



July 3, 2024

Mike Toelle  
Holcim (US) Inc.  
3500 Highway 120  
Florence, CO 81226

Re: Boettcher Limestone Quarry, Permit No. M-1977-348, Technical Revision 12 (TR-12)  
Preliminary Adequacy Review

Dear Mr. Toelle:

The Division of Reclamation, Mining and Safety (Division/DRMS) has identified the following additional adequacy items in Technical Revision 12 Groundwater Monitoring at the Boettcher Quarry which much be addressed before an approval of this revision can be issued:

1. The last sentence of the Executive Summary states, "TR-12 requests the discontinuation of the groundwater monitoring program for the Site and release of reclamation liability in accordance with Construction Materials Rule 3 Section 3.17(8)." This rule citation is incorrect.

Construction Material Rule 3.1.7(8) requires an operator to demonstrate, to the satisfaction of DRMS, that reclamation has been achieved so that existing and reasonably potential future uses of groundwater are protected. Such a demonstration must be made by the operator and accepted by the Division prior to releasing reclamation liability for the site. The Division acknowledges that the Operator submitted TR-12 to demonstrate that existing and reasonably potential future uses of groundwater are protected. However, approval of TR-12 does not release the Operator from reclamation liability of the affected lands. Please acknowledge that per Rule 4.17, an Operator may file a written notice of completion of reclamation and request for release of reclamation responsibility with the Office whenever an Operator believes the requirements of the Act, the Rules and Regulations, and the approved reclamation plan have been completed. At that time, the Operator shall complete and submit a Request for Full or Partial Release of Permit Area form and submit it to the Division. Please revise the last sentence in the Executive Summary to be consistent with Rule 4.17 and resubmit the report with the additional edits discussed below. Please note the recommendations on page 18 need to be revised accordingly as well.

2. Page 5, last sentence of the first paragraph. The hydraulic conductivity value for the Codell Sandstone is missing a minus sign. Please update the text to show  $2.70 \times 10^{-3}$  ft/day.
3. Page 8, Selenium paragraph states, "Site wells were consistently below the BSGW and near the practical quantification limit (PQL)." Please define in the text what the PQL value is for selenium.



4. Page 8, Nitrate+Nitrite paragraph states, "Nitrite values are consistently below the PQL. Please define in the text what the PQL value is for nitrite.
5. Page 9, last paragraph states, "These values are similar to pH observed in the wells prior to CKD placement in area A2, and do not show the increase over time that would be expected if the groundwater was influenced by CKD." What pre-placement wells are you referring to? Please show this data in a table or provide backup for this statement.
6. Page 14, first paragraph Table 10 is incorrectly referenced as listing groundwater velocities. Groundwater velocities are listed in Table 12. Please update the reference.
7. Table 11: Statistical Evaluation of MW-8 includes the statement "All Values below PQL". Please revise the last column in the table to indicate the PQL values for the analytes reporting below PQL and resubmit Table 11.

This completes the Division's preliminary adequacy review. The decision date for TR-12 is currently set for **July 16, 2024**. If additional time is needed to address the adequacy items, an extension request must be received by our office prior to the decision date.

If you have any questions, please contact me by telephone at 720-527-1640 or by email at [nikie.gagnon@state.co.us](mailto:nikie.gagnon@state.co.us).

Sincerely,



Nikie Gagnon  
Environmental Protection Specialist

Cc: Sara Harkins, WSP  
Jennifer Thompson, WSP  
Amy Eschberger, DRMS  
Patrick Lennberg, DRMS