



COLORADO

Division of Reclamation,
Mining and Safety

Department of Natural Resources

1313 Sherman St. Room 215
Denver, CO 80203

November 7, 2023

Neil Whitmer
Holcim-WCR, Inc
1687 Cole Blvd, STE 300
Golden CO 80401

RE: DRMS Permit M1973-021; Morrison Quarry; Technical Revision 9 (TR9) –
Adequacy Review Letter 1

Mr. Whitmer:

The Division of Reclamation, Mining and Safety received Technical Revision 9 (TR9) for the above listed permit on October 31, 2023. The decision date for this revision has been set for November 30, 2023. DRMS has completed the initial adequacy review of TR9, and as with most revisions, there are several items that will require clarification of the existing information or submittal of additional information.

Review of the Geotechnical Stability Exhibit and the Final Phase III Drainage Report provided is still underway. If additional information is required for those items you will be notified in subsequent Adequacy Review Letter(s) for this TR.

Please be advised that if you are unable to satisfactorily address any concerns identified in this review before the current decision date of November 30, 2023, it will be your responsibility to request an extension of the review period. If there are outstanding issues that have not been adequately addressed prior to the end of the review period, and no extension has been requested, the Division must deny this revision.

The TR as submitted proposes modifications to the current approved mining and reclamation plans and associated reclamation bond amount as summarized below.

- 1) Update the mining and reclamation plan to allow additional mining, and subsequent groundwater exposure, in an area of the South Quarry identified as the Satellite South Pit. Mining would take place below the existing elevation of the pit floor at 6600' ASL to a depth of 6480' ASL as proposed in the TR9 submittal.



- 2) Revise the Surface and Stormwater Drainage Plan for the South Quarry by installing a drainage diversion channel at elevation 7110' across South Quarry face as proposed in the TR9 submittal.
- 3) Removal of requirement for monthly groundwater level monitoring, and approve abandonment of existing monitoring wells MW-2019-01, MW-2019-02 and MW-2019-03 in the South Quarry area.
- 4) Remove the AM07 requirement for a subsurface drain design for the South Quarry from the approved reclamation plan. TR9 proposes backfill of the Satellite South Pit and the South Quarry pit floor to the current elevation of 6600' and grading to provide positive surface drainage to existing discharge point Outfall 003.

Please provide the requested information for the following items:

Exposure of, and any consumptive use of, groundwater in the proposed Satellite South Pit is contingent on SEO issuance of a well permit and substitute water supply plan for the proposed activity. Have these permits been applied for at this time, and if so, have they been issued by SEO? If the permits are not yet issued, is there an estimated timeframe for approval/issuance?

TR9 states that a permanent augmentation plan is being pursued for the anticipated groundwater exposure in the Satellite South Pit area. Has this augmentation plan been filed in water court yet? If not, what is the anticipated filing time frame? What permanent exposed surface area and capacity are being pursued through this augmentation plan and whose water rights will be utilized for this proposed plan?

Continued groundwater level monitoring will be required until a well permit and substitute water supply plan have been issued for the site. Existing groundwater monitoring wells may not be abandoned without alternate approved provisions for monitoring, should it be required, until either the permanent augmentation plan has been approved, or mining has progressed beyond the depth of the existing wells.

Please update the provided Mining Plan and Mining Plan map for TR9 to include/show the following items at a minimum:

- a. Location(s) and volume(s) of the proposed approx. 1.3 Mcy of material that will need to be mined as backfill material for the Satellite South Pit. How will the mining plan be modified and monitored to insure that this material remains on-site for use as backfill?
- b. Location and volumes of the proposed approx. 1.3 Mcy of existing on-site material that will be stored on site for use as backfill for the Satellite South Pit.

As you are aware, DRMS will be required to bond to backfill any areas of exposed groundwater until an appropriate permanent augmentation plan is approved. For the proposed Satellite South Pit, this will result in a substantial bond increase, and as such

DRMS will require significant additional supporting information for the reclamation cost estimates provided in TR9.

- a. Please provide as much supporting information as possible to support the Unit Prices provided for the drill and blasting task as well as the compaction testing task.
- b. Please provide as much supporting information as possible to support the Unit Price provided for the Dewatering task (estimated volume, pumping equipment needed, duration of pumping, anticipated pumping rate, etc).
- c. Please provide a unit cost for processing the material blasted/mined as backfill to meet the size requirements outlined in TR9 (max rock size limited to 2/3 the proposed lift thickness of 30 inches.)

This letter shall not be construed to mean that there are no other technical issues in the submittal. Other issues may arise during the review process, or as additional information is supplied.

If you have any questions, please contact me at (303) 229-9414.

Sincerely,

A handwritten signature in blue ink, appearing to read "Eric Scott".

Eric Scott
Environmental Protection Specialist

CC: Kate Garufi, HDR Engineering, Inc. via email