



## Response to Reclamation Permit Application Consideration

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DATE: April 16, 2025

TO: Joel Renfro, Division of Reclamation, Mining & Safety (DRMS), [joel.renfro@state.co.us](mailto:joel.renfro@state.co.us)

CC: Division 1 Office, District 5 Water Commissioner, [shera.sumerford@state.co.us](mailto:shera.sumerford@state.co.us)

FROM: Ioana Comaniciu, P.E., State Engineer's Office (SEO), [ioana.comaniciu@state.co.us](mailto:ioana.comaniciu@state.co.us)

RE: **Cogburn Pit, File No. M-2025-016**

Applicant: Bob Haun, Raptor Materials, LLC

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(303) 666-6657

Contact: Quentin Borum, Raptor Materials, LLC

8120 Gage Street, Frederick, CO 80516

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Location: The E ½ of the SE 1/4, the NW ¼ of the SE ¼, the SW ¼ of the NE ¼,  
and the SE ¼ of the NW ¼ of Sec. 29, Twp. 3 North, Rng. 67 West, 6<sup>th</sup>  
P.M., Weld County

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### CONDITIONS FOR APPROVAL

The proposed operation will consume groundwater by: ☒ evaporation, ☒ dust control, ☒ dewatering, ☒ water removed in the mined product, ☒ washing, ☐ concrete production and ☒ reclamation.

☒ Prior to initiation of these uses of groundwater, the Applicant will need to obtain either a gravel pit or other type of well permit, as applicable.



- ☒ Prior to obtaining a well permit, an approved substitute water supply plan or decreed plan for augmentation is required.
- ☒ Prior to approving a well permit, the Applicant must conduct a field inspection of the site and document the locations of all wells within 600 feet of the permit area. The Applicant must then obtain a waiver of objection from all well owners with wells within 600 feet of the permit area or request a hearing before the State Engineer.

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**COMMENTS:** The subject application is for a surface mining and processing operation on approximately 196.4 acres, generally located in Sec. 29, Twp. 3 North, Rng. 67 West, 6<sup>th</sup> P.M., Weld County.

The mining operation consists of mining and processing sand and gravel to produce construction materials. The area will be revegetated and reclaimed as lined groundwater storage reservoirs (approximately 22.1 acres identified as P125A and 28.2 acres identified as P125B) and a portion of the exposed area (approximately 10.4 acres identified P125\_S1) will be backfilled with overburden from the adjacent sites Kurtz Pit (M1999-006) and Bearson Pit (M2015-003). The mining plan is estimated for 8 to 9 years following an additional five years to complete reclamation. The primary materials to be mined at the site are sand and gravel. Mining will occur in the alluvium of the St. Vrain River. Estimated depth to groundwater is 14 to 16 feet in the norther corner of P125A and between 7 to 9 feet in the eastern boundary of P125B. Groundwater will be consumed by evaporation, dust control, dewatering, water removed in the mined product, washing, and reclamation.

Prior to the use or exposure of any groundwater, the Applicant must first obtain a well permit and a substitute water supply plan ("SWSP") or decreed plan for augmentation to replace depletions caused by groundwater consumption. The site must continue to be operated under a SWSP or plan for augmentation until such time as the proposed reservoirs are lined (lining approved by this office, backfilling is completed, and replacement of lagged depletions shall continue until there is no longer an effect on stream). The application

indicates that the Applicant will apply for a gravel pit well permit, subject to the 600-foot spacing requirement, and an SWSP to augment river depletions.

Additionally, according to our records, there are several wells located on the subject property. Such wells must be operated in accordance with their permitted conditions and applicable statutes. Such wells cannot be used for the mining operation unless they are permitted for such use. If any wells will be plugged and abandoned, they must be plugged and abandoned in accordance with the Well Construction Rules 2 CCR 402-2 and a [Well Abandonment Report](#) must be filed with this office.

Additionally, in certain areas of the South Platte River Basin, SEO staff have observed groundwater problems that appear to be related to the lining of gravel pits located near streams, and in particular, these problems occur when multiple liners are located adjacent to each other. DRMS should consider the siting and design of lined gravel pits to ensure that they will not individually or cumulatively result in impacts to the timing and quantity of groundwater flow from upgradient locations back to the stream system. In addition to impacts to property, such as flooding upgradient and reduced water levels downgradient of the liner, there are decrees of the court that specify the timing, quantity, and amount of water depleted from the streams by wells and accreted to the stream through recharge operations. The installation of a gravel pit liner should not result in changes to the timing, location, and amount of such groundwater flows. In anticipation of this concern, the application indicates that mitigation measures such as dewatering wells or a perimeter drain will mitigate any mounding.

Any stormwater runoff intercepted by this operation that is not diverted or captured in priority must infiltrate into the ground or be released to the stream system within 72 hours. Otherwise, the operator will be required to make replacements for evaporation.

The Applicant may contact the State Engineer's Office at (303) 866-3581 with any questions.