



August 5, 2025

Andy Carpenter
W.W. Clyde & Co.
10303 East Dry Creek Road, #300
Englewood, CO 80112

Re: **Bernhardt Sand and Gravel Pit, Permit No. M-2023-025, W.W. Clyde & Co.,
Technical Revision No. 1 (TR-1) Submittal of Baseline Data and Revision to
Groundwater Monitoring Plan, Adequacy Review #1**

Dear Mr. Carpenter

On July 11, 2025, the Division of Reclamation, Mining and Safety (Division) received Technical Revision No. 1 (TR-1) for the Bernhardt Sand and Gravel Pit. This revision includes the submittal of baseline groundwater data and a request to revise the approved monitoring plan. After reviewing the submittal, the Division identified the following issues that must be addressed before TR-1 can be considered for approval.

1. The SGS Technical Report provided five quarters of monitoring data for MW-2 and MW-3, but only four quarters for MW-1 and MW-4. As per the Division's Sampling and Analysis Plan Guidance (2024), a minimum of five consecutive quarters of baseline sampling are required to identify seasonal trends and site-specific variability. Please collect and submit an additional quarter of groundwater quality sampling results to the Division along with an updated spreadsheet showing the field data (pH, temperature, conductivity, ORP, turbidity) for the five quarters.
2. The data table included in TR-1 does not match the SGS Technical Report sampling data for MW-1, MW-2, MW-3, and MW-4. It appears to be a duplicate of the baseline data submitted for the Sweet Valley Pit revision submitted at the same time. Once you obtain an additional quarter of groundwater monitoring data, please revise and resubmit the data tables for the Bernhardt monitoring wells.

The current decision date for this revision is August 10, 2025. It is anticipated that additional time will be needed to collect the required data and submit the results to the Division. To allow the Division to continue reviewing TR-1, please submit a request to extend the decision date prior to August 10.



If you have any questions, please contact me by telephone at (720)527-1640 or by email at nikie.gagnon@state.co.us.

Sincerely,



Nikie Gagnon
Environmental Protection Specialist

Ec: J.C. York, J&T Consulting Inc.
Jared Ebert, DRMS