



STATE OF
COLORADO

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Quarterly Hydrology Reports for Q2-Q4 2023 Adequacy Review

1 message

Carter - DNR, Jocelyn <jocelyn.carter@state.co.us>

Wed, Feb 28, 2024 at 5:09 PM

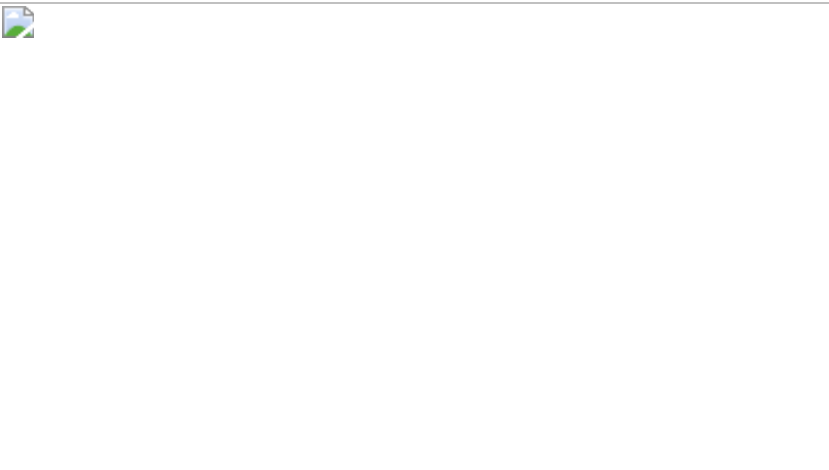
To: Amy Rodrigues <aveek@gcc.com>

Cc: "Ebert - DNR, Jared" <jared.ebert@state.co.us>, "Lennberg - DNR, Patrick" <patrick.lennberg@state.co.us>

Hi Amy,

Please see the attached adequacy report for the second, third, and fourth quarterly hydrology reports submitted to the Division.

Thank you,
Jocelyn



GCC_QuarterlyHydroReport_AdequacyReviewLetter_Q2Q3Q4.pdf
259K



February 28, 2024

Amy Veek
GCC Rio Grande, Inc.
3372 Lime Rd
Pueblo, CO 81004

RE: Adequacy Review of Quarterly Hydrology Reports 2023 2nd Quarter, 3rd Quarter, and 4th Quarter; Permit #M-2002-004

Dear Ms. Veek,

The Division of Reclamation, Mining, and Safety (Division/DRMS) received the Second Quarterly Hydrology report on July 27, 2023, the Third Quarterly Hydrology report on October 20, 2023, and the Fourth Quarterly Hydrology report on January 16, 2024. A review of the results submitted to the Division was completed and the following issues were identified. Please review the issues outlined below and provide a response to the Division.

1. It is stated in TR-11, approved on June 10, 2022, that low-stress sampling methods would be used for sampling at all monitoring wells. According to the U.S. EPA 2015 Ground-Water Sampling Guidelines cited in TR-11, when utilizing the low-stress method, wells should have minimal drawdown and should not exceed 0.33 feet. Using the water levels of each well before and after sampling provided in the field data for each quarterly report, the total drawdown amount was calculated by the Division. In the second quarter, wells MW-6, MW-7, MW-8, MW-9, MW-10, MW-11, MW-12, and MW-14 were drawn down more than 0.33 feet during sampling. In the third quarter, wells MW-7, MW-8, MW-9, MW-10, MW-11, MW-12, MW-13, and MW-14 were drawn down more than 0.33 feet during sampling. In the fourth quarter, wells MW-6, MW-8, MW-9, MW-10, MW-11, MW-12, and MW-14 were drawn down more than 0.33 feet during sampling. Please provide an explanation for why the wells were drawn down more than what is suggested in the U.S. EPA guidelines and how the samples were affected because of the exceeded drawdown.
2. Using the information provided in Table 2 of TR-11 for tubing volume and the flow rates provided in the field data reports, the Division calculated the minimum volume to have been purged after collecting a minimum of three consecutive field parameter measurements following removal of the stagnant tubing water volume. Results show that in the third quarter well MW-14 and in the fourth quarter wells MW-6, MW-7, MW-9, MW-10, and MW-11 were not purged long enough to collect three water parameter measurements prior to collecting a sample. Please provide an explanation of why these



wells were not purged long enough and how this affected the sampling results.

3. The quarterly reports did not include information about any deviations of the sampling process. Going forward, the Division would like a cover letter accompanying the quarterly reports that go over what was done during sampling and any sampling deviations that occurred during the process. Please commit to providing said cover letter providing a narrative of the sampling process during each quarter.

This concludes the Division's review of the second, third, and fourth quarterly reports of 2023. The Division reserves the right to further supplement this document with additional items and/or details necessary.

The due date for your response has been set for *March 29, 2024*.

If you have any questions, please contact me by email at Jocelyn.carter@state.co.us or by phone at (720) 666-1065.

Sincerely,



Jocelyn Carter
Environmental Protection Specialist
Division of Reclamation, Mining, and Safety

Ec: Jared Ebert, DRMS
 Patrick Lennberg, DRMS