

COLORADO DIVISION OF RECLAMATION, MINING AND SAFETY COAL PROGRAM INSPECTION REPORT



PERMIT INFORMATION

Permit Number: C-1981-010 Mine Name: Trapper Mine

Operator: Trapper Mining, Inc.

Operator Address: Mr. Forrest Luke P.O. Box 187 Craig, CO 81626

County: Moffat

Operation Type: Surface Permit Status: Active Ownership: Federal

Operator Representative Present:

Graham Roberts

Operator Representative Signature: (Field Issuance Only)

INSPECTION INFORMATION

Inspection Start Date: November 20, 2013 **Inspection Type:** Coal Complete Inspection

Inspection Start Time: 07:45

Inspection End Date: November 21, 2013

Inspection End Time: 12:45

Inspection Reason: Surety Related

Weather: Cloudy

Joint Inspection Agency: Joint Inspection Contacts:

OSM

Colorado State Land Board

Christine Belka and Spencer Shumate with OSM.

Jerod Smith, Colorado State Land Board.

Post Inspection Agency: Post Inspection Contacts:

Christine Belka and Spencer Shumate with OSM. **OSM** Jerod Smith, Colorado State Land Board. Colorado State Land Board

Inspector's Signature: Signature Date: Inspector(s):

Jared L. Ebert Janel Ebeth

November 26, 2013

Inspection Topic Summary

NOTE: Y=Inspected N=Not Inspected R=Comments Noted V=Violation Issued NA=Not Applicable

Y - Air Resource Protection

R - Availability of Records

R - Backfill & Grading

R - Excess Spoil and Dev. Waste

R - Explosives

Y - Fish & Wildlife

R - Hydrologic Balance

R - Gen. Compliance With Mine Plan

NA - Other

NA - Processing Waste

Y - Roads

R - Reclamation Success

R - Revegetation

NA - Subsidence

Y - Slides and Other DamageY - Support Facilities On-site

Y - Signs and Markers

 ${\bf N}{\bf A}\,$ - Support Facilities Not On-site

NA - Special Categories Of Mining

Y - Topsoil

COMMENTS

This was a complete inspection combined with a bond release inspection of the Trapper Mine; DRMS Permit No. C-1981-010, operated by Trapper Mining, Inc. I, Jared Ebert of the Colorado Division of Reclamation, Mining and Safety (Division) conducted the inspection. Ms. Christine Belka and Mr. Spencer Shumate with the Office of Surface Mining (OSM), Jerod Smith the with the Colorado State Land Board accompanied me during the inspection. Mr. Graham Roberts with Trapper Mining, Inc. (TMI) also accompanied us during the inspection. The bond release request associated with this inspection is the SL15 bond release application. The inspection of the bond release area took place on Wednesday November 20th. It had rained and snowed in the Craig area prior to the inspection and was partly cloudy on Wednesday. The Division completed the inspection of the site on Thursday November 21st, it was snowy and cold at that time.

AVAILABILITY OF RECORDS – Rule 5.02.4(1):

The Division conducted an inspection of the records for the Trapper Mine on Thursday, November 21st. Details of the Division's findings are located at the end of this report.

BACKFILL and GRADING - Rule 4.14

Contemporaneous Reclamation 4.14.1; Approximate Original Contour 4.14.2; Highwall Elimination 4.14.1(2)(f); Steep Slopes 4.14.2, 4.27; Handling of Acid and Toxic Materials 4.14.3; Stabilization of Rills and Gullies 4.14.6: Concurrent backfilling and grading was occurring at the time of the inspection.

See the reclamation success section of the report for a discussion of the Phase I bond release evaluation.

EXCESS SPOIL and DEVELOPMENT WASTE - Rule 4.09

Placement; Drainage Control; Surface Stabilization:

The Horse Gulch Fill was inspected. The face of the fill was covered in snow, however large depressions and slumps were not observed. The side drains appeared to be clear and functional.

EXPLOSIVES - Rule 4.08

Distance Prohibitions 4.08.4; Warnings 4.08.4; Control of Adverse Effects 4.08.4:

Number of <u>Partial</u> Inspection this Fiscal Year: 3 Number of Complete Inspections this Fiscal Year: 2 A blast pattern was in the process of being drilled at the time of the inspection. However a blast did not occur during the inspection.

HYDROLOGIC BALANCE - Rule 4.05

Drainage Control 4.05.1, 4.05.2, 4.05.3; Siltation Structures 4.05.5, 4.05.6; Discharge Structures 4.05.7, 4.05.10; Diversions 4.05.4; Effluent Limits 4.05.2; Ground Water Monitoring 4.05.13; Surface Water Monitoring 4.05.13; Drainage – Acid and Toxic Materials 4.05.8; Impoundments 4.05.6, 4.05.9; Stream Buffer Zones 4.05.18:

No Name Pond #5 was holding water and discharging. The embankment was stable and vegetated. The primary and emergency spillway was clear and functional.

Culverts; D-19, D-18, D-17, D-16 were clear and functional. The Division could not locate culvert D-12 likely due to the snow cover over the affected area.

Impoundment H was holding a small amount of water but was not discharging. The primary spillway was clear and functional.

West Pyeatt Pond #1 was holding water but did not appear to be discharging. Pond #2 was not holding water and was not discharging. The embankments for these ponds appeared stable and the primary and emergency spillways were clear and functional.

Culverts A-2 and SAH-1 were clear and functional.

Middle Pyeatt Pond #1, 2 and 3 were observed. These ponds were not holding water or discharging. The embankments appeared stable and the primary and emergency spillways were clear and functional.

East Pyeatt Ponds #1 was recently cleaned out. For Pond #1, 2, and 3 The primary and emergency spillways were clear and functional and the embankments were stable. All of the ponds were holding water but only pond #2 and 3 were discharging.

Grouse Ponds #1 was holding water but not discharging. Pond #2 was not holding water and was not discharging. The primary and emergency spillways appeared stable and the embankment was stable.

Sage Ponds #1 and 2 were not holding water and were not discharging. The primary and emergency spillways were clear and functional.

Oak Ponds #1 and 2 were holding water and were not discharging. The embankment was stable and vegetated. The primary and emergency spillways were clear and functional.

West Flume Pond was inaccessible at the time of the inspection.

Middle Flume Pond No. 3 was holding water but was not discharging. The embankment was stable and the primary and emergency spillway was clear and functional. Sediment marker was in place.

Number of <u>Partial</u> Inspection this Fiscal Year: 3 Number of Complete Inspections this Fiscal Year: 2 East Middle Flume Pond was holding water and not discharging. The embankment was stable and vegetated. The primary and emergency spillway was clear and functional.

East Flume Pond was not holding water and was not discharging. The primary and emergency spillway was clear and functional. The embankment was stable and vegetated.

Coyote Pond was holding water and not discharging. The embankment was stable and vegetated. The primary and emergency spillway was clear and functional.

Far East Buzzard pond was not discharging. The embankment was stable and the primary and emergency spillway was clear and functional.

Horse Gulch pond was holding water but did not appear to be discharging. The embankment was stable and the primary and emergency spillway was clear and functional.

Ute, West Horse and Deal ponds were inaccessible due to the mud and snow conditions.

GENERAL MINE PLAN COMPLIANCE:

At the time of the inspection, the Queen Anne and Molly Brown Dragline were operating in the K and L pit areas. The Baby Doe dragline was inactive. Also, a truck and loader crew as well as an excavator and truck crew was operating. Concurrent backfilling was occurring.

RECLAMATION SUCCESS - Rule 4.15, Rule 3:

As indicated above, this was also a bond release inspection. TMI submitted a phase I bond release request (SL15) on September 30, 2013. The bond release area encompasses three parcels; A-B-13, 15.6 acres, K-A-13, 29.4 acres and Z-A-13, 75.4 acres. The Division evaluates reclamation success for phase I bond release based on the criteria required by Rule 3.03.1(2)(a). The Division's document titled, "Guideline Regarding Selected Coal Mine Bond Release Issues", dated April 18, 1995 provides a list of criteria to evaluate for a phase I bond release inspection:

- i. Hillslope and drainage channel gradients and general design compliance;
- ii. Performance of the reconstructed topography. Symptoms of failure or instabilities such as slumping or exposed highwalls were examined;
- iii. Hillslope design/function with regard to erosion;
- iv. Swales and depressions with regard to numbers of features and effect on post-mining land use:
- v. Blending of regraded land to undisturbed areas;
- vi. The functioning of drainages with regard to knickpoints, blending at disturbance boundaries and channel erosion;
- vii. Erosional features; and
- viii. Drainage control for the reclaimed area, including upslope diversions.

Number of <u>Partial</u> Inspection this Fiscal Year: 3 Number of Complete Inspections this Fiscal Year: 2 During the October 24, 2013 site inspection, the Division evaluated hillslope gradients and design compliance. Please see that report for details. Overall, it appears the Operator has backfilled and graded the bond release parcels in accordance with the approved post mining topography. During this inspection the Division walked each of the bond release parcels. Slope failures and instabilities such as slumping or exposed highwalls were not observed on any of the parcels. Large erosional features were not observed, only minor rills could be seen which are typical for areas that are beginning to established vegetation. Large swells and depressions were not observed. Each of the bond release parcels blends in well with the surrounding backfilled and graded areas and undisturbed areas. Large surface diversions or reconstructed channels were not included within the bond release area. However, a small portion of a tributary to Oak Gulch is within the Z-A-13 bond release parcel. This small drainage topographic feature was stable at the time of the inspection. Each of the bond release parcels has positive drainage and the runoff from the parcels reports to a system of sediment control impoundments.

REVEGETATION – Rule 4.15 Vegetative Cover; Timing: Trapper has seeded parcels A-B-13, Z-A-13 and K-A-13.

PHOTOGRAPHS



Parcel A-B-13



Parcel Z-A-13



Parcel A-B-13



Small tributary to Oak Gulch



Parcel Z-A-13; top right snow covered land.



Parcel K-A-13

Number of <u>Partial</u> Inspection this Fiscal Year: 3 Number of <u>Complete</u> Inspections this Fiscal Year: 2

AVAILABILITY OF RECORDS

PERMIT RECORDS		HYDROLOGIC RECORDS	
DRMS Permit	Exp. 12/31/2017	NPDES Permit	Exp. Oct 31, 2017
Permit Application w/Revisions	Yes	NPDES Records	3Q 2013
Findings Document	*1	Stormwater Management Plan	NA
Insurance Certificate	Exp. 10/1/2014	SPCC Plan	June, 2013
Bond Document	*2	MSHA Pond Inspections	July 2013
Phased Bond Release	SL12 and SL13	-	NA
Documents/Findings		State Engineer's Pond Inspection	
Air Emission Permits	*3	Quarterly Pond Inspections	3Q 2013
County Special Use Permits	Yes	Annual Hydrology Reports	2012
UG Mining Landowner Notification	NA	 Ground Water Monitoring 	Yes
Subsidence Monitoring Reports	NA	 Surface Water Monitoring 	Yes
Subsidence Monitoring Data	NA	 Spring & Seep Monitoring 	Yes
Rill & Gully Survey	2012 ARR	 Mine Water Discharge Monitoring 	Yes
Vegetation Monitoring Data	2012 ARR	Mine Inflow Study	NA
Specific Variance Approvals	NA	Water Consumption Records	Yes
Annual Reclamation Reports	2012 ARR	Well Permits	*6
Midterm Review Documents	*4	VV CIT I CITINGS	
DRMS/OSM Inspection	YES – DRMS to		
Reports/Enforcement Actions (3	Oct. 24, 2013,		
Years)	OSM – 2 May		
,	2012	BLASTING RECORDS	
Transfers/Succession of Operator	NA	Blasting Publication	March 6, 2013
Temporary Cessation Notification	NA	Blasting Records (3 years)	Yes
Reclamation Cost Estimate	RN6	ATFE Explosives Permit	Exp. Apr 1, 2014
CERTIFICATIONS		Blasting Variances	NA
Pond Certifications	Yes	Pre-Blast Surveys	NA
Annual Certifications for Impoundments	July 23, 2013		
Fill Certifications for Excess Spoil or Underground Development Waste	Sep 2013, Report	ADDITIONAL RECORDS (specify)	
Quarterly Inspections	3Q 2013	County Ash Disposal	2012 TRI Report
Compaction Testing	NA	GeoTech Monitoring Report	Sep 2013
• Final Certification	NA		
Coal Processing Waste Banks	NA		
Haul Road Certifications	Yes		
Access Road Certifications	*5		
COMMENTS: 1.) Findings RN6 and SL12 and SL13.			
2.) Bond is currently \$30,173,724.00. Document number: 64S100739153BCA			
3.) Permits 11 MF523-1 (Mining and Ash Disposal), C-11,253 (Coal Stockpile – Not used)			
4.) See MR-215 decision form.			
5.) Map M52 is part of certification			
6.) Well Permit Number 019872-F			

Number of <u>Partial</u> Inspection this Fiscal Year: 3 Number of <u>Complete</u> Inspections this Fiscal Year: 2