



February 21, 2024

Mr. Tim Cazier
Division of Reclamation, Mining and Safety
1313 Sherman Street, Room 215
Denver, CO 80203

By electronic mail

RE: Parkdale Quarry, M-1997-054, Technical Revision (TR-8), Surface and Groundwater Monitoring Response to Adequacy Review

Dear Mr. Cazier,

Front Range Aggregates LLC, ("Front Range") submits this response to the adequacy review of the captioned Technical Revision (TR-8) for permit M-1997-054. Responses are in order of the Division's comments in the adequacy letter of February 6, 2024.

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.

Response: Front Range does not have a definite start date for mining in the expanded permit area. It is anticipated to be at least two years, and possibly longer, before mining commences in the expanded area. Front Range commits to notifying the Division once a definite start date is known. For this reason, Front Range repeats its original request to pause all monitoring until a definite start date is determined. Front Range will commit to resuming the sampling program prior to initiating mining in the expansion area, upon notification to the Division.

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

West Division

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mining operation. Additional wells will be installed prior to ground disturbing activities in each phase of the expansion area per the approved plan.

Response: Per the response to item 1 above, Front Range requests a pause in all monitoring until a definite start date for mining in the expansion area is determined. The six quarters of data submitted exceed the monitoring and mitigation plan requirements (and the Division's guidance) for baseline data, which requires at least five consecutive quarters of data. Front Range will commit to resuming the sampling program upon notification to the Division, and acknowledges that at that time, each location will be observed and sampled semi-annually. Front Range also acknowledges that additional wells may be installed prior to ground disturbing activities in each phase per the approved plan unless a revision is approved by the Division.

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.

Response: Front Range does not have an explanation why there is flow in Current Creek but not Tallahassee Creek. We expect that regional conditions contribute to the observations we have reported from the background sampling program.

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.

Response: Front Range acknowledges and appreciates the exclusion of radionuclides from the list of monitoring parameters. If our request to pause sampling until mining begins in the expansion area in (Response #1) is not granted, we still do not understand the need to continue monitoring for parameters that were not detected during the 6 quarters of background samples while the expanded area continues to be undisturbed, and therefore request a reduced list of parameters, as shown in our original TR request, until mining in the expansion area commences. Front Range will revisit permanently removing parameters through a separate technical revision after additional data from the semi-annual monitoring program is collected once mining in the expanded area commences.

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

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Guidance, all future annual monitoring reports should include a map of the monitoring locations at an appropriate scale.

Response: Acknowledged.

Should you have additional questions please contact me at 720-612-6232 or phillip.courtney@martinmarietta.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Phillip J. Courtney". The signature is fluid and cursive, with the first name "Phillip" being more prominent and the last name "Courtney" following in a similar style.

Phillip J. Courtney
Land Manager

STATE OF
COLORADO

Cazier - DNR, Tim <tim.cazier@state.co.us>

RE: M-1997-054/Parkdale QuarryTR-8 Adequacy Review

1 message

Phillip Courtney <Phillip.Courtney@martinmarietta.com>

Thu, Feb 22, 2024 at 10:04 AM

To: "Cazier - DNR, Tim" <tim.cazier@state.co.us>

Cc: Hunter Ridley - DNR <hunter.ridley@state.co.us>, Nikie Gagnon - DNR <nikie.gagnon@state.co.us>, Eric Scott <eric.scott@state.co.us>, Julie Mikulas <Julie.Mikulas@martinmarietta.com>

Let's try this again and see if that attachment is there.

Regards, Phil

From: Phillip Courtney**Sent:** Wednesday, February 21, 2024 2:36 PM**To:** 'Cazier - DNR, Tim' <tim.cazier@state.co.us>**Cc:** Hunter Ridley - DNR <hunter.ridley@state.co.us>; Nikie Gagnon - DNR <nikie.gagnon@state.co.us>; Eric Scott <eric.scott@state.co.us>; Julie Mikulas (Julie.Mikulas@martinmarietta.com) <Julie.Mikulas@martinmarietta.com>**Subject:** RE: M-1997-054/Parkdale QuarryTR-8 Adequacy Review

Tim,

Please see our response to the adequacy review letter for TR-8. Glad to discuss any additional questions.

Regards, Phil

Phillip Courtney

Land Manager | West Division

Martin Marietta

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From: Cazier - DNR, Tim <tim.cazier@state.co.us>**Sent:** Tuesday, February 6, 2024 12:12 PM

To: Phillip Courtney <Phillip.Courtney@martinmarietta.com>
Cc: Hunter Ridley - DNR <hunter.ridley@state.co.us>; Nikie Gagnon - DNR <nikie.gagnon@state.co.us>; Eric Scott <eric.scott@state.co.us>
Subject: M-1997-054/Parkdale QuarryTR-8 Adequacy Review

EXTERNAL SENDER – PLEASE ASSESS AND VERIFY

Phil,

Attached for your records is a copy of the Division's preliminary adequacy review letter for TR-8. Please contact me or any of the others copied on this email if you have any questions or concerns.

Tim Cazier, P.E. (he / him)

Environmental Protection Specialist III - Engineering

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