



**COLORADO**  
Division of Reclamation,  
Mining and Safety  
Department of Natural Resources

February 26, 2024

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

**Re: Permit M1997-054, Parkdale Quarry, Technical Revision (TR8), Surface and Groundwater Monitoring, 2nd Adequacy Review**

Mr. Courtney,

The Division of Reclamation, Mining and Safety (Division) reviewed your response dated February 21, 2024, to the preliminary adequacy review letter for Technical Revision (TR8) and submits the following comments. The Division is required to issue a decision for this revision no later than March 1, 2024, therefore a response to the following adequacy review concerns should be submitted to the Division as soon as possible.

The Division completed a review of the response and has the following questions and comments.

1. Adequacy Response #1. The response is adequate.
2. Adequacy Response #2 TR-8 Items #1 and #2. The Division acknowledges that the anticipated start date for mining in the expanded permit area could be at least two years or possibly longer. However, the Division will not accept ceasing all monitoring until a date for mining in the expansion area is determined. Five consecutive quarters of sampling data is the *minimum* duration for baseline groundwater characterization in an active permitted area. Therefore, as stated in the first adequacy review letter, the Division will approve a reduced semi-annual monitoring schedule at the four surface water locations and the three groundwater wells. Samples should be taken during high and low flow, spaced approximately 5-6 months apart. Once a start date for ground disturbance in the expanded area is determined, Front Range shall resume quarterly sampling at least two quarters prior to the initiation of mining and continue quarterly sampling through the life of the mine unless/until subsequent reductions are proposed and justified in a future TR submittal. Please acknowledge.
3. Adequacy Response #3 TR-8 Item #3. The response is adequate. Please note, as stated in the first adequacy letter, in the future, if no flow is observed in Tallahassee Creek during a scheduled semi-annual sampling event, note this in the monitoring report but continue to monitor and sample the creek when possible.





4. Adequacy Response #4 TR-8 Item #4. The Division will not approve further reduction of the analyte list at this time, beyond the previously stated exclusion of radionuclides (gross alpha, gross beta, and total radium). Non-detects are still valid and useful data. Please acknowledge.
5. Adequacy Response #5. The response is adequate.

Please be advised that if you are unable to satisfactorily address any concerns identified in this review before the decision date, 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