



COLORADO

Division of Reclamation,
Mining and Safety

Department of Natural Resources

February 6, 2024

Phillip Courtney
Front Range Aggregates
Martin Marietta West Division
1910 Rand Avenue
Colorado Springs, CO 80905

Re: Permit No. M-1997-054, Parkdale Quarry, Technical Revision (TR-8), Surface and Groundwater Monitoring

Mr. Courtney,

On January 26, 2024, the Division of Reclamation, Mining and Safety (Division) received your Technical Revision (TR8) to revise requirements of the currently approved surface and groundwater monitoring program at the Parkdale Quarry. The Decision date for this revision has been set for February 26, 2024.

The Division completed the initial adequacy review of TR8 and has the following questions and comments. Please acknowledge or provide response as appropriate.

1. Front Range states that as of the date of the submittal, mining has not commenced in the expanded permit area. Please inform the Division of the anticipated start date. Additionally, please commit to notifying the Division prior to initiating mining in the expansion area.
2. TR-8 Items #1 and #2. As summarized in Table 8 in the approved Groundwater Monitoring and Mitigation Plan, the monitoring network consists of four surface water stations located on Current Creek and Tallahassee Creek. Two of the locations are upgradient (CC-1 and TC-1) which provide background data for the expansion area and two are Point of Compliance locations (CC-2 and TC-2). Based on the indicators for mitigation listed in Table 10 of the Groundwater Monitoring and Mitigation Plan, TC-1 and CC-1 are necessary for comparison to the Points of Compliance samples and therefore background sampling should not be completely eliminated. However, the Division will approve a reduced semi-annual monitoring schedule at these four surface water locations. Samples should be taken during high and low flow, spaced approximately 5-6 months apart.

Additionally, the approved groundwater monitoring network consists of three wells MW-1, MW-3, and MW-10. Sampling at these three wells will also be reduced to semi-annually. This data will provide the minimum required to establish groundwater flow direction and site-specific temporal variability. The ongoing semi-annual monitoring of surface and groundwater prior to mining will be considered baseline data and will be used to assess the impacts of the future mining operation. Additional wells will be installed prior to ground disturbing activities in each phase of the expansion area per the approved plan.



3. TR-8 Item #3. Front Range states that during the 6 quarters of background sampling, no flow was observed in Tallahassee Creek at monitoring locations TC-1 and TC2. Please provide an explanation, if possible, why there is flow in the upstream Current Creek but not Tallahassee Creek. In the future, if no flow is observed in Tallahassee Creek during a scheduled sampling event, please note this in the monitoring report but continue to monitor and sample the creek according to the approved schedule when possible.
4. TR-8 Item #4. The Division agrees to revise the semi-annual sampling plan to exclude radionuclides (gross alpha, gross beta, and total radium) from the list of monitoring parameters. Front Range will continue to sample for all other parameters listed in Table 9 of the approved Groundwater Monitoring and Mitigation Plan. The need for site-specific numeric protection levels (NPLs) for exceedances of the standards listed in Regulation 41 identified in the baseline data will be evaluated prior to mining in the expanded area and based on the additional data available at that time.
5. The Division accepts the proposed change in reporting of the semi-annual compliance monitoring to once per year with the submittal of the annual report due on January 11 each year. Additionally, per the 2023 DRMS Groundwater Monitoring Sampling and Analysis Plan Guidance, all future annual monitoring reports should include a map of the monitoring locations at an appropriate scale.

Please be advised that if you are unable to satisfactorily address any concerns identified in this review before the decision date (February 26, 2024), 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.

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.

Sincerely,



Timothy A. Cazier, P.E.
Environmental Protection Specialist

ec: Eric Scott, DRMS
Nikie Gagnon, DRMS
Hunter Ridley, DRMS
DRMS file