



COLORADO
Division of Reclamation,
Mining and Safety
Department of Natural Resources

October 13, 2023

Wyatt Webster
Holcim-WCR, Inc.
1687 Cole Blvd, Suite 300
Golden, CO 80401

Re: Adequacy Review, Technical Revision 3 (TR3), Tucson South Resource, Permit No. M-2004-044

Dear Mr. Webster,

On October 4, 2023, the Division received the request for a Technical Revision (TR3) for the Tucson South Resource, Permit No. M-2004-044, proposing to update the groundwater monitoring plan to remove monitoring wells 1-5 and 11 from future monitoring. During the review of the material submitted, the Division determined that the following items need to be adequately addressed before TR3 can be considered for approval.

1. What is the plan for monitoring wells 1-5 if this revision is approved? Will these five wells be abandoned? If so, what is the schedule for this activity?
2. Assuming the wells are going to be abandoned, please commit to submitting to the Division copies of the relevant DWR abandonment forms along with a Monitoring Well Abandonment Summary that briefly describes the scope of the project, date(s) of completion, and who completed the work.
3. If Holcim is not planning to abandon these wells, please explain why.

This concludes the Division's adequacy review of TR3. Please be advised TR3 may be deemed inadequate, and the request may be denied on **November 3, 2023**, unless the above-mentioned adequacy review items are addressed to the satisfaction of the Division. If more time is needed to respond, the Division can grant an extension of the decision date following a request to do so by the Operator.

Sincerely,

Nikie Gagnon

Nikie Gagnon
Environmental Protection Specialist

CC: Amy Eschberger, DRMS



