



Date: July 1, 2025

To: Ben Hammer

CC: Amy Eschberger
Zach Trujillo
Jared Ebert
Patrick Lennberg

From: Jocelyn Carter, DRMS Groundwater Task Force

Re: Limon Sand and Gravel Resource File No. M2024053, Groundwater Monitoring Plan Adequacy Review 2

Dear Ben,

On June 3, 2024, you provided the operator's response to the adequacy review of the Groundwater Monitoring Plan for the Limon Sand and Gravel Resource, operated by Mid-States Materials, LLC. A review of the response was completed, and the following items remain outstanding and require further attention:

1 Background Information

1.1 Site Description

1. Item #5 of the original review stated that two maps are required; one map to show the vicinity of the proposed permit area and its geographic region and a second map to show the proposed monitoring well locations, the potentiometric contour lines of the existing water table or details about the groundwater directional flow, information on all permitted wells, all springs and seeps, and any geological outcrops that may be present in the area. In response, the applicant pointed to Figure 1 for the proposed permit area and the geographic region and a map in Appendix 1 to satisfy the remaining requirements. Figure 1 is not a map; it does not meet the requirements of a map as outlined in Rule 6.2.1(2). A map needs to be submitted to show the proposed permit area and its geographic region.

1.2 Baseline Groundwater Characterization

2. In response to item #7 of the original adequacy review and the request to identify monitoring wells, the applicant has identified five wells within the proposed permit area and three wells outside the proposed permit area. Monitoring wells GW-1, GW-2, GW-3, GW-4, and GW-5 are located within the proposed permit area and will be sampled for



July 1, 2025
Ben Hammer
Division of Reclamation, Mining, and Safety
Inter Office Memo
Page 2 of 2

both quality and quantity. Monitoring wells D-1, D-2, and D-3 will be monitored for water depth only. According to the July 2024 Groundwater Monitoring: Sampling and Analysis Plan Guidance Construction Materials and Hard Rock Sites, groundwater monitoring wells should be within the permit area unless otherwise approved by the Division. The Division is willing to approve monitoring wells D-1, D-2, and D-3 for water levels only. However, the Division will not approve of monitoring wells located outside the proposed permit area that need to be reclaimed. Please indicate if wells D-1, D-2, and/or D-3 will need to be reclaimed upon termination of mining operations.

This concludes the second review of the provided Groundwater Monitoring Plan, created by Lewicki & Associates, that was submitted for the proposed Limon Sand and Gravel Resources mining operation, Permit No. M-2024-053. If you have any questions about this review or the items listed about, please contact me via email at Jocelyn.carter@state.co.us or by phone at (720) 666-1065.

Sincerely,



Jocelyn Carter
Environmental Protection Specialist
Division of Reclamation, Mining, and Safety