

STATE OF  
COLORADO

Girardi - DNR, Chris &lt;chris.girardi@state.co.us&gt;

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**Alamosa Pit No. 2 (Swift Pit) M1983-175**

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**Girardi - DNR, Chris** <chris.girardi@state.co.us>

Mon, Jul 21, 2025 at 11:59 AM

To: PFM Consulting &lt;pfmconsultingcompany@gmail.com&gt;

Cc: Paul Bottini &lt;paul@southwayco.com&gt;, Jared Ebert - DNR &lt;jared.ebert@state.co.us&gt;

Hello Jodi,

I appreciate the initiative to expedite remediation and reclamation of the permit, as well as communicating the request before acting. However, the Division cannot approve this request at this time because it lacks sufficient detail on how the proposed inert fill importation and backfilling would align with the comprehensive remediation plan that is required. Furthermore, this request directly contradicts the proposed reclamation plan submitted with Amendment 1, which explicitly states, "All previously backfilled material that contains non-inert material will be removed prior to any further backfill operations onsite." Therefore, the Division denies this request.

However, the Division could consider approving a specific and detailed request in the form of a Technical Revision (TR) to import and temporarily stockpile inert fill material in a designated location within the permit area. This staged material could then be used as future backfill material once the remediation plan has been approved through AM1. This approach would also help reduce the financial reclamation liability by having backfill material staged on-site. The technical revision must include all detailed information required under Rule 3.1.5(9), with the understanding that the imported material would be temporarily stockpiled for use as backfill once remediation occurs and is confirmed successful.

Sincerely,

Chris Girardi

Environmental Protection Specialist

**COLORADO**  
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