

STATE OF
COLORADO

Gagnon - DNR, Nikie <nikie.gagnon@state.co.us>

Sweet Valley and Bernhardt TR1 - 2nd Adequacy Review letters

1 message

Gagnon - DNR, Nikie <nikie.gagnon@state.co.us>

Mon, Aug 18, 2025 at 3:43 PM

To: JC York <jcyork@j-tconsulting.com>

Hi J.C.

Following up on your conversations with Patrick last week regarding the groundwater monitoring at Ogilvy, Sweet Valley and Bernhardt, please see the attached 2nd adequacy letters for the groundwater revisions. This second set of comments on Bernhardt and Sweet Valley ensures consistency in what Patrick and I are asking for at each site.

Let me know if you have any questions.

Kind regards,

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Nikie Gagnon
Environmental Protection Specialist



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

Cell: 720.527.1640

Physical: 1313 Sherman Street, Room 215, Denver, CO 80203

Address for FedEx, UPS, or hand delivery:

DRMS Room 215, 1001 E 62nd Ave, Denver, CO 80216

nikie.gagnon@state.co.us | <https://www.drms.colorado.gov>

2 attachments



Sweet Valley_M2024015_TR-1 Adequacy Review 2.pdf
257K



Bernhardt_M2023025_TR-1 Adequacy Review 2.pdf
257K



August 18, 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. The Division continues to review the submittal and identified the following additional issues that should be addressed when you resubmit the baseline groundwater data.

1. Upon reviewing the SGS laboratory data, the Division observed that the reports are incomplete, specifically noting that the report jumps from Page 1 of 59 to Page 21 of 59. Given that the SGS report specifically states, "This report shall not be reproduced, except in its entirety, without the written approval of SGS", we request that you submit the complete SGS report for all five quarters of background data as part of your response to the Division's adequacy questions.
2. The background data submitted does not represent five quarters of *consecutive* groundwater data, which is required by the Division's Sampling and Analysis Plan Guidance (2024), to determine seasonal trends and site-specific variability. Please ensure that future submittals of groundwater data, clearly label the date and quarter that each sample was collected in the tables and on the cover sheets. Additionally, please confirm that five consecutive quarters of data are included as part of TR-1. An extension to the decision date may be requested if additional time is needed to meet this requirement or the Applicant may provide a discussion using site specific data why five consecutive quarters of data are not needed for the Division's consideration.

The current decision date for this revision is October 5, 2025. If you need additional time to respond to the adequacy issues, please submit an extension request prior to the decision date.



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

cc: J.C. York, J&T Consulting Inc.

Jared Ebert, DRMS