



August 1, 2025

Steve Kelton
Ready Mixed Concrete Company
2500 East Brannan Way
Denver, CO 80228

Re: Nix Sand and Gravel Mine, Permit No. M-2001-046, Technical Revision 4, Adequacy Review

Dear Mr. Kelton:

The Division of Reclamation, Mining and Safety (Division) completed our review of the information submitted in Technical Revision 4 (TR-4) by Ready Mix Concrete Company (Operator/RMCC), filed on July 10, 2025, and determined that the following issues shall be adequately addressed before TR-4 can be considered for approval.

1. The Division acknowledges the new mine address for the site and the primary main entrance on the north side of the permit area, as approved in TR3. DRMS will contact the operator prior to entering on the south side, off County Road 28.
2. The Operator states that monitoring well Mon-8, located in the northeast corner of the permit area, has been replaced. Please provide the well construction report for the new well, Mon-8A, and the abandonment report for Mon-8. Additionally, please update Figure 2 in the 2023 Sampling and Analysis Plan to include Mon-8A on the map and add its location, elevation, and installation notes to the inset. Finally, revise Table 2: Groundwater Monitoring Stations to incorporate Mon-8A.
3. The Operator states, "Nix-Owens-Mon-1 and Nix-Owens-Mon-2 have run dry and no longer product sampling results. This new information updates the wells listed on Figure 2 and Table 2 of the 2023 Plan". The 2023 Sampling and Analysis Plan states that these wells have run dry, and RMCC will continue to test them for water. Are you proposing any changes to the monitoring plan for Mon-1 and Mon-2 in TR-4?

Similarly, the 2023 Plan states that Nix-Owens-Mon 4A has run dry. TR-4 reports only two quarters of water quality data for Mon-4A, although water level data is reported monthly. Please explain why five quarters of water quality data were not submitted for Mon-4A.

4. The Division's Sampling and Analysis Plan Guidance updated in September 2024 states on Page 5 that "once site groundwater characterization commences, it will be required that groundwater monitoring will continue for the life of the mine. Analytical sampling frequency will not be reduced to less than a minimum of twice yearly (high flow and low flow data with a collection



interval of 5-7 months)". Therefore, the Division cannot approve the proposed frequency for analytical sampling of 1x/yr as shown on the Proposed Analyte List table in the Baseline Summary Report. Please update the table and any references to 1x/year sampling and commit to biannual water quality testing during the high and low flow seasons.

5. The Division accepts RMCC's proposed sampling list and revised limits for the site.
6. Please revise and resubmit the Monitoring Well Water Elevations table in TR-4. It should include the minimum and maximum elevations for each well from the baseline collection period, as well as the trigger point specified in Section 4.2 of the Sampling and Analysis Plan. Additionally, please commit to using this format when submitting the water level data with the annual report.

The Division is required to issue a decision on the revision by August 9, 2025. If you cannot address the above issue before the deadline, please request an extension to the decision due date to ensure adequate time for the Division to review materials. 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.

Sincerely,



Nikie Gagnon

Environmental Protection Specialist

Ec: Joe Lamanna, RMCC
Scott Legg, Brannan
Jared Ebert, Senior EPS, DRMS