

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

Pueblo Cement and Limestone Quarry M-2002-004 TR13 Adequacy Review

1 message

Carter - DNR, Jocelyn <jocelyn.carter@state.co.us> To: Amy Rodrigues <aveek@gcc.com> Cc: "Ebert - DNR, Jared" <jared.ebert@state.co.us> Tue, Apr 16, 2024 at 11:01 AM

Good morning Amy,

Please see the attached adequacy review for the TR-13 and the recalculated reclamation cost estimate for this permit. Let me know if you have any questions or concerns.

Thank you,

~Jocelyn

Jocelyn Carter Environmental Protection Specialist Division of Reclamation, Mining, and Safety 1313 Sherman St Suite 215 Denver, CO 80203 office: (303) 866-3567 x 8110 cell: (720) 666-1065

20240416_M2002004_TR13_AdequacrReview_CostEst_GWSAP.pdf 1203K



April 16, 2024

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

RE: GCC Rio Grande, Inc., Pueblo Cement Plant and Limestone Quarry, Reclamation Permit No. M-2002-004, Technical Revision 13 (TR-13), Beneficial Use of Coal Reject Material and Update to Financial Warranty Cost Estimate

Dear Ms. Rodrigues,

The Division of Reclamation, Mining, and Safety (DRMS/Division) received the Technical Revision 13 (TR-13) application on March 28, 2024, requesting the beneficial use of coal reject material as backfill and an update to the financial warranty cost estimate. Prior to the Division issuing a decision of the TR-13, please address the following issues to the satisfaction of the Division:

Part 1: Beneficial Use of Coal Reject Material

- 1. The TR-13 application requests the use of coal reject material to be incorporated with backfill material. How was this material handled, stored, and being disposed of currently?
- 2. The TR-13 application states that the coal material is rejected due to metal contamination; what is the nature of the contamination that causes this material to be rejected (and would now be incorporated into the backfill material if this is approved)?
- 3. Results of one composite sample that was tested was provided from a height of 3-4 feet from the ground surface around the current coal reject pile. The Division believes additional samples should be taken from the reject pile to characterize this material. For this TR, please develop a sampling plan that follows an incremental sampling methodology (ISM). The ISM is a structured composite sampling and processing protocol that reduces data variability and provides a reasonably unbiased estimate of mean contaminant concentrations in a volume of medium targeted for sampling. Provide the ISM based sampling plan to the Division for review and approval prior to implementation.
- 4. The sample tests produced results of eight contaminants; the Division believes that additional parameters should be analyzed. After conducting the ISM sampling, SPLP and TCLP testing should be conducted to assess the samples. The TCLP analysis should be



run for the most restrictive standards in Tables 1-4 of Regulation No. 41 – The Basic Standards for Groundwater (Reg. 41). This parameter list is included in Appendix A of the Divisions September 2023 guidance document, "Groundwater Monitoring: Sampling and Analysis Plan Guidance Construction Materials and Hard Rock Sites". This document is included in the attachments.

5. The Division believes samples collected using the developed ISM plan discussed above and the results of the testing of the samples should be completed and analyzed before incorporating any additional or future coal reject as backfilling material. Please develop a sampling, analysis and reporting plan for future coal reject material that will document and ensure future coal reject material will be non-toxic and acid forming. Clearly define what sampling results would deem the coal reject, material as ineligible for backfilling material.

Part 2: Update to Financial Warranty Cost Estimate

6. Please review and comment on the attached reclamation cost estimate calculated based on the proposed changes made to Tasks #1 and #3.

This concludes the Division's preliminary review of the TR-13 submitted. The decision date for TR-13 is April 27, 2024. Please provide the response to the above issues 5 business days prior to this date to allow time for the Division's review. It is your responsibility to submit a written request for an extension to the decision date if more time is needed to adequately addresses the issues above.

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

Sincerely,

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

Ec: Jared Ebert, DRMS Eric Scott, DRMS

Enclosures: Reclamation Cost Estimate Groundwater Monitoring: Sampling and Analysis Plan Guidance Construction Materials and Hard Rock Site, September 2023

COST SUMMARY WORK

Limesto	Cement Plant an ne Quarry	ld Per	mit Action:	2024 TR13	Permit/Jol	o#: <u>M2002004</u>
PROJECT	<u>' IDENTIFICA</u>	TION				
		_	<u>a 1 1</u>		A11 · /·	News
Task #:	000	State:	Colorado		Abbreviation:	None
Task #: Date:	000 4/15/2024	State: County:	Colorado Pueblo		Abbreviation: Filename:	M004-000

TASK LIST (DIRECT COSTS)

Task	Description	Form	Fleet	Task Hours	Cast
001	Convevor Belt Demo	DEMOLISH	1	200.00	\$97.310
001A	Demo and Plug Monitoring Wells	BOREHOLE	1	0.00	\$9,028
002	Grade Highwall to 4:1	DOZER	2	138.79	\$128,773
003	Arroyo Restoration	SCRAPER1	2	431.97	\$1,208,872
004	Arroyo Topsoil Placement	SCRAPER1	3	19.73	\$78,209
005	Rip Haul Roads and Conveyor Area	RIPPER	2	40.05	\$37,526
006	Pit Area Overburned/Topsoil Placement	SCRAPER1	3	21.58	\$85,564
007	Weed Management	REVEGE	1	24.00	\$64,779
008	Revegetation Arroyo 27 ac and Affected Area 71	REVEGE	1	60.00	\$199,957
	ac				
009	Mobilization/Demoblilzation	MOBILIZE	1	9.12	\$43,124
010	Lube Truck	MISCTRUK] 1	100.00	\$9,316
011	Fuel Truck	MISCTRUK] 1	100.00	\$9,316
012	Construction ManagementTruck	MISCTRUK	1	100.00	\$8,863
		<u>SUBTO</u>	TALS:	1245.24	\$1,980,637

INDIRECT COSTS

OVERHEAD AND PROFIT:

Liability insurance:	2.02	Total =	\$40,009
Performance bond:	1.05	Total =	\$20,797
Job superintendent:	622.62	Total =	\$40,520
Profit:	10.00	Total =	\$198,064
		TOTAL O & P =	\$299,389
		CONTRACT AMOUNT (direct + $O \& P$) =	\$2,280,026

LEGAL - ENGINEERING - PROJECT MANAGEMENT:

Financial warranty processing (legal/related costs):	\$500	Total =	\$500
Engineering work and/or contract/bid preparation:	4.25	Total =	\$96,901
Reclamation management and/or administration:	5.00	-	\$114,001
CONTINGENCY:	0.00	Total =	\$0
	TOTAL IN	DIRECT COST =	\$510,792
TOTAL BO	\$2,491,429		

DEMOLITION WORK

Task descri	ption: Conve	yor Belt Demo				
Pueblo Cement Plant and Site: Limestone Quarry		Permit Action:2024	4 TR13	Permi	t/Job#: _	M2002004
PROJECT IDEN	TIFICATION					
Task #: 001 Date: 4/15/20 User: JLC Age	24 Cou	tate: <u>Colorado</u> inty: <u>Pueblo</u> ne: <u>DRMS</u>		Abbreviation: Filename:	None M004	4-001
<u>UNIT COSTS</u>				Location adj	ustment	: 88.00 %
Structure or Iten Description	Dimensions	Demolition Menu Selection	Quantity	Unit U	nit ost	Total Cost
Conveyor Belt	6' x 10' x 4850'	Conveyor, demolition, on-site disposal, existing pit, 10,000 ft. haul	291,000.00	CF \$	0.38	\$110,580.00
Job Hours:	190.00	Subtotal (unadjusted): <u>\$1</u>	10,580.00	Total (adjuste locat	Cost d for ion):	\$97,310.40

BOREHOLE SEALING WORK

,	Task description:	Demo and Plug Monitoring	g Wells		
Site:	Pueblo Cement Plant and Limestone Quarry	d Permit Action:	2024 TR13	Permit/Jo	b#: <u>M2002004</u>
<u>PROJE</u>	CT IDENTIFICATION	[
Task #: Date: User:	001A 4/15/2024 JLC	State:ColoradoCounty:Pueblo		Abbreviation: _ Filename: _	None M004-001A
	Agency or organizati	on name: DRMS			

UNIT COSTS

Borehole Description	Sealing/Item Method	Diameter	Length	Quantity	Unit	Unit	Total Cost
Description		Diameter	Lengen	Quantity	Omt	Cost	
Monitoring Wells	Portland cement grout - 2	2	1565	1,565.00	LF	\$5.27	\$8,248.33
MW-5 thru 24	in. (labor, equip,						
	materials)						
Borehole Markers	Borehole	NA	NA	20.00	EA	\$39.00	\$780.00
	location/identification						
	marker (EA, material						
	cost only)						

Job Hours: 0.00

Total Cost: \$9,028.00

BULLDOZER WORK

Task descriptio							
Pueblo Cem Limestone (ent Pla Juarry	ant and	Per	mit Action:	2024 TR13	Permit/Job#:	M2002004
PROJECT II	DENT	IFICATI	ON				
Task #: 0	02		State:	Colorado		Abbreviation:	None
Date: 4	/15/202	24	County:	Pueblo		Filename:	M004-002
User: J	LC						
Agenc	cy or or	ganization	name: DI	RMS			
HOURLY E	QUIPN	MENT CO	<u>DST</u>				
Basic Machi	ne:	Cat D9T - 9	PSU				
Horsepow	er:	405					
Blade Ty	pe:	Semi-Unive	ersal				
Attachme	ent:	3-shank rip	per				
Shift Ba	sis:	1 per day					
Data Sour	ce:	(CRG)					
Cost Breakdow	<u>n</u> :						
					Utilization %		
Ownership Co	ost/Hou	r:		\$238.76	NA		
Operating Co	ost/Hou	r:		\$162.29	100		
Ripper own. Co	ost/Hou	ır:		\$18.32	NA		
Dinnor on Co	sot/Lon			\$1.10	50		
Ripper op. Co		Ir:		94.4 9	20		
Operator Co Total unit Cost/ Total Fleet Cos	/Hour: t/Hour:	ır:	90 79	\$40.04	NA		
Material Volum Swell facto	St/Hou ost/Hour: t/Hour: t/Hour: t/Hour: t/Hour: t/Hour:	IT: IT: \$463. \$927. NTITIES 07,666 .430	90 79	\$40.04	NA		
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Nipper op. Co Operator Co Total unit Cost/ Total Fleet Cos MATERIAL Initial Volum Swell facto Loose volum Source of estim Source of estim Source of estim HOURLY PH Average push d Unadjusted hou Materials consi Average push g Average site alt Material weight Weight descrip Job Condition O	A contraction of the second se	IT:	90 79 Y <u>HW 7,50</u> <u>Cat Hand</u> <u>120 feet</u> 1,093.1 LC : <u>Rock</u> , y feet <u>lbs/LCY</u> mposed rock	\$40.04 \$40.04 0' long 30' h lbook Y/hr well ripped o 	eight 		
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Visibility:	1.000	(AVG.)
Job efficiency:	0.830	(1 SHIFT/DAY)
Spoil pile:	1.000	(DOZ-OC)
Push gradient:	1.329	(CAT HB)
Altitude:	1.000	(CAT HB)
Material Weight:	0.697	(CAT HB)
Blade type:	1.000	(PAT)
Net correction:	0.5074	
ted unit production: 55	4.64 I CV/br	

Adjusted unit production:	554.64 LCY/hr
Adjusted fleet production:	1109.28 LCY/hr

JOB TIME AND COST

Fleet size:	2 Dozer(s)
Unit cost:	\$0.836/LCY

Total job time:	138.79 Hours
Total job cost:	\$128,773

SCRAPER TEAM WORK

Pu Site: Lin	eblo Cement P mestone Quarr	lant and y	Permit	t Action:	2024 TR13	Perr	nit/Job#: <u>M200</u>	2004
PRO)JECT IDENT	<u>TIFICATION</u>						
Τa	ask #: <u>003</u>		State: 0	Colorado		Abbrev	viation: <u>None</u>	
	Date: $4/15/20$	024 Co	unty: _l	Pueblo		Fil	ename: M004-	003
	Agency or o	organization name	DRM	IS				
HOU	<u>URLY EQUIP</u>	MENT_			COSTSI	hift basis: <u>1 per d</u>	ay	
				Equipme	ent Description			
		-5	Scraper:	Cat 637	/G w/push-pull			
	Suppo	rt Equipment -Loa	-Dozer:	NA NA				
_	5 appo	-Dum	p Area:	NA				
	Road Ma	intenance – Motor	Grader:	CAT 14	4M	1		
		-Water	Truck:	Water	Tanker, 10,000 Ga	ul.		
Cost	Breakdown:	Scraper Wo	rk Team		Support Equip	oment	Maintenance	Equipment
		Scraper	Doz	zer	Load Area	Dump Area	Motor Grader	Water Truck
%Utiliza	ation-machine:	100		NA	NA	NA	50	50
Owners	ship cost/hour:	\$255.23		NA	NA	NA	\$149.33	\$135.9
Operat	ting cost/hour:	\$280.59		NA	NA	NA	\$46.40	\$82.60
%Util	ization-ripper:	NA		NA	NA	NA	0	NA
Ripper o	wn. cost/hour:	NA		NA	NA	NA	\$5.83	\$0.00
Ripper	op. cost/hour:	NA		NA	NA	NA	\$0.00	\$0.00
Opera	ator cost/hour:	\$47.07		NA	NA	NA	\$46.87	\$0.00
	Jnit Subtotals:	\$582.89		NA	NA	NA	\$248.43	\$218.55
Nu	mber of Units:	4	#2.22	0	0	0	1	
Gr	oup Subtotals:	Work:	\$2,33	31.56	Support:	\$0.00	Maint:	\$466.98
Total	work team cost <u>FERIAL QUA</u> Initial volume:	/hour: <u>\$2,798.54</u> ANTITIES 883,710		CCY	Swell fact	tor: 1.125		
	Loose volume:	994,174		LCY				
	Source of	rce of estimated ve of estimated swell	olume:	Table L- Cat Hand	1 AM-01 dbook			
HOU	URLY PRODU	<u>UCTION</u>			C			
					Scraper Bo	owi (volume) Basi	<u>IS:</u>	~~~
							_	
M Mater	laterial weight: ial description:	2,650 lbs/LCY Decomposed roc 75% Earth	k - 25% I	Rock,	Struck Heaped	Volume: <u>24.00</u> Volume: 34.00	L	CY CY

<u>1.00</u> Minutes

0.60 Minutes

Payload Capacity: 30.79 LCY

Cycle Time:

Scraper Loading Time: Maneuver and Spread Time:

Job Condition Correction:

Site Altitude: 5100 feet

	Scraper	Push Dozer	Source
Altitude Adj:	1.000	NA	(CAT HB)
Job Efficiency:	0.830	NA	(CAT HB)
Net Correction:	0.830	NA	

Travel Time:

Road Condition: Hard, smooth, stabilized, surfaced, watered, maintained 2.0

Haul Route:

Seg #	Haul Distance (Ft)	Grade (%)	Roll. Res (%)	Total Res (%)	Velocity (fpm)	Travel Time (min)
1	750.00	4.00	2.00	6.00	1477	0.59

Haul Time: 0.59 minutes

Return Route:

Seg #	Haul Distance (Ft)	Grade (%)	Roll. Res (%)	Total Res (%)	Velocity (fpm)	Travel Time (min)
1	750.00	-4.00	2.00	-2.00	2972	0.32
						·

Return Time: **0.32**

0.32	minutes
2.51	minutes
1,150.76	LCY/Hour
-	

Selected Number of Scrapers:2Scraper(s)Adjusted single scraper team (unit) hourly production:1,150.76LCY/HourAdjusted multiple scraper team (fleet) hourly production:2,301.51LCY/Hour

Total Scraper team cycle time: Adjusted for job conditions:

Unadjusted unit production/hour: <u>1,386.45</u> LCY/Hour Optimal Number of Scrapers per push dozer:

JOB TIME AND COST

Fleet size:	2	Team(s)	Total job time:	431.97	Hours
Unit cost:	\$1.216	/LCY	Total job cost:	\$1,208,872	

SCRAPER TEAM WORK

Pu Site: Li	ueblo Cement Pl mestone Quarry	ant and	Permi	t Action:	2024 TR13	Perr	mit/Job#: <u>M200</u>	2004
PRO	DJECT IDENT	TIFICATION						
Т	ask #: 004		State:	Colorado		Abbrev	viation: None	
	Date: $\frac{4}{15}/20$	<u>24</u> Co	unty:	Pueblo		Fil	ename: M004-	004
	Agency or o	rganization name:	DRM	IS				
HO	URLY EQUIP	MENT_			COSTSI	hift basis: <u>1 per d</u>	ay	
				Equipm	ent Description			
		-5	Scraper:	Cat 63	7G w/push-pull			
			-Dozer:	NA				
	Suppor	rt Equipment -Loa Dum-	d Area:	NA NA				
	Road Mai	ntenance – Motor	Grader:	CAT 1	4M			
		-Water	Truck:	Water '	Tanker, 10,000 Ga	d		
Cost	Breakdown:	Scraper Wo	rk Team		Support Equi	oment	Maintenance	Equipment
005	<u>Dicukuo wii</u> .	Scraper	Do	zer	Load Area	Dump Area	Motor Grader	Water Tr
%Utiliz	ation-machine:	100		NA	NA	NA	50	
Owner	ship cost/hour:	\$255.23		NA	NA	NA	\$149.33	\$13
Opera	ating cost/hour:	\$280.59		NA	NA	NA	\$46.40	\$82
%Uti	lization-ripper:	NA		NA	NA	NA	0	
Ripper of	own. cost/hour:	NA		NA	NA	NA	\$5.83	\$0
Ripper	r op. cost/hour:	NA		NA	NA	NA	\$0.00	\$0
Oper	rator cost/hour:	\$47.07		NA	NA	NA	\$46.87	\$0
	Unit Subtotals:	\$582.89		NA	NA	NA	\$248.43	\$218
Nu	mber of Units:	6		0	0	0	1	
G	roup Subtotals:	Work:	\$3,49	07.34	Support:	\$0.00	Maint:	\$466.98
Tota <u>MA</u>	l work team cost TERIAL QUA Initial volume: Loose volume:	/hour: <u>\$3,964.32</u> .NTITIES 43,560 52,925		CCY LCY	Swell fact	or: <u>1.215</u>		
	Sou	ce of estimated vo	olume:	Table L-	-1 AM-01			
	Source of	of estimated swell	factor:	Cat Han	dbook			
HO	URLY PRODU	UCTION						
					Scraper Bo	owl (volume) Basi	<u>is:</u>	
Ν	Interial weight:	1,600 lbs/LCY			Struck	Volume: 24.00	L	CY
Mater	rial description:	Top Soil			Heaped	Volume: 34.00	L	CY
	Rated Payload:	81,600 pounds			Average	Volume: <u>29.00</u>	L	CY
n							-	/ \ \/

Cycle Time:

Scraper Loading Time: Maneuver and Spread Time:

Job Condition Correction:

Site	Altitude:	5100 feet
~		01001000

	Scraper	Push Dozer	Source
Altitude Adj:	1.000	NA	(CAT HB)
Job Efficiency:	0.830	NA	(CAT HB)
Net Correction:	0.830	NA	

Travel Time:

Road Condition: Hard, smooth, stabilized, surfaced, watered, maintained 2.0

Haul Route:

Seg #	Haul Distance (Ft)	Grade (%)	Roll. Res (%)	Total Res (%)	Velocity (fpm)	Travel Time (min)
1	1500.00	4.00	2.00	6.00	1477	1.07

Haul Time: **1.07** minutes

Return Route:

Seg #	Haul Distance (Ft)	Grade (%)	Roll. Res (%)	Total Res (%)	Velocity (fpm)	Travel Time (min)
1	1500.00	-4.00	2.00	-2.00	2972	0.56

Return Time:	0.56	minutes
Total Scraper team cycle time:	3.23	minutes
Adjusted for job conditions:	894.24	LCY/Hour
Selected Number of Scrapers:	2	Scraper(s)
Adjusted single scraper team (unit) hourly production:	894.24	LCY/Hour
Adjusted multiple scraper team (fleet) hourly production:	2,682.72	LCY/Hour
Unadjusted unit production/hour: <u>1,077.40</u> LCY/Hour Optimal Number of Scrapers per push dozer:		

JOB TIME AND COST

Fleet size:	3	Team(s)	Total job time:	19.73	Hours
Unit cost:	\$1.478	/LCY	Total job cost:	\$78,209	

<u>1.00</u> Minutes

<u>0.60</u> Minutes

BULLDOZER RIPPING WORK

	Task description:	Rip H	aul Roads	and Convey	or Area					
Site	Pueblo Cement Limestone Quar	Plant and rry	Peri	nit Action:	2024 TR13	Per	rmit/Job#:	M2002004	4	
	PROJECT IDEN	NTIFICATIO	N							
	Task #: 005 Date: 4/15/ User: JLC	2024	State: County:	Colorado Pueblo		Abbro	eviation: _ ilename: _	None M004-005		
	Agency of	r organization n	ame: DR	RMS						
	HOURLY EQU	IPMENT CO	ST							
	Basic M	achine: Cat I				Horsepower:	4	05		
	Ripper Attac	hment: 3-Sh	ank Ripper			Shift Basis:	1 pe	er day		
						Data Source:	(C	RG)	_	
	Cost Breakdown:				l.					
		Ownership Cos	t/Hour:		\$238.76	NA				
		Operating Cos	t/Hour:		\$162.29	100				
	Ripper	Ownership Cos	t/Hour:		\$18.32	NA				
	Ripper	r Operating Cos	t/Hour:		\$8.98 \$40.04	100 NA				
		Total Unit Cos	t/Hour:		\$468.39					
		Total Fleet Cos	t/Hour	\$03	5 77					
			<u> </u>	ψυσ	,,,,					
	MATERIAL QU	<u>ANIIIES</u>		Sele	ected estimating	method: Area				
	Alternate Methods:									
Seismic:	NA		Ban	k Volume:	NA	BCY	<u> </u>	NA		
Area:	58.60	acres	Rip I	Jepth (ft):	1.00	Volume: 94	4,541	I	3CY or CCY	
	:	Source of estimation	ated quantit	y: Operat	or Supplied Map	from Inspection				
	HOURLY PRO	DUCTION								
	Seismic:									
		Se	eismic Velo	city:	NA	feet/seco	nd			
	Area:									
		Average	Ripping De	epth:	2.63	feet/pass				
		Average I	Ripping W	igth:	400.00	feet/pass				
		Averag	ge Dozer Sp	eed:	88.00	feet/min	ute			
		Average N Production	Maneuver T	ime:	0.25	minutes/	pass			
			on per unit a	arca	0.001		11			
	Job Condition Corr	ection Factors								
	Unad	ljusted Hourly U	Jnit Produc	tion:	0.881	Acres/hr				
			Site Altit	ude:	5,100	feet				
			Altitude	Adj:	$\frac{1.00}{0.83}$	(CAT HI	B)			
			Net Correc	tion:	0.83	(1 sint/e	er			
		Adjusted H Adjusted H	lourly Unit ourly Fleet	Production: Production:	0.73 1.46	Acres/hr Acres/hr				
	JOB TIME AND COST									
	Fleet size:	2	Grader(s)		Total job time	e:40).06	Hour	ſS	
	Unit cost:	\$640.384	Per acre		Total job cost	t: \$37	7,526			

CIRCES Cost Estimating Software

SCRAPER TEAM WORK

	Pueblo Cement P	lant and	Permit	t Action:					
Site:	Limestone Quarr	у			2024 TR13	Perr	nit/Job#:	M2002	004
Ī	PROJECT IDEN	TIFICATION							
	Task #: 006	S	state: (Colorado		Abbrev	viation:	None	
	Date: 4/15/20	024 Cor	unty: l	Pueblo		Fil	ename:	M004-0	06
	User: JLC								
	Agency or o	organization name:	DRM	S					
Ī	HOURLY EQUIP	<u>PMENT</u>			COSTSI	nift basis: <u>1 per d</u>	<u>ay</u>		
				Equipm	ent Description				
		-S	craper:	Cat 63'	7G w/push-pull				
	C	- 	Dozer:	NA					
	Suppo	ort Equipment -Load	d Area:	NA NA					
	Road Ma	intenance – Motor (Grader:	CAT 1	4M				
		-Water	Truck:	Water '	Tanker, 10,000 Ga	1.			
	~	~ …			~ ~ .			-	
<u>(</u>	<u>Cost Breakdown</u> :	Scraper Wo	k Team		Support Equip	Dump Area	Maint Motor C	enance E	Equipment Water T
		Scraper	Do	zer	Load Area	Dump Area	Motor C	frader	water 1
%U	tilization-machine:	100		NA	NA	NA		50	
Ow	/nership cost/hour:	\$255.23		NA	NA	NA	\$1	49.33	\$13
0	perating cost/hour:	\$280.59		NA	NA	NA	\$	646.40	\$8
%	Utilization-ripper:	NA		NA	NA	NA		0	
Ripp	ber own. cost/hour:	NA		NA	NA	NA		\$5.83	5
Rij	pper op. cost/hour:	NA		NA	NA	NA		\$0.00	5
(Operator cost/hour:	\$47.07		NA	NA	NA	9	646.87	9
	Unit Subtotals:	\$582.89		NA	NA	NA	\$2	248.43	\$21
	Number of Units:	6		0	0	0		1	
	Group Subtotals:	Work:	\$3,49	7.34	Support:	\$0.00	I	Maint:	\$466.9
г <u>М</u>	Fotal work team cost	t/hour: <u>\$3,964.32</u>							
	Initial volume:	60,016		CCY	Swell fact	or: 1.125			
	Loose volume:	67,518		LCY					
	Sou	rce of estimated vo	lume:	Table L.	-1 AM-01. Inspect	ion Map. 2'OB+1	'TS		
	Source	of estimated swell f	actor:	Cat Han	dbook	p, = 0.0 + 1			
Ī	HOURLY PROD	UCTION							
					Scraper Bo	owl (volume) Basi	is:		
	Material weight.	2.650 lbs/LCY			Struck	Volume: 24.00		LC	Y
Μ	laterial description:	Decomposed rock 75% Earth	k - 25% I	Rock,	Heaped V	Volume: 34.00		LC	Ŷ
	Rated Pavload	81.600 pounds			Average	Volume: 20.00		I C	V

<u>1.00</u> Minutes

0.60 Minutes

Payload Capacity: 30.79 LCY

Cycle Time:

Scraper Loading Time: Maneuver and Spread Time:

Job Condition Correction:

Site Altitude: 5100 feet

	Scraper	Push Dozer	Source
Altitude Adj:	1.000	NA	(CAT HB)
Job Efficiency:	0.830	NA	(CAT HB)
Net Correction:	0.830	NA	

Travel Time:

Road Condition: Hard, smooth, stabilized, surfaced, watered, maintained 2.0

Haul Route:

Seg #	Haul Distance (Ft)	Grade (%)	Roll. Res (%)	Total Res (%)	Velocity (fpm)	Travel Time (min)
1	1000.00	4.00	2.00	6.00	1477	0.76

Haul Time: 0.76 minutes

Return Route:

Seg #	Haul Distance (Ft)	Grade (%)	Roll. Res (%)	Total Res (%)	Velocity (fpm)	Travel Time (min)
1	1000.00	-4.00	2.00	-2.00	2972	0.41

Return Time: 0.41

—		
Total Scraper team cycle time:	2.77	minutes
Adjusted for job conditions:	1,042.74	LCY/Hour

minutes

Selected Number of Scrapers:2Scraper(s)Adjusted single scraper team (unit) hourly production:1,042.74LCY/HourAdjusted multiple scraper team (fleet) hourly production:3,128.23LCY/Hour

Unadjusted unit production/hour: <u>1,256.32</u> LCY/Hour Optimal Number of Scrapers per push dozer:

JOB TIME AND COST

Fleet size:	3	Team(s)	Total job time:	21.58	Hours
Unit cost:	\$1.267	/LCY	Total job cost:	\$85,564	_

REVEGETATION WORK

ite:	Pueblo Cement Plant and Limestone Quarry		and Pe	Permit Action:		Permit/Job#: <u>M2002004</u>	
<u>PR</u>	OJECT	IDENTIFIC	CATION State:	Colorado		Abbreviation	None
	$1 \text{ ask } \pi$.	007		Dull			M004 007

FERTILIZING

Materials

Description	Units / Acre	Unit	Cost / Unit	Cost /Acre
			\$	\$
			Total Fertilizer Materials	
			Cost/Acre	\$0.00

Application

Description	Cost /Acre
	\$
Total Fertilizer Application Cost/Acre	\$0.00

TILLING

Description	Cost /Acre
Weed control spraying (MEANS 31 31 16.13 3100)	\$338.80
Total Tilling Cost/Acre	\$338.80

SEEDING

Seed Mix	Rate – PLS LBS / Acre	Seeds per SQ. FT	Cost /Acre
			\$
Totals Seed Mix	0.00	0.00	\$0.00

Application

Description	Cost /Acre

	\$
Total Seed Application Cost/Acre	\$0.00

MULCHING and MISCELLANEOUS

Materials

Description	Units / Acre	Unit	Cost / Unit	Cost /Acre
			\$	\$
Total Mulch Materials Cost/Acre				\$0.00

Application

Description		Cost /Acre
		\$
	Total Mulch Application Cost/Acre	¢0.00

NURSERY STOCK PLANTING

Common Name	No / Acre	Type and Size	Planting Cost	Fertilizer Pellet Cost	Cost /Acre
					\$
		Totals	Nursery Stoc	k Cost / Acre	\$0.00

JOB TIME AND COST

Estimate *Selected Replanting	No. of Acres: ed Failure Rate: ng Work Items:	191.2 0% NONE	Cost /Acre: Cost /Acre*:	\$338.80 \$0.00
Initial Job Cost:	\$64,778.56			
Reseeding Job Cost:	\$0.00			
Total Job Cost:	\$64,779			
Job Hours:	24.00			

REVEGETATION WORK

r uebio C	Cement Plant a	and Per	rmit Action:			
Limestor	ne Quarry			2024 TR13	Permit/Jol	o#: M2002004
Task #:	008 4/15/2024	State: County:	Colorado Pueblo		Abbreviation: Filename:	None M004-008
Date:						

FERTILIZING

Materials

Description	Units / Acre	Unit	Cost / Unit	Cost /Acre
5-10-10, 5-10-15, 6-12-12	100.00	pound	\$0.39	\$39.00
			Total Fertilizer Materials Cost/Acre	\$39.00

Application

Description		Cost /Acre
Tractor towed spreader (MEANS 32 01 90.13 0120)		\$41.82
	Total Fertilizer Application Cost/Acre	\$41.82

TILLING

Description	Cost /Acre
Disc harrowing, 6" deep (MEANS 32 91 13.23 6100)	\$112.82
Weed control spraying (MEANS 31 31 16.13 3100)	\$338.80
Total Tilling Cost/Acre	\$451.62

SEEDING

Seed Mix	Rate – PLS LBS / Acre	Seeds per SQ. FT	Cost /Acre
Switchgrass - Blackwell	1.00	8.93	\$11.50
Blue Grama - Native	1.00	16.32	\$13.73
Buffalograss - Native/Plains	2.00	1.93	\$24.13
Sand Dropseed	0.25	29.84	\$2.44
Little Bluestem - Native	1.00	5.97	\$13.57
Sideoats Grama - Vaughn	3.00	9.85	\$25.13
Western Wheatgrass - Native	2.00	5.05	\$12.00
Prairie Junegrass	0.25	13.29	\$6.50

|--|

Application

Description		Cost /Acre
Drill Seeding (DRMS Survey Cost)		\$232.00
	Total Seed Application Cost/Acre	\$232.00

MULCHING and MISCELLANEOUS

Materials

Description	Units / Acre	Unit	Cost / Unit	Cost /Acre
Hay, delivered {MEANS 31 25 14.16 1200}	2.00	TON	\$429.79	\$859.57
Total Mulch Materials Cost/Acre				\$859.57

Application

Description		Cost /Acre
Crimping, with tractor {DMG survey data}		\$74.46
Power mulcher (MEANS 32 91 13.16 0350)		\$147.67
	Total Mulch Application Cost/Acre	\$222.13

NURSERY STOCK PLANTING

Common Name	No / Acre	Type and Size	Planting Cost	Fertilizer Pellet Cost	Cost /Acre
					\$
		Totals	Nursery Stoc	k Cost / Acre	\$0.00

JOB TIME AND COST

No. of Acres:	98	Cost /Acre:	\$1,955.13
Estimated Failure Rate:	25%	Cost /Acre*:	\$340.99
*Selected Replanting Work Items:	SEEDING		

Initial Job Cost:	\$191,602.74
Reseeding Job Cost:	\$8,354.26
Total Job Cost:	\$199,957
Job Hours:	60.00

Page 1 of 3

EQUIPMENT MOBILIZATION/DEMOBILIZATION

T	ask description:	Mo	bilization/Demob	lilzation				
e: _	Pueblo Cement Limestone Qua	Plant and rry	Permit	Action:2024	TR13		Permit/Job#: <u>N</u>	//2002004
<u>PR</u>	ROJECT IDEN	TIFICATI	<u>ON</u>					
	Task #• 009		State: Co	olorado		Abbre	eviation Non	e
	Date: $\frac{000}{4/15/}$	/2024	County: Pu	eblo		Fi	ilename: M00	4-009
	User: JLC		·					
	Agency or	organization	n name: DRMS					
		U						
EC)UIPMENT TI	RANSPOR	<u>T RIG COST</u>					
						Shift ba	usis: 1 per d	av
						Cost Data Sou	rce: CRG D	ata
	T 1 1							
	Truck	Tractor Desc	ription: GENE	RIC ON-HIGH	400 HD	UCK TRACTO	OR, 6X4, DIESE	L POWERED,
	Travala	Trailar Daga	nintion.	ENEDIC EOLD		(2ND HALF,	2000)	UDMENT
	ITUCK	Trailer Desc	ription: G	ENERIC FULL	TRATIER	$(25T 50T \Lambda)$	ND 100T)	JIPMENI
				-	INAILLI	(251, 501, A	(D 1001)	
Co	<u>st Breakdown:</u>							
A	vailable Rig Ca	pacities	0-25 Tons	26-50 Tons	51-	+ Tons		
-	Ownership (Cost/Hour:	\$20.26	\$36.04	\$4	47.05		
-	Operating (Cost/Hour:	\$39.51	\$76.08	\$82.85			
	Operator (Cost/Hour:	\$22.52	\$22.52	\$2	22.52		
	Helper (Cost/Hour:	\$0.00	\$23.53	\$2	23.53		
	Total Unit (Cost/Hour:	\$82.29	\$158.17	\$1	75.95		
NC	ON ROADABL	E EQUIPN	MENT:					
N	Inching	Weight/	Owner ship	Houl Dig	Float	Houl Trip	Return Trin	DOT Permit
	Addinine Description	Weight/	Cost/br/ unit	Gost/br/uni	Fieel	Gost/br/	Cost/hr/ fleet	Cost/ fleet
	description	UIII (TONS)	Cost/m/ unit		Size	Cost/III/		
	at DOT OSU	(10NS)	\$257.08	l \$175.05	2	\$866.06	\$351.00	\$500.00
	'AT 1/M	23 57	\$155.16	\$175.95	1	\$237.45	\$82.20	\$250.00
	$a_{\rm A} = 140$	59.59	\$255.23	\$175.95	6	\$2,587.08	\$1.055.70	\$1,000,00
p	ull		<i>\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\</i>	<i>41</i> ,0.70	v	φ <u>2</u> ,507.00	\$1,000.10	\$1,000.00
W	Vater Tanker,	41.10	\$135.95	\$158.17	1	\$294.12	\$158.17	\$250.00
1	0,000 Gal.							
D	rill/Broadcast	25.00	\$6.73	\$82.29	2	\$178.04	\$164.58	\$250.00
S	eeder with							
T	ractor	C 00	¢25.04	¢92.20	1	¢109.22	¢92.20	¢250.00
	ower Mulcher	6.00	\$25.94	\$82.29	1	\$108.23	\$82.29	\$250.00
1 (1	JUWIE LD-90)	1		1				

Subtotals: \$4,270.98 \$1,894.93 \$2,500.00

ROADABLE EQUIPMENT:

Machine Description	Total Cost/hr/ unit	Fleet Size	Haul Trip Cost/hr/ fleet	Return Trip Cost/hr/ fleet
Light Duty Pickup, 4x4, 3/4 T.	\$15.83	1	\$15.83	\$15.83
		Subtotals:	\$15.83	\$15.83

CIRCES Cost Estimating Software

EQUIPMENT HAUL DISTANCE and Time

Nearest Major City or Town within project area region:	PUEBLO	
Total one-way travel distance:	10.00	miles
Average Travel Speed:	55.00	mph
Total Non-Roadable Mob/Demob Cost *	\$43,118.38	
Total Roadable Mob/Demob Cost ** ** one round trip, no haul rig:	\$5.76	

Transportation Cycle Time:

	Non-	
	Roadable	Roadable
	Equipment	Equipment
Haul Time (Hours):	0.18	0.18
Return Time (Hours):	0.18	0.18
Loading Time (Hours):	2.10	NA
Unloading Time (Hours):	2.10	NA
Subtotals:	4.56	0.36

JOB TIME AND COST

Total job time: 9.13 Hours

Total job cost: **\$43,124**

MISCELLANEOUS TRUCK WORK

,	Task description:	Lube Truck			
Site:	Pueblo Cement Plant a Limestone Quarry	nd Permit Action:	2024 TR13	Permit/Job#:	M2002004
]	PROJECT IDENTIFIC	CATION			
	Task #:010Date:4/15/2024User:JLCAgency or organi	State: <u>Colorado</u> County: <u>Pueblo</u> zation name: <u>DRMS</u>		Abbreviation: Filename:	None M004-010
]	HOURLY EQUIPMEN	NT COST			
	Make and Model: Attachment 1: Attachment 2: Labor Unit 1: Labor Unit 2:	Lube Truck, 6x4, 250 HP Fuel/Lube Truck Driver		Horsepow Shift Bas Weig	er: 250 iis: 1 per day ht: (US Tons)
<u>(</u>	Cost Breakdown:				
	Ownership Cost/He Operating Cost/He Operator Cost/He Total Unit Cost/He Total Fleet Cost/H	Sur: \$16.65 our: \$37.60 our: \$38.91 our: \$93.16 four: \$93.16	Utilization % NA 100 NA		
2	JOB TIME AND CO	<u>ST</u>			
	Fleet size: 1	Truck(s)	Total job time:	100.00	Hours
	Unit cost:\$93.1	6 /Hour	Total job cost:	\$9,316	

MISCELLANEOUS TRUCK WORK

,	Task description:	Fuel Truck			
Site:	Pueblo Cement Plant a Limestone Quarry	nd Permit Action:	2024 TR13	Permit/Job#:	M2002004
]	PROJECT IDENTIFIC	CATION			
	Task #:011Date:4/15/2024User:JLCAgency or organized	State: <u>Colorado</u> County: <u>Pueblo</u> zation name: <u>DRMS</u>		Abbreviation: Filename:	None
]	HOURLY EQUIPMEN	<u>NT COST</u>			
	Make and Model: Attachment 1: Attachment 2: Labor Unit 1: Labor Unit 2:	Fuel Tanker, 6x4, 210 HP Fuel/Lube Truck Driver		Horsepowe Shift Bas Weigh	er: 210 is: 1 per day ht: (US Tons)
<u>(</u>	Cost Breakdown:				
	Ownership Cost/Ho Operating Cost/Ho Operator Cost/Ho Total Unit Cost/Ho Total Fleet Cost/H	bur: \$16.65 bur: \$37.60 bur: \$38.91 bur: \$93.16 bur: \$93.16	Utilization % NA 100 NA		
2	JOB TIME AND CO	<u>ST</u>			
	Fleet size: 1	Truck(s)	Total job time:	100.00	Hours
	Unit cost:\$93.1	6 /Hour	Total job cost:	\$9,316	

MISCELLANEOUS TRUCK WORK

Task description:	Construction Management	l'ruck		
Pueblo Cement Plant a Site: Limestone Quarry	Permit Action:	2024 TR13	Permit/Job#:	M2002004
PROJECT IDENTIFI	<u>CATION</u>			
Task #:012Date:4/15/2024User:JLCAgency or organic	State: Colorado County: Pueblo ization name: DRMS		Abbreviation: Filename:	None M004-012
HOURLY EQUIPMEN	<u>NT COST</u>			
Make and Model: Attachment 1: Attachment 2: Labor Unit 1: Labor Unit 2:	Light Duty Pickup, 4x4, 3/4 T		Horsepow Shift Bas Weig	er: 160 is: 1 per day ht: 2.25 (US Tons)
Cost Breakdown:				
Ownership Cost/H Operating Cost/H Operator Cost/H Total Unit Cost/H Total Fleet Cost/H	our: \$5.01 our: \$10.82 our: \$72.80 our: \$88.63 Hour: \$88.63	Utilization % NA 100 NA		
JOB TIME AND CO	<u>IST</u>			
Fleet size: 1	Truck(s)	Total job time:	100.00	Hours
Unit cost:\$88.6	53 /Hour	Total job cost:	\$8,863	



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

Groundwater Monitoring: Sampling and Analysis Plan Guidance Construction Materials and Hard Rock Sites

September 2023

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Introduction

This document is intended to provide guidance to permittees of Construction Materials or Hard Rock mines, on the typical requirement of a groundwater sampling and analysis plan, where the proposed operation has the potential to adversely impact the prevailing hydrologic balance of the affected land and of the surrounding area, with respect to the quantity and quality of water in groundwater systems. It is intended to supplement the <u>Groundwater Monitoring and Protection Technical Bulletin of November 19, 2019</u>, and is an attempt to provide more detailed and specific guidance to permittees in an area where the Division has found approaches to compliance have varied widely.

Sites where mining will not expose groundwater, e.g., dry sites or sites where mining will not be near the water table, are not required to submit a groundwater sampling and analysis plan.

A Sampling and Analysis Plan should be tailored to the specific site to which it applies, but this guidance document does not take site-specific factors into account.

The remaining sections of this document are organized under the same headings that the Division would expect to see in a typical groundwater sampling and analysis plan.

Hyperlinks are included in the document text for convenience, and a full list of references is given at the end.

1 Background Information

1.1. Site Description

The Site Description should include the following:

- Name of the site or sampling area. Also include the name or abbreviation (e.g., "the Site"), if any, that will be used throughout the plan.
- A general description of the region in which the site or sampling area is located. Include the street address, city, state, and postal code, if appropriate.
- A detailed description of the physical geography of the site or sampling area. Include a description of the topography, land use/surface cover, any relevant physical features, past and present activities, existing structures. Give the area in acres.
- A description of the geology of the area, including lithology and stratigraphy. Give the composition, thickness and extent of each formation. Identify any faults or other major structural features in the area. Diagrams are often a helpful addition to a geologic description.
- A description of the hydrogeology of the area. Identify each aquifer underlying the site. Characterize each aquifer (hydraulic conductivity, isotropy, confined/unconfined, recharge zones, groundwater flow direction) and describe how the characterization was made. Identify aquitards/confining layers.
- At least two maps:
 - \circ A vicinity map that shows the permit area within its geographic region.
 - A Monitoring Well Location map that shows the sampling sites or sampling areas within the local area. Scale criteria need not be followed for this map. The map should include a layer of projected potentiometric contour lines for each identified aquifer, or a groundwater directional flow arrow (if appropriate). All permitted wells within the map extent should be shown – this information is available from the Division of Water Resources (DWR). All sampling locations (historic, active and planned) should be shown. All springs and seeps should be shown. The outcrop of any geologic formations should be shown. Other physical features and man-made structures may be included for clarity.

All maps should include a title, legend, North arrow, scale bar, date, and section lines/marks. All maps must be prepared and signed by a registered land surveyor, professional, engineer, or other qualified person.

1.2. Baseline Groundwater Characterization

A Sampling and Analysis Plan will be informed by a baseline characterization of groundwater at the site, but may also need to include a plan to collect the data that will allow the initial characterization to be made. Applicants are encouraged to utilize information available from the public domain literature

and private sector data in developing their baseline groundwater characterization. These data sources will not require a Notice of Intent (Rule 5) to perform exploration operations. Private sector sources will likely include environmental site assessments performed as part of land acquisition.

Baseline sampling should be sufficient to allow the Division to assess the impacts of the future mining operation on the prevailing hydrologic balance. Sampling locations should be established upgradient and downgradient of the proposed operation, the number of sampling locations is not specified since it depends greatly on the site, (a minimum of three data points are needed to establish groundwater flow direction). Unless otherwise approved by the Division, all groundwater monitoring wells should be within the permit area. The screened intervals of groundwater monitoring wells should be sufficient to monitor each identified aquifer. Samples should be taken with sufficient frequency to capture site-specific temporal variability. The duration of the sampling period should be sufficient to identify seasonal trends. The <u>minimum</u> sample location, frequency and duration requirements for baseline groundwater characterization are summarized below:

- Upgradient and downgradient sampling locations in each identified aquifer
- Samples taken quarterly
- Five consecutive quarters of data

A table should be included with a row for each sampling location. Each point should have a unique identifier. The table should include the location (Lat/Long), land surface elevation, top of casing elevation, total depth, screened interval, and completion date. The latitude/longitude could be shown in decimal degrees showing five places to the right of decimal, e.g., 39.73934, -104.98486.

Upon request the Division is available for consultation during development of a Sampling and Analysis Plan.

1.2.1. Monitoring Well Installation

All monitoring wells should be:

- Permitted with the State Engineer's Office (SEO) Division of Water Resources (DWR); and
- Constructed (and later abandoned) according to the required SEO standards (see <u>2 CCR</u> <u>402-2 Rules and Regulations for Water Well Construction, Pump Installation, Cistern</u> <u>Installation, and Monitoring and Observation Hole/Well Construction</u>)

The well construction standards are designed to protect aquifer integrity and to ensure that constructed wells serve their purpose; in this case to provide representative, defensible data. Failure to follow the applicable permitting and well construction rules could result in unacceptable data; and failure to adequately protect groundwater resources could result in subsequent enforcement action as deemed appropriate by DRMS or the SEO.

All wells should be installed by a licensed contractor, as required by SEO. Site specific well placement and construction details should be recorded and approved by a qualified professional,

before being submitted to DRMS.

1.2.2. Baseline Groundwater Quantity

Baseline water level data should be recorded in a table, and a narrative description of how the data was collected should be provided. A graph of the water level against time at each monitoring point should also be included. In most cases a static water level can be measured using a depth gauge from the top of the casing, however if the aquifer is under confined conditions, and the pressure is such that the well is flowing, an alternative method will be necessary (for example: https://www.usgs.gov/media/videos/measuring-water-levels-a-flowing-well).

The potentiometric head at the well can be readily derived from the depth to water measurement and the casing elevation. Head measurements from three or more points may be interpolated to give a groundwater flow direction and an approximation of the potentiometric surface in the aquifer. In many cases it will be necessary to collect more data points to adequately characterize the pre-mining conditions.

Often a numerical model (for example: <u>Modflow</u>) will be an appropriate tool to characterize the hydrogeology of the site. In other cases, the Division acknowledges, routine one-dimensional groundwater equations may be appropriate to evaluate potential offsite hydrologic impacts. If a numerical model is used, it should be thoroughly documented, with all assumptions explicitly stated. The documentation should include:

- An explanation of the conceptual model, with assumptions explicitly stated
- A detailed description of the model grid, with figures
- A list of parameter values for boundary conditions and initial conditions
- Details of the model calibration

1.2.3. Baseline Groundwater Quality

A table should be provided with a complete list of water quality parameters to be measured. This will comprise both field parameters and laboratory analytes. The full parameter list should be based on Tables 1-4 from <u>Regulation 41: The Basic Standards for Groundwater</u> (Reg. 41). Parameters from these tables have been compiled in Appendix A for Construction Materials sites and Appendix B for Hard Rock sites.

The Division will entertain variances from the Reg. 41 list on a case-by-case basis, but any proposed variance must be justified.

Baseline groundwater quality data should be recorded in a table, with the sampling date. Minimum, maximum and average values for each parameter should be given.

2 Predicted Impacts to Hydrologic Balance

Following the characterization of baseline conditions a prediction should be made as to the possible impacts of the proposed mining operation on groundwater quantity and quality.

The prediction of likely impacts to groundwater quantity should include a prediction of the maximum spatial extent of drawdown caused by dewatering, or of mounding caused by impermeable cell liners/slurry walls, and the time-scale over which it will be observed. The extent and time to recovery to a steady-state following reclamation should also be predicted.

The prediction of impacts to groundwater quality should include a discussion of water quality parameters that may be elevated as a result of the proposed operation, and the likely spatial and temporal extent of the impact. It is noted here that <u>HB 19-1113</u>, which applies to Hard Rock Sites only and was signed into law on April 4, 2019, requires most reclamation plans to demonstrate, by substantial evidence, a reasonably foreseeable end date for any water quality treatment necessary to ensure compliance with applicable water quality standards.

If a numerical model is used to inform any of the hydrologic predictions the model should be thoroughly documented, as discussed in Section 1.2.2.

3 Groundwater Monitoring Plan

A monitoring plan sufficient to verify the predictions of hydrologic impacts should be proposed. The locations of sampling points, and the frequency at which they will be sampled should be specified. A complete list of groundwater quality parameters to be sampled for should be given. A description of sampling methods should be included in sufficient detail to ensure that the procedure can be replicated throughout the life of the permit (Sampling Methods are discussed in more detail below).

A commitment should be made as to how the monitoring data will be reported to the Division. Typically monitoring data will be compiled into a report, to be submitted by a specified date, e.g. annually or quarterly.

The groundwater monitoring report will include:

- Tabulated data for all parameters
- Graphs/plots for selected parameters
- A narrative analysis of the data, with trends and anomalies identified
- A comparison of the observed data to the predictions **and** to the groundwater quality standards (see below)

The requirements of the groundwater monitoring plan may continue to apply until final bond release and termination of jurisdiction. Changes to the groundwater monitoring plan will require a Technical Revision to the permit.

3.1. Groundwater Points of Compliance

It is likely that one or more Groundwater Points of Compliance (POC) will be established, these are locations at which compliance with the applicable standard will be assessed. Detailed guidance on POCs has been given in the <u>Groundwater Monitoring and Protection Technical Bulletin of November</u> <u>19, 2019</u>, and will not be repeated here. POCs should be identified in the groundwater monitoring plan.

3.2. Groundwater Quality Standards

As is discussed in detail in the <u>Groundwater Monitoring and Protection Technical Bulletin of</u> <u>November 19, 2019</u>, the Division does not have the authority to set groundwater quality standards, but it does have both the authority and the obligation to apply the standards set by the Water Quality Control Commission, (in practice, this often involves the determination of how the Interim Narrative Standard from Reg. 41 should be applied at a site). For the sake of clarity, the numerical values for groundwater quality parameters that represent the applicable standard should be agreed and recorded in a table at the same time the POCs are established.

4 Sampling Methods

The goal of sampling is to make accurate, repeatable field measurements and to collect representative groundwater samples for laboratory analysis. There is no single correct method to conduct groundwater sampling, however there many incorrect methods. Follow accepted best industry practices to ensure that a representative sample is collected and analyzed. Applicable references include those from the <u>US</u> <u>Environmental Protection Agency</u>, and the <u>US Geological Survey</u>.

It is likely that the contracted analytical laboratory will supply detailed instructions for sample collection and handling.

Best practices for sampling:

- Details of sampling events should be recorded documentation is critical for Quality Assurance
- All samples should be collected on the same day, if possible
- Sampling should occur in a progression from upgradient to downgradient wells
- Depth to water should be measured first
- Field instruments should be calibrated according to manufacturer's specifications prior to use
- Field parameters (temperature, pH, conductivity, dissolved oxygen) should be measured and recorded before and after each purge of the well
- A well should be purged at least three times before samples are collected for lab analysis; if field parameters vary by >10% between consecutive purges, purging should continue up to six times

- Samples should be collected in the appropriate container and handled in a manner appropriate for the analysis
- Manufacturer's instructions for the correct use and disposal of equipment should be followed
- Ship samples well before the holding time is up; ideally, within 24 hours of sample collection
- Do not leave sampling devices in monitoring wells for reuse

References

DRMS Groundwater Monitoring and Protection Technical Bulletin: November 19, 2019 https://drive.google.com/file/d/121Uc_KmuAx7xhc8heQcROPnK_u-kcG-J/view?pli=1

Well Construction Rules https://dwr.colorado.gov/services/well-construction-inspection

Modflow Documentation https://www.usgs.gov/mission-areas/water-resources/science/modflow-and-related-programs

Water Quality Control Commission regulations https://cdphe.colorado.gov/water-quality-control-commission-regulations

EPA Groundwater Sampling Methodology https://www.epa.gov/sites/default/files/2015-06/documents/Groundwater-Sampling.pdf

USGS National Field Manual for the Collection of Water-Quality Data <u>https://www.usgs.gov/mission-areas/water-resources/science/national-field-manual-collection-water-</u> <u>quality-data-nfm#overview</u>

HB 19-1113: Protect Water Quality Adverse Mining Impacts https://leg.colorado.gov/bills/hb19-1113

Analyte	Table Value Standard (mg/L, unless other units given)	Reg. 41 Table Reference (1-4)
pH Field (pH unit)	6.50 - 8.50	2 and 3
TDS	400 mg/L, or 1.25X background	4
Chloride - Dissolved	250	2
Fluoride - Dissolved	2	3
Nitrate (NO3)	10	1
Nitrite (NO2)	1.0	1
Nitrite + Nitrate as Nitrogen	10	1
Sulfate - Dissolved	250	2
Aluminum - Dissolved	5	3
Antimony - Dissolved	0.006	1
Arsenic - Dissolved	0.01	1
Barium - Dissolved	2	1
Beryllium - Dissolved	0.004	1
Boron - Dissolved	0.75	3
Cadmium - Dissolved	0.005	1
Chromium - Dissolved	0.1	1 and 3
Cobalt - Dissolved	0.05	3
Copper - Dissolved	0.2	3
Iron - Dissolved	0.3	2
Lead - Dissolved	0.05	1
Lithium - Dissolved	2.5	3
Manganese - Dissolved	0.05	2
Mercury - Dissolved	0.002	1
Molybdenum - Dissolved	0.21	1
Nickel - Dissolved	0.1	1
Selenium - Dissolved	0.02	3
Silver - Dissolved	0.05	1
Thallium - Dissolved	0.002	1
Uranium - Dissolved	0.0168 to 0.03	1
Vanadium - Dissolved	0.1	3
Zinc - Dissolved	2	3

Appendix A: Full parameter list for Construction Material Sites (with Table Value Standards) from Regulation 41, Tables 1-4

• These analytes, at a minimum, will be tested for during the five (5) quarters of baseline monitoring. It will be up to the Operator/Permittee to submit a Technical Revision with proper justification to reduce the analyte list.

Appendix B: Full parameter list for Hard Rock Sites (with Table Value Standards) from Regulation 41, Tables 1-4

	Table Value Standard	Reg. 41 Table Reference (1-4)	
Analyte	(mg/L, unless other units		
	given)	Kelerence (1-4)	
pH Field (pH unit)	6.50 - 8.50	2 and 3	
	400 mg/L, or 1.25X	Λ	
	background	4	
Chloride - Dissolved	250	2	
Fluoride - Dissolved	2	3	
Nitrate (NO3)	10	1	
Nitrite (NO2)	1.0	1	
Nitrite + Nitrate as Nitrogen	10	1	
Sulfate - Dissolved	250	2	
Aluminum - Dissolved	5	3	
Antimony - Dissolved	0.006	1	
Arsenic - Dissolved	0.01	1	
Barium - Dissolved	2	1	
Beryllium - Dissolved	0.004	1	
Boron - Dissolved	0.75	3	
Cadmium - Dissolved	0.005	1	
Chromium - Dissolved	0.1	1 and 3	
Cobalt - Dissolved	0.05	3	
Copper - Dissolved	0.2	3	
Iron - Dissolved	0.3	2	
Lead - Dissolved	0.05	1	
Lithium - Dissolved	2.5	3	
Manganese - Dissolved	0.05	2	
Mercury - Dissolved	0.002	1	
Molybdenum - Dissolved	0.21	1	
Nickel - Dissolved	0.1	1	
Selenium - Dissolved	0.02	3	
Silver - Dissolved	0.05	1	
Thallium - Dissolved	0.002	1	
Uranium - Dissolved	0.0168 to 0.03	1	
Vanadium - Dissolved	0.1	3	
Zinc - Dissolved	2	3	
Cyanide - Free	0.2	1	
Beta and Photon emitters	4 mrem/yr	1	
Gross Alpha	15 pCi/L	1	

• These analytes, at a minimum, will be tested for during the five (5) quarters of baseline monitoring. It will be up to the Operator/Permittee to submit a Technical Revision with proper justification to reduce the analyte list.