



J&T Consulting, Inc.

March 25, 2025

Mr. Patrick Lennberg
Environmental Protection Specialist
State of Colorado
Division of Reclamation, Mining, & Safety

Physical Address:

1313 Sherman Street, Room 215
Denver, CO 80203

Mailing Address:

Division of Reclamation, Mining and Safety, Room 215
1001 East 62nd Avenue
Denver, CO 80216

RE: *Bucklen Services Company, Inc. – Tollgate Pit – Technical Revision No. 1 - Allow for On-Site Processing of Mined Material - Preliminary Adequacy Review Response - File No. M-2018-060*

Dear Mr. Lennberg,

Bucklen Services Company, Inc. received the Preliminary Adequacy Review dated March 6, 2025. We are providing a response to each adequacy review comment below.

1. Pursuant to Rule 6.4.13 - Other Permits and Licenses, please provide a statement identifying any new or revised permits, licenses or approvals the Operator holds or will be seeking to process material at the site, including but not limited to any county zoning and land use permits, city zoning and land use permits, and air quality emissions permits.

Response: *The operator believes that no other permits are required at this time. There is an existing USR permit with Weld County in place (USR19-0058) for mining sand and gravel. There is an APEN for the mine itself and it is permit no. 19WE1039F. The processing equipment that will be used also have APENs and those permit numbers are 15WE0068 for the genset, 15WE0069 for the crusher, and 15WE0070 for the screen.*

2. Please state if the scale-house will be permanent or mobile for evaluating whether there are any bonding implications.

Response: *The scale and scale house are mobile and not permanent.*

3. It was noted during the 2021 inspection the installed slurry liner was undergoing a 90-day leak test. Please provide a statement on the results of the leak test and any relevant documentation from the State Engineer's Office.

Response: *The leak test was approved by the Division of Water Resources and the approval letter is attached.*

Bucklen Services Company, Inc. appreciates your consideration of this revision request and looks forward to your response. We believe these responses address your comments.



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Please feel free to contact me with any questions or comments.

Sincerely,



J.C. York, P.E.
J&T Consulting, Inc.

Attachments:

Leak Test Approval for Tollgate Pit

cc: Bucklen Services Company, Inc.
File





COLORADO
Division of Water Resources
Department of Natural Resources

November 5, 2020

Mike Smith
Lithos Engineering
2750 S. Wadsworth Boulevard, Suite D-200
Denver, Co 80227
Transmission via Email: mike@lithoseng.com

RE: SLURRY WALL LINER APPROVAL (PROVISIONAL)
TOLLGATE PIT RESERVOIR (WDID 0303512)
TOLLGATE PIT, DRMS M-2018-060 (WDID 0307925)
W1/2 OF THE SW1/4 OF SECTION 26, T6N, R66W
WATER DIVISION 1, WATER DISTRICT 3, WELD COUNTY

Dear Mr. Smith:

The purpose of this letter is to provisionally approve the lining of the Tollgate Pit Reservoir ("Reservoir"). The Reservoir is primarily located in the W1/2 of the SW1/4 of Section 29, Township 6 North, Range 66 West of the 6th P.M., and is part of the Tollgate Gravel Pit (DRMS M-2018-060). The Reservoir was lined with a soil bentonite slurry wall. The site is partially mined. The slurry wall liner leak test commenced on June 24, 2021 and concluded on September 21, 2021. A site inspection was performed by our office on July 19, 2021 to review site conditions and the leak test plan.

Your report dated October 12, 2021 provides the liner summary and leak test results. The test data provided indicates that the liner meets the design standard referenced in the August 1999 State Engineer Guidelines for Lining Criteria for Gravel Pits (1999 SEO Guidelines). **Meeting the design standard requires that during reservoir operations all water inflows and outflows for the liner perimeter enclosed area be accounted for on a monthly basis.**

This liner approval is applicable only during mining operations at the site and does not classify the structure as a reservoir capable of water storage. However, for the remainder of mining operations, water within the liner boundary is now classified as trapped native ground water. The trapped native ground water may be removed from within the lined area and returned to the stream system through surface flow or ground water recharge without the need for replacement so long as the operator does not put the water to beneficial use. All native trapped ground water remaining that is put to beneficial use (except for the water removed in product) must be replaced by the operator. All inflow of water into the liner boundary from any source, including precipitation and ground water inflows shall be removed by the pit operator so as not to cause out-of-priority storage. **In order for the liner to be approved for water storage the operator must perform a final leak test once mining is complete and the site is at final grade.** The final leak test will be allowed to have a modified duration of 45 to 60 days as long as the liner continues to satisfactorily operate during mining operations.

Please contact me at 303-866-3581 x8246 if you have any questions.

Sincerely,

Ioana Comaniciu, P.E.
Water Resource Engineer

Ec: Mark Simpson, District 3 Water Commissioner (Mark.Simpson@state.co.us)
Louis Flink, Diversion Records Coordinator (Louis.Flink@state.co.us)
Steve Kuehr, Lithos Engineering (steve@lithoseng.com)
Jon McElwain, Hall Irwin (jmcelwain@hall-irwin.com)
WDID File (0303512 & 0307925)

