



To: Nikie Gagnon, Environmental Protection Specialist
Division of Reclamation, Mining and Safety
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From: Steve Kelton (skelton@brannan1.com)

Subject: Technical Revision, Nix Sand & Gravel Mine (M-2001-046), concerning changes related to address and water-related practices

Date: July 10, 2025

This Technical Revision is submitted to modify the M-2001-046 permit record with information pertaining to site address and water-related practices at the referenced Nix site. No other changes are proposed to the Mining Plan or Reclamation Plan currently approved by Reclamation Permit No. M-2001-046.

The site operator, Ready Mixed Concrete Company LLC ("RMCC," a wholly-owned subsidiary of Brannan) proposes the following revisions:

1. **New address.** The previous Technical Revision, TR 3, provided a revised mine plan showing the new right-in/right-out traffic lanes on Highway 66. With the entrance now moved from the south side of the Nix facility to the north side, Weld County provided a new address to be used in the future: 8760 Highway 66, Platteville, CO 80651. (For visits to the main plant, DRMS may with advance notice still access the site from County Road 28 on the southern edge of the property.)
2. **A replacement monitoring well.** One monitoring well was closed because it conflicted with the new egress to the plant on Highway 66. RMCC drilled a replacement well (MON-8A) 26 feet from the original well (MON-8). Because MON-8A allows sampling in essentially the same location as MON-8, the new well is substantially identical to the former well. This new information updates the wells listed on Figure 2 and Table 2 of the April 2023 Sampling and Analysis Plan—Revised ("2023 Plan").
3. **Acknowledgement that two water quality monitoring wells are dry.** Most likely due to dewatering at neighboring pits, NIX-OWENS-MON-1 and NIX-OWENS-MON-2 (both along the site's southern boundary) have run dry and no longer produce sampling

results. This new information updates the wells listed on Figure 2 and Table 2 of the 2023 Plan.

- 4. Recognition of the switch from Baseline Phase to Operational Phase.** The five quarters' worth of sampling described in the 2023 Plan is over and RMCC is switching to annual water quality testing every June. From June 2021 to September 2024, the Operator has performed eight water quality sampling events. The Baseline Data Summary Report is attached for your review.
 - 5. A shorter list of analytes and revised limits.** Based on initial test results and the fact that historical contamination predated the Nix mine and clearly was never connected to mine operations, the Operator is proposing two changes.
 - First, baseline data indicate that the Regulation 41 standards may not be suitable for all analytes, as several exhibit concentrations exceeding these standards due to elevated natural background levels. To address this, the operator proposes establishing revised limits by adding one standard deviation to the highest observed background concentration. This approach accounts for potential upward trends in analyte concentrations. A trend analysis has been conducted using linear regression to determine the trajectory (slope) of these concentrations over time. The validity of the regression model has been confirmed using the coefficient of determination (R^2) and p-values analysis, ensuring the reliability of the slope estimates.
 - Second, the Operator believes a shorter list of analytes is appropriate; initial test results support the idea that most analytes test below the appropriate limits. It does not make sense to spend thousands of dollars to continue testing for analytes that will not substantively add to the knowledge base. RMCC proposes to continue sampling parameters where the median value is 30% or greater than the applicable Regulation 41 standards. In doing so, RMCC is providing DRMS with data for 12 analytes, including 4 of which Brannan is well below the current applicable standards. Please see the attached Baseline Data Summary Report for details.
 - 6. Inclusion of water elevation data as part of RMCC's annual reporting.** RMCC has been tracking well water elevation for years and will include this data in future water monitoring reporting. The attached Baseline Data Summary Report includes graphs and water elevation data for all wells.
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Though RMCC believes these proposed changes provide a reasonable way to verify water quality at the Nix site and commits to future annual testing, it also notes that data collected since the site was originally permitted indicates external sources (i.e., ambient conditions) of exceedances, and that there is no basis to hold that adverse impacts to groundwater quality will occur due to the planned operation. Per DRMS Rule 3.1.7(7)(a), RMCC's groundwater monitoring program is voluntary unless and until potential adverse impacts to groundwater are reasonable attributed to the Nix operation.

Attached: TR Cover Sheet
Baseline Data Summary Report