

STATE OF
COLORADO

Lennberg - DNR, Patrick <patrick.lennberg@state.co.us>

Additional Information Required, GW Data 2024, Parcel 122, M2015-033

Garrett Varra <gvarra@raptormaterialsllc.com>

Tue, May 21, 2024 at 4:38 PM

To: "Lennberg - DNR, Patrick" <patrick.lennberg@state.co.us>

Cc: Quentin Borum <qborum@raptormaterialsllc.com>, Robert Haun <rhaun@eaglematerials.com>, Jenna Lohmann <Jenna.Lohmann@respec.com>, Peter Christensen <Peter.Christensen@respec.com>, Joby Adams <joby@awes.com.co>

Good afternoon, Patrick.

I have received your questions regarding the groundwater monitoring for the M-2015-033 permit. Responses to those comments are below. I have copied and pasted your comments as well as reattached your letter for ease of reference.

The table provided has only four water level measurements that were taken after last year's submittal. Measurements were taken in June, July, November and February (2024). Please provide the missing monthly water levels or provide an explanation for the missing water level measurements. According to the approved groundwater monitoring plan monthly groundwater level measurements are to be provided with the annual report.

Response: We have had a local environmental consultant monitoring the groundwater levels at the site. During permit review we had a miscommunication on the timing of Monthly vs. Quarterly sampling. We have remedied that and will be collecting monthly data moving forward. No data exists for the missing months.

Please clarify what "destroyed" and "dead" mean for P-15 and P-18, respectively. If these wells have been decommissioned or destroyed they will need to be reinstalled or the groundwater monitoring plan needs to be updated to account for their removal from service with suitable justification for not reinstalling them.

Response: The P15 well has been destroyed and no longer functions. The location of this well is to be mined through per TR3 that will be approved as soon as bond is placed with the Division. Groundwater monitoring wells exist in locations around the site that allow for groundwater modeling to occur should modeling be necessary.

The P18 well has been destroyed and no longer functions. There are wells north, south and east of this well location that allow for groundwater modeling to occur should modeling be necessary.

Question: Is it the Division's assertion that a TR must be submitted to update the approved groundwater monitoring plan or that the wells must be replaced in this instance?

Please provide an explanation why the submitted water level data for Mayer (irrigation) and Mayer (offsite) have water levels that match the top of pipe elevations.

The Mayer wells were never intended to be part of the approved groundwater monitoring plan and are not within the site boundary. These wells had been monitored in order to reach agreement with Mayer Family Farm due to their objection to the permit. Agreement was reached and Mayer withdrew their objection. After some time, we discontinued monitoring these wells, however communication with the well owners continues to ensure the terms of the agreement are upheld. Only wells P11 through P19 were intended to be used for the approved groundwater modeling program. Other well data recorded in the past(wells P1, P2, P3 along with the Mayer Wells) was collected as supplementary data for the primary wells. Wells P11 through P19 within the M-2015-033 site allow for groundwater modeling to occur should modeling be necessary.

As part of this review the Division looked at the Exhibit G – Water Resources Map, submitted in April 2024, and was unable to locate all the piezometers contained in the groundwater level submittal. Please provide an updated location map showing the locations of all piezometers and monitoring locations at the site.

Please see the attached map. You will notice P3 is not on the map, as it was located off site and P1 was co-located with P16. P2 was an older well that was mined through.

Provide a graph or graphs for groundwater levels for each location that depict trends over the last two (2) years

Please see the attached .pdf labeled GW Graph 2022-2024

Thank you for your time and consideration. I had attempted to reach you at your desk phone this afternoon for a quick chat prior to responding, but could not reach you. So-- If you have any comments or questions, please give me a call at 720-272-2857.

--garrett varra

GM

Raptor Materials LLC

From: Lennberg - DNR, Patrick <patrick.lennberg@state.co.us>

Sent: Tuesday, May 21, 2024 10:41 AM

To: Garrett Varra <gvarra@raptormaterialsllc.com>

Subject: Additional Information Required, GW Data 2024, Parcel 122, M2015-033

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3 attachments



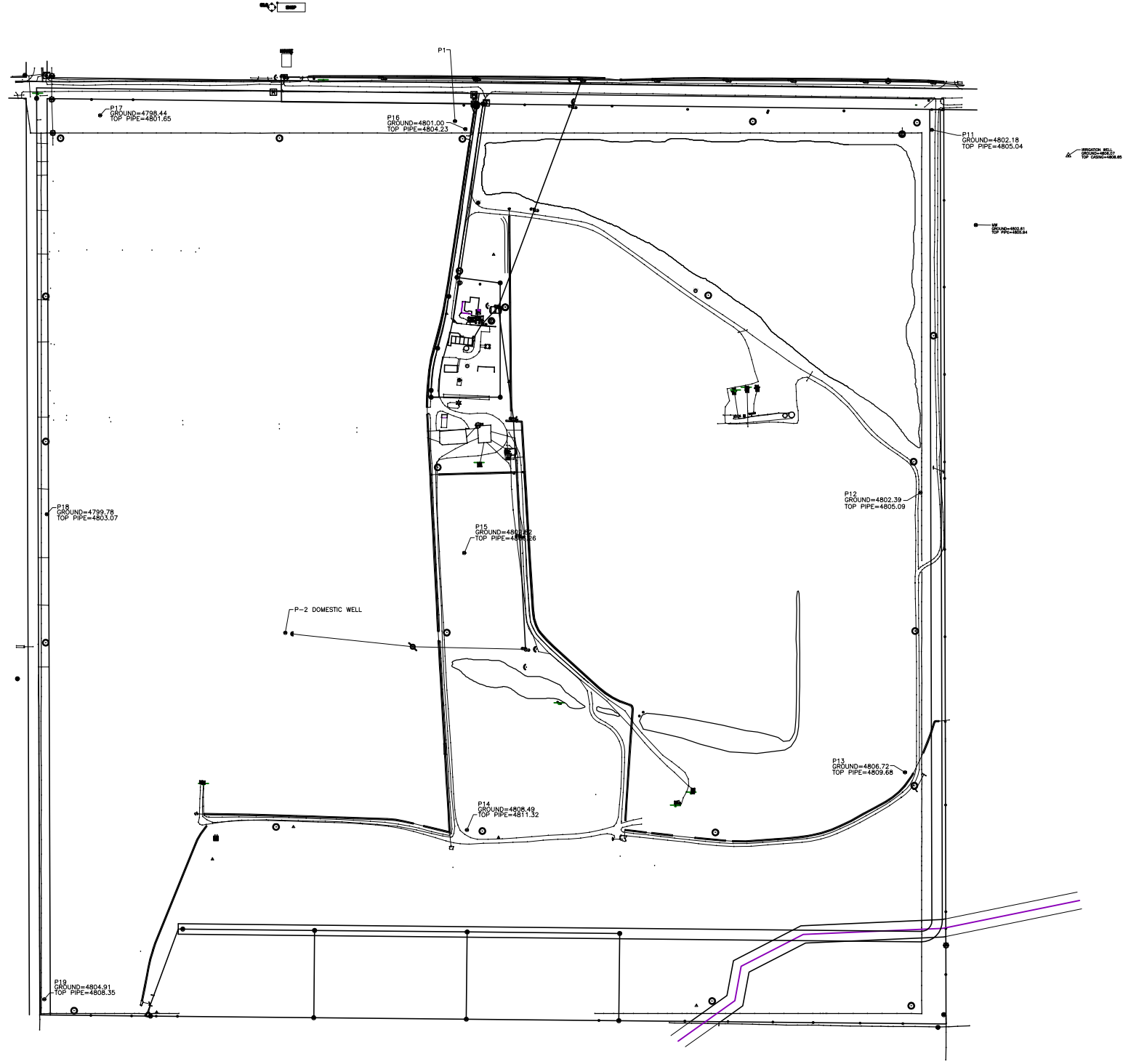
AddInfoReq_GW2024_M2015033.pdf
305K



Varra - (P122)Bearson Piezometer Map.pdf
83K



GW Graph 2022-2024.pdf
69K



VARRA COMPANIES, INC.
8120 GAGE STREET
FREDERICK, COLORADO 80534
TELEPHONE: (303) 666-6657

VARRA - BEARSON RESOURCE PIEZOMETER MAP
WELD COUNTY, COLORADO

SCALE: 1" = 400'

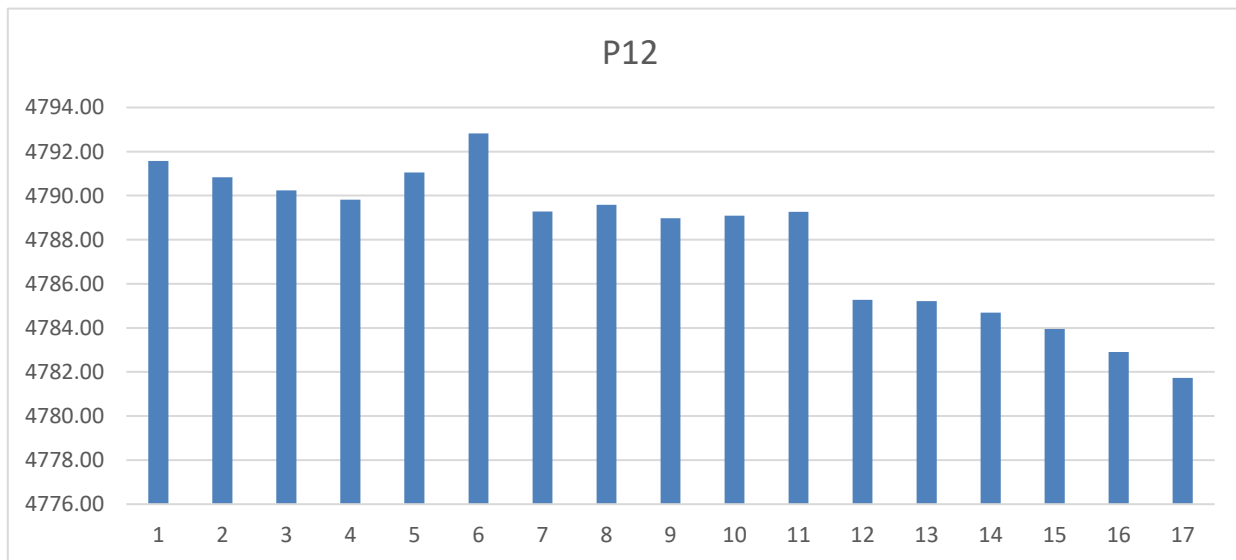
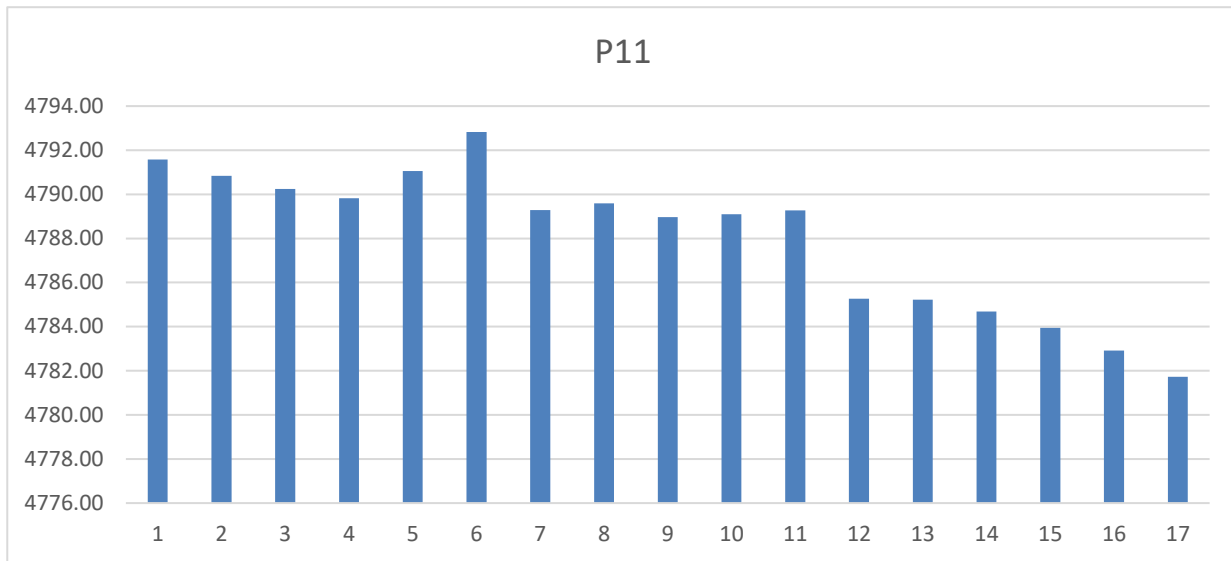
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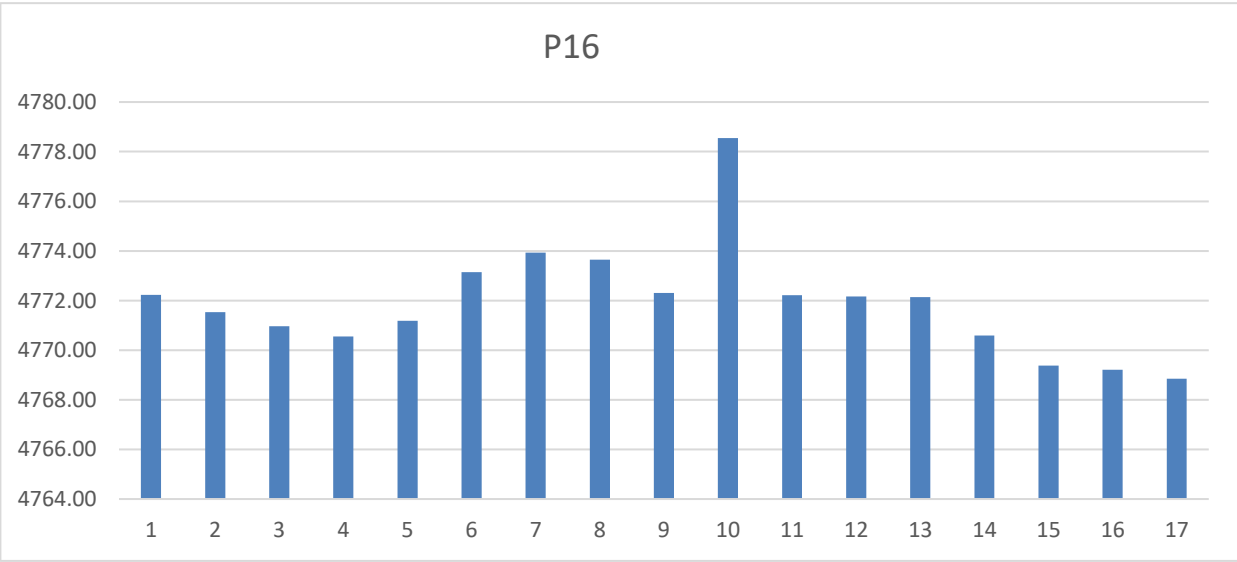
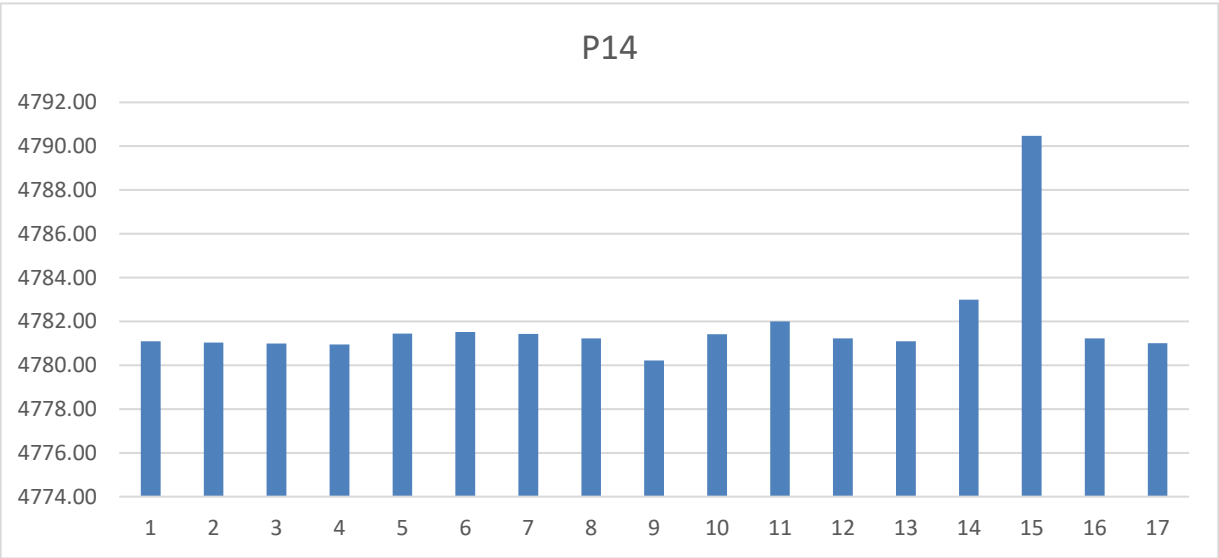
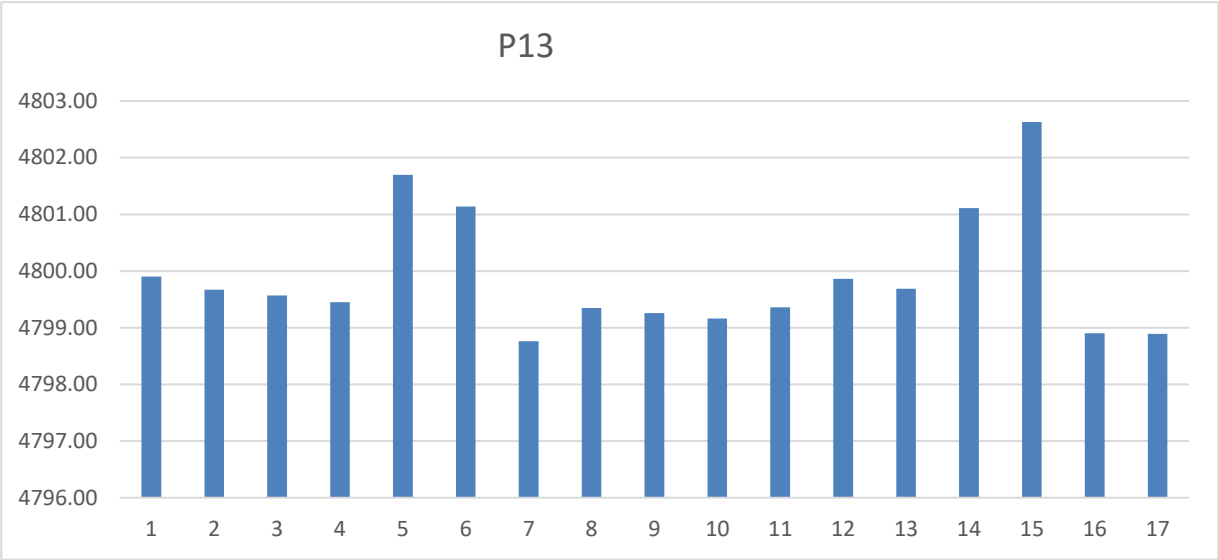
REVISION:

PAGE: 1 OF 1

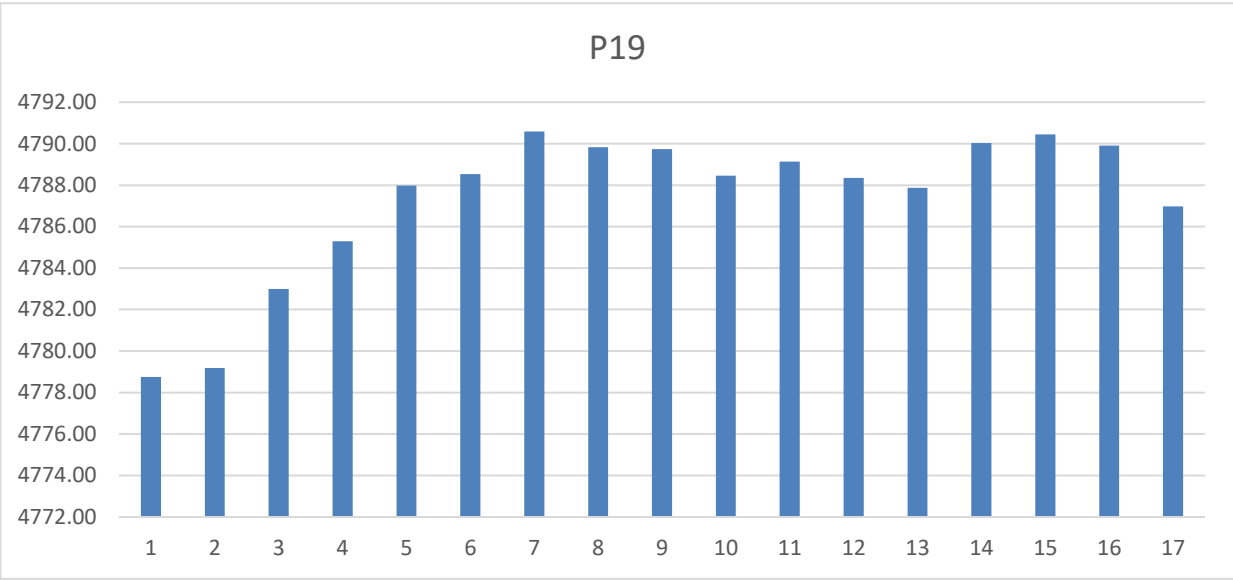
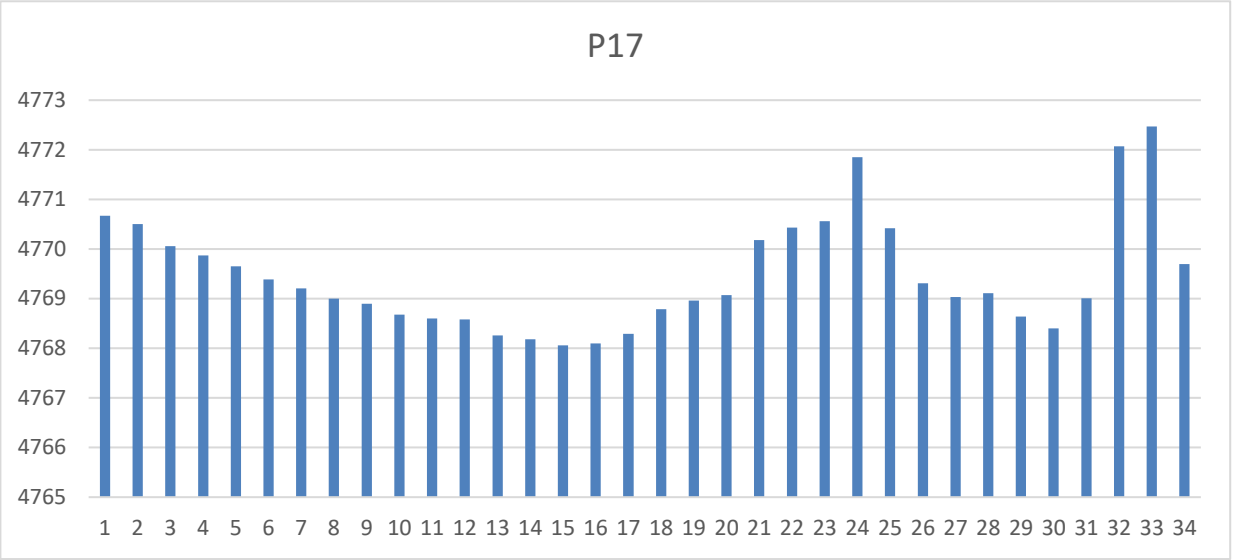


All Charts begin in January of 2022 with monthly values following with the exception of P17 which has additional weekly values for the first 6 months of 2022





More data points exist for the P17 well due to additional monitoring during 2022



May 21, 2024

Garrett C. Varra
Raptor Materials, LLC.
8120 Gage Street
Fredrick, CO 80516

**Re: Additional Information Required, Annual Groundwater Level Data for 2023-2024,
Parcel 122 – Resource Development Project, Permit No. M-2015-033**

Dear Mr. Varra:

On May 19, 2024, the Division of Reclamation, Mining and Safety (Division/DRMS) received your Annual Groundwater Level Data for 2024 from the Parcel 122 – Resource Development Project. After review of the submission the Division has additional items that need to be addressed or clarified.

1. The table provided has only four water level measurements that were taken after last year's submittal. Measurements were taken in June, July, November and February (2024). Please provide the missing monthly water levels or provide an explanation for the missing water level measurements. According to the approved groundwater monitoring plan monthly groundwater level measurements are to be provided with the annual report.
2. Please clarify what "destroyed" and "dead" mean for P-15 and P-18, respectively. If these wells have been decommissioned or destroyed they will need to be reinstalled or the groundwater monitoring plan needs to be updated to account for their removal from service with suitable justification for not reinstalling them.
3. Please provide an explanation why the submitted water level data for Mayer (irrigation) and Mayer (offsite) have water levels that match the top of pipe elevations.
4. As part of this review the Division looked at the Exhibit G – Water Resources Map, submitted in April 2024, and was unable to locate all the piezometers contained in the groundwater level submittal. Please provide an updated location map showing the locations of all piezometers and monitoring locations at the site.
5. Provide a graph or graphs for groundwater levels for each location that depict trends over the last two (2) years.

Please respond to these items within 30 days of the date on this letter, by **June 20, 2024**. The Division reserves the right to further supplement this document with additional items and details as necessary.

If you need additional information or have any questions, please contact me by telephone at 303-866-3567 x8114, or by email at patrick.lennberg@state.co.us.

Sincerely,



Patrick Lennberg
Environmental Protection Specialist

cc: Jared Ebert; DRMS

ec: Garrett C. Varra, Raptor Materials, LLC., gvarra@raptormaterialsllc.com