



STATE OF
COLORADO

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

Dunn Pit M2021059- TR-1 Adequacy Review

1 message

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

Tue, Sep 9, 2025 at 3:24 PM

To: stephanief@lrnconcrete.com

Cc: Jared Ebert - DNR <jared.ebert@state.co.us>, tgerken@telesto-inc.com

Good afternoon,

Attached to this email is a pdf of the Division's Adequacy Review letter for Technical Revision (TR-1) submitted for the Dunn Pit, permit number M-2021-059.

A hard copy will not be sent unless requested. Please feel free to contact me if you have any questions.

Sincerely,

Chris Girardi

Environmental Protection Specialist



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

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TR1_AdequacyReview_DunnPit_M2021059.pdf

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

September 9, 2025

Stephanie Fancher-English
Loveland Ready-Mix Concrete, Inc.
644 N Namaqua Avenue
Loveland, CO 80537

Re: Dunn Pit, Permit No. M-2021-059
Technical Revision (TR-1)
Preliminary Adequacy Review

Dear Ms. Fancher-English:

On August 19, 2025, the Division of Reclamation, Mining and Safety (“Division” or “DRMS”) received the Technical Revision (TR-1) application for the Dunn Pit, permit number M-2021-059. Based on review of the material submitted, the Division has identified the following items must be addressed before the TR-1 application can be approved. Please submit a cover letter responding to the items listed below.

1. The Division’s Sampling and Analysis Plan Guidance (dated July 2024) states that “once site groundwater 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”. Therefore, the DRMS cannot approve the request to reduce the sampling frequency to an annual basis. DRMS notes that a reduction of sampling frequency to a semi-annual basis is acceptable. Please commit to continued monitoring on a semi-annual basis.
2. DRMS notes that during the 2024 first quarter sampling event, dissolved Aluminum was detected in MW-08 at 5.84 milligrams per liter (mg/L), exceeding the Regulation 41 standard. Please revise Table 1 to account for this exceedance. In addition, please clarify why Aluminum is not included in Table 2 as an analyte to be sampled going forward.
3. DRMS notes that during the 2024 first quarter sampling event, dissolved Iron was detected in MW-08 at 8.11 milligrams per liter (mg/L), exceeding the Regulation 41 standard. Please clarify why Iron is not included in Table 2 as an analyte to be sampled going forward.
4. The Operator states that MW-02 and MW-03 were vandalized, requiring the redrilling of both monitoring wells. Please provide the well construction reports and abandonment reports for both replacement wells.



5. DRMS accepts the request to reduce the gauging frequency to a quarterly basis. No response from the Operator is needed.

Please note the Division is required to issue a decision regarding the TR-1 application by **September 19, 2025**. If you cannot address the above issue before the decision date, please request an extension of the decision date to ensure adequate time for the Division to review materials. If any adequacy issues remain by the decision date, the Division may deny your request.

If you have any questions, please contact me by email at chris.girardi@state.co.us.

Sincerely,



Chris Girardi
Environmental Protection Specialist

cc: Tim Gerken, Telesto Solutions, inc.
Jared Ebert, DRMS