



February 29, 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 2nd Adequacy Review

Dear Mr. Cazier,

Front Range Aggregates LLC, ("Front Range") submits this response to the 2nd 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 26, 2024 that require a response.

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.

Response: Front Range acknowledges the sampling frequency that is stated and expects to revisit this in a future TR.

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.

Response: Acknowledged

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.

West Division

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Response: *Front Range acknowledges the Division's response and expects to revisit this in a future TR.*

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