

October 26, 2023

Emily Schallenkamp Brannan Sand and Gravel Company, LLC 2500 East Brannan Way Denver, CO 80229

Re: Additional Information Required, 3rd Quarter 2023 Groundwater Level Monitoring; Pit 29, Permit No. M-1980-183

Dear Ms. Shallenkamp:

On October 16, 2023, the Division of Reclamation Mining and Safety (Division/DRMS) received your 3rd Quarter 2023 groundwater level monitoring data. After a review of the submission the Division requests the following information.

- 1. Groundwater levels reported at MW-1 show an upward trend since the repair of the slurry wall in 2018. Prior to the slurry wall repair (2005-2018), the yearly average depth to groundwater was 21.59 feet. Since the repair (2019-2023), the yearly average depth to groundwater is 16.16 feet. In September 2023, the shallowest depth to water on record was measured at 14.45 feet at MW-1. Despite seasonal fluctuations in groundwater level at MW-1, there appears to be an overall increasing trend in groundwater elevations. The Division believes this increasing trend is due to groundwater mounding against the slurry wall on the east side permit boundary. Pursuant to Rule 3.1.6, an Operator is required to minimize disturbances of the hydrologic balance both during and after mining and during reclamation. Please provide a detailed discussion of why there was an abrupt rise in groundwater elevations following the slurry wall repair and why the groundwater level is currently five feet above the historic monitoring levels reported at MW-1.
- 2. Please provide a groundwater model, mounding and shadowing analysis, for this site and submit the report to the Division in a Technical Revision for review.

Please respond to these issues within 30 days of the date of this letter, November 25, 2023. The Division reserves the right to further supplement this document with additional items and details as necessary. If you need additional information or have any questions, please contact me at the address below or by telephone at 303-866-3567 x 8126, or by email at <u>nikie.gagnon@state.co.us</u>.

Sincerely,

Nikie Gagnon

Nikie Gagnon Environmental Protection Specialist

ec: Amy Eschberger, DRMS Patrick Lennberg, DRMS Fred Marvel, Brannon Sand and Gravel

