



January 21, 2025

Kevin Peart
Holcim – WCR, Inc.
1687 Cole Blvd. Suite 300
Golden, CO 80401

RE: Daniels Sand Pit 2, Permit No. M-1973-007-SG;
Technical Revision (TR-11) Adequacy Review #1

Dear Mr. Peart,

On December 19, 2024 the Division of Reclamation, Mining and Safety (Division) filed your Technical Revision request (TR-11) for the Daniels Sand Pit 2, Permit No. M-1973-007-SG. During review of the material submitted, the Division determined that the following issue(s) of concern need to be adequately addressed before the Technical Revision can be considered for approval. Please provide the following:

1. The map provided on page 99, after Fig. 3 '7 Year Planned Build Out 2' map, is illegible. Please provide a replacement map for this figure.
2. Have Factor of Safety analyses considered rapid drawn down stability calculations for the embankment? If so, please provide figures which illustrate this analysis. If not, please explain why rapid drawn down is not applicable to this project.
3. Has the dam raised study evaluated an embankment failure? If so, where, in what quantity, and to what elevation would an embankment failure expect to deposit water and or material? How would a failure impact Academy Blvd. specifically? Please discuss any plans on how the site might mitigate this risk or address it should the embankment fail.
4. In the initial permitting of this wash fines impoundment, possible effects on the Schlage lock pump & treat system were investigated. This investigation included reporting on possible groundwater mounding impacts to the lock system. It was reported that although possible mounding from the impoundment would increase the rate of flow of contaminated water to the system, that this would not negatively impact the system itself. Please provide information to ensure that the increased capacity of the impoundment will not have negative impacts on the Schlage pump & treat system.
5. Page 2 of the Dam Raise Study states that the current height of the embankment is 22.5 feet. Page 1 states that the proposed change is a 22.5 foot raise to the embankment. Is the Division correct in interpreting this to mean that the proposed dam raise would create an embankment with a final height of 45 feet? Please also ensure that all figures included in the Dam Raise Study, specifically the cross sections on Figure 6 match this maximum embankment height.



6. Clarify for the Division the sequence of Figures in Appendix A labeled as Fig. 1 -3. Do these figures represent a construction sequence? Why is the extended embankment shown on Fig. 2 but not Fig. 3?
7. Currently, water within the wash fines pond impounds to the northeast and fines slurry is deposited into the pond through the western embankment. Will the location of impounding water shift with this embankment raise? If so, will the wash fines discharge point remain on the western embankment, or will this be permanently relocated?
8. Where will water collected by the embankment's blanket drain / toe drain be discharged to onsite?
9. Will there be any additional height raises to the N, E, or S sides of the wash fines pond? Or will earthwork on these slopes be confined to minimal regrade to meet the required 3:1 slopes?
10. Please provide narrative to explain to the Division how the site can ensure that enough material of the classified soil composition assumed in the slope stability analysis and soil strength properties is available onsite to construct the embankment as designed and ensure a high enough FOS.

Please submit your response(s) to the above listed issue(s) by **February 4, 2025** in order to allow the Division sufficient time for review. If you cannot address the above issues by such date, please request an extension to the decision due date in order to ensure adequate time for the Division to review the materials. A decision due date of February 17, 2025 has been set. If any adequacy issues remain by the decision due date the Division may deny your request.

The Division will continue to review your Technical Revision and will contact you if additional information is needed.

If you require additional information, or have questions or concerns, please feel free to contact me at 720-868-7757 or hunter.ridley@state.co.us

Sincerely,
Hunter C. Ridley



Environmental Protection Specialist
CC: Zach Trujillo, DRMS