal 9 and the Adams gallery.
3. Formally change the PAM's final reclamation plan in alignment with changes required the site's USACE permit ID SPK# 2019008899.
4. Request permission for the 1,000-gallon gasoline tank with integral dike secondary containment be located atop the main fueling area HTPE containment liner versus within the block footprint of the liner structure.
5. Change the PAM's DRMS anniversary date to December 1 for purposes such as the annual report submittal.

Please refer to the following attachments and designated name in quotations in support of this technical revision ("TR") submittal:

- Yule Quarry Groundwater Well Location Map Vr 2 210512 – final.pdf – "groundwater well map"
- Adams opening mock up(reduced).pdf – "preliminary Adams opening image"
- CSQ PAM Rec Plan revision 230901.pdf – "September 2023 Reclamation Plan map"

Monitoring Well Removal

Since their construction in 2020 and 2021, multiple wells included in the PAM's March 12, 2020 dated *Groundwater Sampling and Analysis Plan* submitted to the Division as TR-07 dated July 31, 2020 are now broken or otherwise non-functioning. Please refer to the groundwater well map for locations. Wells and their damages are outlined as:

- Sump well – undamaged; sampleable when liquid water is present
- MW 1 – compromised at 28’ depth; last sampled 11/18/20
- MW 2 – damaged at unknown depth; no measurable water to sample
- MW 3 – undamaged; sampleable when liquid water is present
- MW 4 – undamaged; sampleable when liquid water is present
- MW 5 – compromised at 16’ depth; last sampled 7/28/21

Various emailed correspondence and phone discussions between CSQ, Lewicki, and Division staff have outlined which wells are no longer functioning. While all wells will continue to be included in the PAM’s annual report submittal for site surface and groundwater monitoring, CSQ is requesting that wells MW 1, MW 2, and MW 5 be removed from further consideration permanently. This will allow CSQ to complete continued site development as already confirmed via emailed discussion between ourselves and further detailed in other sections of this TR submittal.

Portal 9 and Adams Gallery Opening

CSQ plans to begin opening a new portal and gallery in the spring of 2024. Site development safety tasks such as scaling and overhead tree removal have already begun. This new portal will be the 9th on the site and will be dubbed “Portal 9” and will be the first opening into the Adams Gallery. The opening will be located between 9200’ and 9300’ elevation and will continue to mine Yule Marble to the west and down with respect to the surface opening.

As initial cutting will occur in spring 2024, final locations and alignments are still in development. Current plans include the Adams Gallery located adjacent to the main fueling bunker and below the Washington and Lincoln Galleries in elevation. The 2024 DRMS annual report submittal will include updated drone topography that includes the opening of Portal 9. Please allow the preliminary Adams opening image to provide an example of where the new Portal 9 will be located. Once final locations and drone topography are collected, CSQ will submit an updated Mine Development Map to the Division that includes the Portal 9 location.

Final Reclamation Plan Updates re USACE Permit

As part of the USACE permit (SPK# 201900889), CSQ was required to make alterations of their currently on file reclamation plan. These changes include the permanent relocation of Yule Creek to its eastern alignment and reclamation of the western main haul road as part of the greater Franklin Waste Rock Landform (“WRL”). While final reclamation is not planned for >75 years, CSQ prefers for all final plans to be current with respect to the Division.

The September 2023 Reclamation Plan map details final site geometries once all mining is completed, the site access and haul road is reclaimed as part of the WRL, and the Gunnison County trail remains (shown as orange outline west of the WRL). All geotechnical stability components of the WRL construction and final reclamation seeding plans remain unchanged. Please refer to the 112c narrative and other technical revisions in CSQ’s permit file for the full reclamation plan.

As CSQ uses a phased bond approach and this final reclamation plan requires many years of continued site development, no changes to the bond are anticipated at this time.

Gasoline Tank Location Change

TR-06 approved by the Division on March 25, 2020 details relocation of the main fueling area and inclusion of an HTPE liner beneath all permanent fuel tanks. Since its installation in November 2019, the HTPE liner has served as a very competent secondary, and in some cases tertiary, form of containment for permanent fuel tanks at the PAM. However, annual melt of winter precipitation caused a series of various obstacles that CSQ must mitigate. For example, the abundance of liquid water present in the tanks and its required disposal as detailed in TR-09 approved by the Division on June 28, 2022.

While the procedure approved in TR-09 is working well, the smallest tank within the HTPE liner containment – a 1,000-gallon gasoline tank – annually begins to float within the liner. This tank includes an integral dike style of secondary containment thus making the HTPE liner tertiary containment. Gasoline is used solely to operate surface only vehicles and is rarely filled to full capacity and is often fuller of air than liquid gasoline. As the tank floats within the liner, it has the ability to turn and rotate with risk of its sharp edges snagging on and ripping this liner. One of CSQ's highest priorities at the PAM is maintaining the functioning integrity of the HTPE liner.

To mitigate potential damages to the HTPE liner and considering the 1,000-gallon gasoline tank already has its own secondary containment, CSQ is requesting permission to remove the gasoline tank from within the marble block outlined HTPE liner to instead rest atop of the fueling bunker perimeter marble blocks that the HTPE liner is anchored to. As the gasoline tank holds a minimal amount of fuel and includes its own secondary containment, CSQ is extremely confident that threats associated with this tank being outside of the HTPE liner are already mitigated. Additionally, the threat of a tear to the liner has a greater potential to compromise the main site fuel and generator system containment and provides more a hazard than the gasoline tank being located outside of the liner's protection.

Change of DRMS Anniversary Date

CSQ's current anniversary date is August 20 which falls just prior to the annual drone flight conducted for the site to gain accurate topography for mapping purposes. While the 5-year report period is in place for the site's USACE permit, the drone flight must be completed as close as possible to the October 1 USACE annual report date and occurs in late August/early September each year.

Therefore, CSQ is requesting that their anniversary date be moved to December 1 such that required map submittals can include drone gathered topography that is a few months old versus topography that, in recent years, has been closer to 11-months old.

Please do not hesitate to contact me with questions and we look forward to receiving your review.

Cheers,



Katie Todt

Geologist and Senior Consultant
Lewicki & Associates, PLLC
(303) 346-5196
katie@lewicki.biz

Enclosures:

- Yule Quarry Groundwater Well Location Map Vr 2 210512 – final.pdf
- Adams opening mock up(reduced).pdf
- CSQ PAM Rec Plan revision 230901.pdf

Ec:

Giuseppe Telara, CSQ
Daniel Penfield, CSQ
Matthew Hoyt, Gunnison County
Donita Bishop, Gunnison County
Martin Schmidt, Gunnison County