

December 15, 2023

Melanie Asquith
The City of Lafayette
1290 South Public Road
Lafayette, CO 80026

**RE: Adequacy Review No. 2; Technical Revision (TR-2) – Update to Groundwater Model;
Goose Haven Reservoir #2 – Complex Expansion, Permit No. M-2010-071**

Dear Ms. Asquith,

On December 8, 2023, the Division of Reclamation, Mining and Safety (Division/DRMS) received your responses to the Division's Adequacy Review No.1, dated October 25, for Technical Revision (TR-2) at the Goose Haven Reservoir #2 – Complex Expansion, Permit No. M-2010-071. Please be advised that on December 29, 2023, the application for TR-2 may be deemed inadequate and denied unless the following clarification(s) or items are addressed to the Division's satisfaction.

1. In Exhibit G, Step 3 – Mitigation Triggers, the proposed 45 day time frame to collect a second water level measurement it too long. If the initial water level measurement exceeds both the predicted rise and the corresponding seasonal rise the Operator shall begin collecting water level measurements every 15 days until groundwater falls below the mitigation trigger level. Additionally, the Operator shall notify the Division immediately if a groundwater level measurement exceeds a trigger level.

It is the responsibility of the Operator to minimize impacts to the hydrologic balance, pursuant to Rule 3.1.6, and report any exceedances or complaints to the Division. It is the responsibility of the Division to determine whether or not mitigation measures need to be implemented regardless if an impact is imminent or not.

Section 3 needs to be updated according to the comments above and "impact is imminent" has to be removed.

2. In Exhibit G, Step 3A – Mitigation Triggers Cell 2A, the P-13 reclamation water level is incorrect and needs to be corrected.



3. In Exhibit G, Step 4 – Mitigation Alternatives, as mentioned in item #1 above it is the Operators responsibility to minimize impacts to the hydrologic balance pursuant to Rule 3.1.6. The first paragraph needs to be revised to indicate that if monitoring data shows that groundwater level(s) exceed a mitigation trigger levels the Operator will notify the Division immediately and begin discussions of possible mitigation alternatives as needed. The inset numbered items can be eliminated or revised as needed.
4. In Exhibit G, Step 4A – Mitigation Cell 2 include A, the 3rd to last paragraph, the length of the underdrain needs to be corrected.

This concludes the Division's adequacy review no. 2 of TR-2. The Division reserves the right to further supplement this document with additional adequacy items and/or details as necessary.

The decision date for your application is set for **December 29, 2023**. If additional time is needed to respond, an extension request must be received by our Office by the decision date. If on the decision date, outstanding adequacy items remain, and no extension request has been received, your revision may be denied and the file terminated.

If you need additional information or have any questions, please contact me by telephone at **303-866-3567 x8114**, or by email at patrick.lennberg@state.co.us.

Sincerely,



Patrick Lennberg
Environmental Protection Specialist

cc: Jared Ebert; DRMS

ec: Melanie Asquith, The City of Lafayette, melanie.asquith@lafayetteco.gov
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