



**COLORADO**  
Division of Reclamation,  
Mining and Safety  
Department of Natural Resources

May 29, 2025

Julie Mikulas  
Martin Marietta Materials, Inc.  
1800 N. Taft Hill Road  
Fort Collins, CO 80521

**Re: Adequacy Review No. 2, Technical Revision (TR-2) – Update Mining and Reclamation Plans and Maps; Parsons Mine, Permit No. M-2009-082**

Dear Ms. Mikulas,

On May 5, 2025, the Division of Reclamation, Mining and Safety (Division/DRMS) received your responses to the Division's Preliminary Adequacy Review letter dated November 26, 2024. After review of your responses the Division has identified additional items that need to be addressed to the Division's satisfaction.

1. The referenced SEO certification letter for Phase 2 (Cell 2) liner was missing from the submittal. Please provide the SEO liner certification letter.
2. The Division acknowledges that slurry walls will not be installed at the site and clay liners will be installed. Please provide the length of liner that will be installed in Phase 1A and 4A/4C. If liners have already been installed (other than Phase 2), please clearly indicate where and the length.
3. On the Reclamation Plan Maps cover sheet the Reclaimed Uses table needs to be updated to clearly indicate the number of acres that will be reclaimed with the Upland Seed Mix, Transitional Zone/Water's Edge, and Wetland Areas.
4. The Shoreline Tree and Shrub Plant List for Open Water Ponds needs to be updated with the number of trees and shrubs that are proposed to be planted per acre. The Reclamation Use table needs to be updated to clearly state the number of acres that will be reclaimed with the tree and shrub planting mixture these acres need to be clearly depicted on the associated Reclamation Plan Maps.
5. On the Reclamation Plan Maps it is not clearly shown where clay liners will be installed. For example, the dashed line around Phase 4A/4C is like the dashed line around Phase 1B but the Legend does not define either line type. The liners around the other phases are not clearly shown either.



6. Please clearly state which Phases will be backfilled, the quantity of material needed to backfill each Phase, and the type of material to be used for backfilling. If silt and fines are to be used, please state the effects, if any, the low permeable material will have on the hydrologic balance, specifically groundwater.
7. An updated reclamation cost estimate, broken down into the various major phases of reclamation, needs to be submitted and must be sufficient to calculate the cost of reclamation that would be incurred by the State pursuant to Rule 6.4.12. The current estimate does not address the items proposed in TR-2.

This concludes the Division's adequacy review of your application. The Division reserves the right to further supplement this document with additional adequacy items and/or details as necessary.

The decision date for your application is set for **June 19, 2025**. If additional time is needed to respond, an extension request must be received by our Office by the decision date. If on the decision date, outstanding adequacy items remain, and no extension request has been received, your revision may be denied and the file terminated.

If you need additional information or have any questions, please contact me by email at [patrick.lennberg@state.co.us](mailto:patrick.lennberg@state.co.us).

Sincerely,



Patrick Lennberg  
Environmental Protection Specialist

Attachment: Division Reclamation Cost Estimate

cc: Jared Ebert, DRMS

ec: Julie Mikulas, Martin Marietta, [Julie.Mikulas@martinmarietta.com](mailto:Julie.Mikulas@martinmarietta.com)