



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

July 15, 2025

Robert Wagner  
RMR Aggregates, Inc.  
6200 S. Syracuse Way, Suite 450  
Greenwood Village, CO 801111

***RE: Mid-Continent LST, File No. M-1982-121 , Technical Revision (TR-9) Adequacy Review 2***

Dear Mr. Wagner:

On July 14, 2025, the Division of Reclamation, Mining and Safety (Division) filed your Technical Revision request TR-9 for the Mid-Continent LST, Permit No. **M-1982-121**. Adequacy responses were received on July 9, 2025. The Division determined that the following issue(s) of concern still need to be adequately addressed before the Technical Revision can be considered for approval. Please address the following:

- 1) The entirety of the TR-9 thus far has been marked confidential. If RMR believes that specific information should remain confidential under the CORA provision they should provide the Division with the proposed redactions. A publicly viewable document must be contained in the file.
  - a) Engineering model results in their entirety do not meet the requirements of Rule 1.3(3) and therefore must be provided under non-confidential cover.
- 2) As required in the Division's November 15, 2024, correspondence, please provide rock bolting quotes which correlate to the proposed Reclamation Plan.
- 3) Please address the concerns outlined in the memo from Zach Trujillo dated April 25, 2025 (attached) and summarized below.
  - a) Provide additional rationale as to why the Division may accept a result that does not meet the "critical" structure but does meet the "non-critical" structure FOS outlined in Section 30 of the MLRB Policies.
  - b) Please provide details and rationale regarding the seismic parameters applied to the pseudo-static models.



- c) Please provide the slope stability and active stabilization model results. These were previously provided under Exhibit D and G of TR-6. The Division must ensure it is representative of the site and consistent with previous models.

Please submit your response(s) to the above listed issue(s) by **Monday, August 4, 2025** in order to allow the Division sufficient time for technical review. If you cannot address the above issues by August 4, 2025 please request an extension to the decision due date to ensure adequate time for the Division to review materials. The current decision due date is **August 8, 2025**. If any adequacy issues remain by the decision due date the Division may deny your request.

The Division will continue to review your Technical Revision and will contact you if additional information is needed.

If you require additional information, or have questions or concerns, please feel free to contact me. Amy Yeldell at the Division of Reclamation, Mining and Safety, Room 215, 1001 E 62<sup>nd</sup> Ave Denver, CO 80216. Direct contact can be made by phone at 970-210-1272 or via email at amy.yeldell@state.co.us

Sincerely,



**Amy Yeldell**

Environmental Protection Specialist

Cc:

Travis Marshall, Senior EPS, DRMS

Zach Trujillo, Senior EPS, DRMS