

STATE OF  
COLORADO

Lennberg - DNR, Patrick &lt;patrick.lennberg@state.co.us&gt;

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**Adequacy Review No. 2, TR-2, Parsons Mine, M2009-082**

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**Julie Mikulas** <Julie.Mikulas@martinmarietta.com>  
To: "Lennberg - DNR, Patrick" <patrick.lennberg@state.co.us>

Tue, Sep 16, 2025 at 5:45 PM

Attached is our response letter and the Exhibits. Exhibit C and Exhibit F will be submitted separately because of their size. Let me know if you do not receive them. I also wanted to add that I also changed the acres on Exhibit E page E3 to match the acres on the maps since we are now mining through many of the oil and gas easements and pad setbacks that have been plugged and abandoned.

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**From:** Lennberg - DNR, Patrick <patrick.lennberg@state.co.us>  
**Sent:** Tuesday, September 16, 2025 5:41 AM  
**To:** Julie Mikulas <Julie.Mikulas@martinmarietta.com>  
**Subject:** Re: Adequacy Review No. 2, TR-2, Parsons Mine, M2009-082

**EXTERNAL SENDER - PLEASE ASSESS AND VERIFY**

[Quoted text hidden]

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**4 attachments**

-  **DRMS TR02 Parsons response to Adeq 2 2025-09-15.pdf**  
117K
-  **Phase 2 Leak Test Approval Letter.pdf**  
164K
-  **Exhibit D and E 2025-09-15.pdf**  
559K
-  **Exhibit L Rec Costs 2025-09-15.pdf**  
63K

September 15, 2025

Mr. Patrick Lennberg  
Division of Reclamation Mining and Safety  
1313 Sherman Street, Room 215  
Denver, CO 80203

RE: M-2009-082 Response to Adequacy Review No. 2 for TR-2

Dear Mr. Lennberg:

As a follow-up to your adequacy review, please consider the following:

Item 1

The referenced SEO certification letter for Phase 2 (Cell2) liner was missing from the submittal. Please provide the SEO liner certification letter.

Response: SEO certification for Phase 2 is attached.

Item 2

The Division acknowledges that slurry walls will not be installed at the site and clay liners will be installed. Please provide the length of liner that will be installed in Phase 1A and 4A/4C. If liners have already been installed (other than Phase 2), please clearly indicate where and the length.

Response: No additional liners have been installed. We are estimating that the liner for Phase 1A will be approximately 5830 lf and the liner for Phase 4A/4C will be approximately 7170 lf. These numbers will be refined as we complete the design drawings and submit as a revision.

Item 3

On the Reclamation Plan Maps cover sheet the Reclaimed Uses table needs to be updated to clearly indicate the number of acres that will be reclaimed with the Upland Seed Mix, Transitional Zone/Water's Edge, and Wetland Areas

Response: Maps have been updated

Item 4

The Shoreline Tree and Shrub Plant list for Open Water Ponds needs to be updated with the number of trees and shrubs that are proposed to be planted per acre. The Reclamation Use table needs to be updated to clearly state the number of acres that will be reclaimed with the tree and shrub planting mixture these acres need to be clearly depicted on the associated Reclamation Plan Maps.

Response: The planting clusters have been added back onto the maps as well as the planting table. An additional column has been added for the number of each type along the shoreline. We are also re-submitting Exhibit D and E with the tree and shrub table on Page E8 revised to match what is on the maps. Please note that if a revision is submitted with a liner design, these trees will be eliminated. Tree roots compromise the integrity of the reservoir liners.

Item 5

On the Reclamation Plan Maps it is not clearly shown where clay liners will be installed. For example, the dashed line around Phase 4A/4C is like the dashed line around Phase 1B but the Legend does not define either line type. The liners around the other phases are not clearly shown either.

Response: This has been corrected on the Reclamation Plan Maps.

Item 6

Please clearly state which Phases will be backfilled, the quantity of material needed to backfill each Phase, and the type of material to be used for backfilling. If silt and fines are to be used, please state the effects, if any, the low permeable material will have on the hydrologic balance, specifically groundwater.

Response: Phase 1B, 1C, 4B and 5A/B will be first filled with silt and then with enough overburden to eliminate any open water and get them at or above the water table to create wetland. Any areas within 200'-400' of river shoreline will be backfilled to the pre-mining topography. Phase 3 will be the last mined and will only be mined if we calculate that there is enough overburden on site to fill it back up. Any excess overburden may be used to increase the number of upland acres in final reclamation for any of these cells. We are currently calculating that we need approximately 316,000 cy of silt storage to complete the remaining mining. We will then need to move the following overburden that is onsite in near proximity to the silt ponds:

Phase 1C	180,000 cy to fill clean water pond and cap south 200 feet
Phase 5A/B	45,000 cy of overburden to cap the north 200 feet

Infilling of a gravel pit with finer-grained sands and silts will result in the pit functioning as a local pocket of lower-permeability material which will restrict flow through the area but likely will not obstruct flow. Some diversion of groundwater flow around the silt pond will occur through higher permeability pathways on either side of the pond. As a result, the net groundwater budget is expected to be essentially unaffected.

Please give me a call (970-407-3631), if additional information is needed for you to complete your review.

Sincerely,



Julie Mikulas  
Regional Land Mana



**COLORADO**  
Division of Water Resources  
Department of Natural Resources

September 21, 2023

Susan A. Rainey, P.E.  
Schnabel Engineering  
600 S Airport Road, Suite A-205  
Longmont, Co 80503  
Transmission via Email: [srainey@schnabel-eng.com](mailto:srainey@schnabel-eng.com)

**RE: CLAY LINER APPROVAL  
PARSONS RESERVOIR (WDID 0303559)  
PARSONS MINE, DRMS M-2009-082 (WDID 0303045)  
SE1/4 OF SECTION 25, T6N, R67W  
WATER DIVISION 1, WATER DISTRICT 3, WELD COUNTY**

Dear Susan Rainey,

The purpose of this letter is to approve the lining of the Parsons Reservoir ("Reservoir"). The Reservoir is primarily located in the SE1/4 of Section 25, Township 6 North, Range 67 West of the 6<sup>th</sup> P.M., and is part of the Parsons Mine (DRMS M-2009-082). The Reservoir was lined with a clay liner. The clay liner leak test commenced on March 17, 2023 and concluded on August 15, 2023. A site inspection was performed by our office on June 8, 2023 to review site conditions and discuss the leak test plan.

Your report dated August 22, 2023 provides the liner summary and leak test results. The test data provided indicates that the liner meets the design standard referenced in the August 1999 State Engineer Guidelines for Lining Criteria for Gravel Pits (1999 SEO Guidelines). **Meeting the design standard requires that during reservoir operations all water inflows and outflows for the liner perimeter enclosed area be accounted for on a monthly basis.**

With this liner approval, the Parsons Reservoir is now classified as a lined reservoir in accordance with the 1999 SEO Guidelines. Water shall not be impounded in the reservoir except pursuant to lawful diversions allowed by statute or decree. At all other times, all inflow of water into the reservoir from any source, including precipitation and ground water inflows shall be removed to prevent illegal storage of water. Prior to ANY use of this site, the owner or operator will need to coordinate with Mark Simpson, District 3 Water Commissioner, to review operations, measurement structures, stage-storage curves, and accounting.

Please contact me at 303-866-3581 x8246 or [ioana.comanicu@state.co.us](mailto:ioana.comanicu@state.co.us) if you have any questions.

Sincerely,

Ioana Comanicu, P.E.  
Water Resource Engineer

Ec: Mark Simpson, District 3 Water Commissioner ([Mark.Simpson@state.co.us](mailto:Mark.Simpson@state.co.us))  
Louis Flink, Diversion Records Coordinator ([Louis.Flink@state.co.us](mailto:Louis.Flink@state.co.us))  
WDID File (0303559 & 0303045)

