

February 16, 2024

Mr. Greg Bridge  
CEMEX, Inc.  
P.O. Box 529  
Lyons, CO 80540

**RE: Adequacy Review No. 2; Reclamation Cost Estimate;  
Lyons Quarry, Permit No. M-1977-208**

Dear Mr. Bridge,

On August 15, 2023, the Division of Reclamation, Mining and Safety (Division/DRMS) received your response to the Division's Preliminary Adequacy Review letter dated May 2, 2023 to provide an updated Reclamation Cost Estimate for the Lyons Quarry, Permit No. M-1977-208. The Division has reviewed the responses and cost estimate and has additional adequacy items that need to be addressed or further clarified before the Division can complete its Reclamation Cost Estimate for the site. Please respond to the following adequacy items with a letter summarizing each response, to the numbered items below, in a cover letter titled "Adequacy Review No. 2 Response Reclamation Cost Estimate, Lyons Quarry M-1977-208".

1. The reclamation cost estimate shall be sufficient to assure the completion of reclamation of affected lands in a forfeiture situation. In this situation it cannot be assumed that all hazardous waste will be properly disposed before forfeiture. Please provide the maximum quantities of waste (specify wet and dry) that are accumulated during a 90-day period, typical disposal location and costs associated disposal. These items will be used for the Division's cost estimate calculations.
2. During the reclamation cost estimate in 2003 the Operator provided, in a letter dated April 22, 2003, an itemized list of hazardous chemicals stored at the site. Please provide an updated list of chemicals along with the needed information for a cost estimate for disposal, similar to item 1 above.
3. What is the estimated volume of material to be removed for the stormwater diversion ditch
4. There is a conveyor belt system located within the Lyons Quarry permit boundary that leads to the Dowe Flats permit. Please clarify if this system will be removed during the reclamation of Dowe Flats or the quarry permit. If the quarry permit please specify removal costs?



5. There is a railroad spur line that enters the site from the north and leads to the Clinker Storage Building. Please provide a cost estimate for removal of the spur line.
6. Please provide a cost estimate for plugging and abandoning all site monitoring wells on a per well basis.
7. The indirect costs associated with the Division's cost estimate do not account for specialized QA/QC of the GCL installation. Please provide cost estimate or percentage of quoted cost for QA/QC activities?
8. Please clarify the following statement made in response item #8 *However, it was determined that this approach was not feasible* when referring to the source of backfill for C-Pit. Why was is determined to be not feasible?
9. The C-Pit volume estimation needs additional clarification. In response item #8 it is stated the volume needed to fill C-Pit is 200,963 CY. In response item #11 the estimated volume needed is 217,742 CY (265,819 CY - 48,077 CY), although 200,963 CY appears to have been incorrectly stated. In Table 7 Backfilling and Capping the volume quoted for backfilling is 205,158 CY. Please clearly state the volume needed to backfill C-Pit and provide the calculations used to arrive at the volume.
10. In response item #8 the quoted volume for clean soil material required for protecting the clay liner, interstitial fill, and cover for the disposal cell is 108, 000 CY. In Table 6 On-Site Concrete Disposal Cell the volume totals given sum to 109,000 CY. Please clarify the discrepancy.

This concludes the Division's Adequacy Review No. 2 of your submittal. The Division reserves the right to further supplement this document with additional adequacy items and/or details as necessary.

The decision date for your response is set for **March 18, 2024**.

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](mailto:patrick.lennberg@state.co.us).

Sincerely,



Patrick Lennberg  
Environmental Protection Specialist

cc: Jared Ebert, DRMS

ec: Greg Bridge, CEMEX, Inc., [gregm.bridge@cemex.com](mailto:gregm.bridge@cemex.com)  
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