WSI Weiland, Inc.
Environmental & Engineering

11/18/2025

Nikie Gagnon
Environmental Protection Specialist
Division of Reclamation, Mining and Safety
1313 Sherman Street, Room 215
Denver, CO 80203

Re: Technical Revision Application, 112c Reclamation Permit, Amen Aggregate Resource, Permit No. M-2019-025

Dear Ms. Gagnon,

On behalf of Coulson Excavating Company, Inc. ("Coulson"), this letter is requesting a technical Revision (TR-2) to the above referenced construction permit.

This TR modifies the Groundwater Quality Monitoring Report pages 6-7 to specify 3 quarters of background sampling for wells 1-5 rather than the currently specified 5 quarters. This change has been made since mining has progressed to the point where background sampling is no longer the relevant for this area.

Sincerely,

Peter Wayland

Peter Wayland
President

Encl. TR application form, Revised pages 6-7 of the Groundwater Quality Monitoring Report.

PO BOX 18087, BOULDER, CO 80308
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COLORADO DIVISION OF RECLAMATION, MINING AND SAFETY
1313 Sherman Street, Room 215, Denver, Colorado 80203 ph(303) 866-3567

REQUEST FOR TECHNICAL REVISION (TR) COVER SHEET

File No.: M- 2019-025 Site Name: Amen Aggregate Resource

County Weld TR# *(DRMS Use only)*

Permittee: Coulson Excavating Co., Inc.

Operator (If Other than Permittee): Same

Permittee Representative: Weiland, Inc.

Please provide a brief description of the proposed revision:

Update the the Groundwater Quality Monitoring Plan to specify 3 quarters of background sampling / analysis for Wells 1-5.

As defined by the Minerals Rules, a Technical Revision (TR) is: "a change in the permit or application which does not have more than a minor effect upon the approved or proposed Reclamation or Environmental Protection Plan." The Division is charged with determining if the revision as submitted meets this definition. If the Division determines that the proposed revision is beyond the scope of a TR, the Division may require the submittal of a permit amendment to make the required or desired changes to the permit.

The request for a TR is not considered "filed for review" until the appropriate fee is received by the Division (as listed below by permit type). Please submit the appropriate fee with your request to expedite the review process. After the TR is submitted with the appropriate fee, the Division will determine if it is approvable within 30 days. If the Division requires additional information to approve a TR, you will be notified of specific deficiencies that will need to be addressed. If at the end of the 30 day review period there are still outstanding deficiencies, the Division must deny the TR unless the permittee requests additional time, in writing, to provide the required information.

There is no pre-defined format for the submittal of a TR; however, it is up to the permittee to provide sufficient information to the Division to approve the TR request, including updated mining and reclamation plan maps that accurately depict the changes proposed in the requested TR.

Required Fees for Technical Revision by Permit Type - Please mark the correct fee and submit it with your request for a Technical Revision.

Permit Type	**Required TR Fee**	**Submitted** (mark only one)
110c, 111, 112 construction materials, and 112 quarries	$216	☑
112 hard rock (not DMO)	$175	☐
110d, 112d(1, 2 or 3)	$1006	☐

3.3 SAMPLING PLAN

3.3.1 Background Water Quality

For the purpose of establishing background water quality***, 3-5 quarters*** of background sampling (quarterly) and 5 quarters of monthly water level measurements will be performed on *all* monitor wells following installation. Following the initial 3-5 quarters, water quality will be monitored as directed by DRMS described below in **Section 3.3.2. Continued Monitoring and Compliance**. Water levels will be monitored monthly for the duration of the permit.

For monitoring the potential effects of mining and reclamation on groundwater in the vicinity of Cells 2, 3, 4 and 6, monitor wells 1-5 were installed on 7/17/23 -7/18/23.

Similarly, for monitoring the potential effects from Cell 5 and Cell 1, monitor wells 6, 7, 8, 9, and 10 will be installed a minimum of 15 months prior to any mining activity in those areas east north of the Big Thompson River. It is felt that the installation of these wells at that time is appropriate since the areas will not be mined for approximately 10+ years. Cell 5 occurs north of the river and Cell 1 occurs east of the river. The river serves as a hydrologic divide between these Cells and Cells 2, 3, 4 and 6. The groundwater upgradient of Cells 1 and 5 is also subject to different bedrock and land use. Additionally, timing background monitoring closer to the time of mining will provide a better picture of water chemistry and levels relative to the potential effects of mining at that future time.

Coulson Excavating Co., Inc. (CEC) will commit to not mining Cell 1 and Cell 5 until at least 5 quarters of background sampling and 5 quarters of monthly water levels have been completed.

Sampling will begin immediately following well construction and development. Sampling methodology will be to purge 3 times the water column volume followed by sampling with a dedicated bailer. Samples will be placed in analytical laboratory sampling vessels and sealed with a chain of custody. Field water quality parameters will include water level, pH, temp, and specific conductivity. All field meters shall be regularly calibrated.

At the time of sampling for inorganic analytes, appropriate filtering, preservation and or maintenance of temperature parameters will be followed as directed by the analytical laboratory. These procedures will be documented in the field logs.

Water quality samples will be delivered (not to exceed holding times or temperatures) to a reputable analytical laboratory certified for current EPA standards and methodologies.

A field logbook will be developed and will include date, time, purge method and volume, temp. pH, specific conductivity, samples collected, filtering information, preservation,

instrument calibration data and other pertinent data as needed for each sampling event.

A Background Water Quality and Water Level Monitoring Summary Report will be submitted to the DRMS with the annual report by the end of the 2024 calendar year. A Water Level Monitoring Summary Report will be submitted with the annual report for 2023.

3.3.2 Continued Monitoring and Compliance

A Technical Revision (TR) will be submitted following the completion of the 3 quarters of monitoring and water level measurement for wells 1-5. Another TR will be submitted following the completion of 5 quarters of the same for wells 5-10. The TR's will contain a baseline data report, comparisons to the Table Value Standards, surveyed monitoring well locations and elevations, construction diagrams, and an updated groundwater contour map.

Following submittal of the TR's, DRMS will evaluate the 3 and 5 quarters of data and constituents identified as exceeding table value standards in baseline data. Permit-specific benchmarks will be set by DRMS for those constituents identified as exceeding table value standards in baseline data, as wells as sampling and reporting requirements for continued monitoring. Reporting requirements and follow-up actions for observed exceedances of either groundwater level or quality benchmarks will be specified and approved in these revisions.

The continued water quality monitoring will utilize the same standards, methodology and documentation as identified in **Section 3.3.1 Background Water Quality** above.

At a minimum, Water Quality and Water Level Monitoring Summary Reports will be submitted to the DRMS annually with the annual report. It is noted that they may need to be submitted more frequently as described above.