



STATE OF
COLORADO

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Seneca II-W Mine, C-1982-057, 2016 ARR Review Letter

1 message

Musick - DNR, Jason <jason.musick@state.co.us>
To: Jerry Nettleton <jnettleton@peabodyenergy.com>

Mon, May 1, 2017 at 8:07 AM

Good morning Jerry,

Attached is the Division's review of the 2016 ARR associated with the Seneca II-W Mine.

Please let me know if you have any questions or comments.

Thanks,
Jason

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Jason Musick
Environmental Protection Specialist III
Coal Regulatory Program



COLORADO
Division of Reclamation,
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2016ARR_Review.pdf
152K



COLORADO

Division of Reclamation,
Mining and Safety

Department of Natural Resources

1313 Sherman Street, Room 215
Denver, CO 80203

May 1, 2017

Jerry Nettleton
Seneca Property, LLC
29515 Routt County Road 27
Oak Creek, CO 81467

**RE: Seneca II-W Mine (Permit No. C-1982-057)
2016 Annual Reclamation Report Review**

Dear Mr. Nettleton,

The Division has completed its review of the above referenced report received on 22 March 2017. The Division finds the 2016 Annual Reclamation Report in compliance of the following Rules:

Rule 2.04.13(1) - Received 22 March 2017. The Annual Reclamation Report is required to be received by the Division by February 15 or other date to be approved by the Division. As a permit requirement, the Seneca II-W Mine ARR is required to be submitted to the Division by March 30.

Rule 2.04.13(1)(a) - The cover of the ARR includes the name of the permittee, the address, and the permit number.

Rule 2.04.13(1)(b) - The ARR identifies 0.00 disturbed acres disturbed during calendar year 2016.

Rule 2.04.13(1)(c) - The ARR identifies 0.00 new backfilled and graded acres during calendar year 2016.

Rule 2.04.13(1)(d) - The ARR identifies 0.00 new topsoiled acres during calendar year 2016.

Rule 2.04.13(1)(e) - The ARR identifies 0.00 acres which were permanently revegetated during calendar year 2016.

Rule 2.04.13(1)(f) - The ARR identifies 0.00 acres which were seeded during calendar year 2016.

Rule 2.04.13(2) - The following additional information was provided in accordance with the approved PAP: History of soil stockpile volumes, history of vegetation sampling and monitoring, weed control information, grazing information, history of pond surveys, and wildlife monitoring.



Please address the following concerns as necessary (please note that these adequacy items were identified in the 2014, 2015, and now the 2016 ARR reviews by the Division):

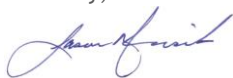
1. During a review of the 2014 ARR, the Division identified a number of discrepancies associated with the Chronologic Seeding Map. These discrepancies are noted as:
 - The Parcel east of PD-11, and PM-4A, PM-4B, and PM-4C, is shown as having been seeded in 2002. In 2014, Seneca Property conducted significant repairs to drainage PD-4D. While these repairs did not redisturb the entire parcel, the area that was reconstructed underwent significant redisturbance. The area of the repairs need to be depicted on the map with the corrected seeding year for the repaired portion of the parcel.
 - The parcel located immediately to the east of Pond 016. Seneca Property personnel submitted photos to the Division, dated October 9, 2013, documenting seeding with the perennial seedmix for this parcel. The Division considers that the 2014 Chronologic Seeding Map should note this parcel as having been seeded in 2013. The map submitted to DRMS with the 2014 ARR, denoted this parcel as "0", indicating that it had not been seeded at the end of 2014.
 - Stock tank T-22 should be included within the disturbance area boundary on the north side of Haul Road G.

These discrepancies have not been addressed and the Chronologic Seeding Map submitted with the 2016 ARR is a copy of the 2014 ARR map of which the errors were noted. Please submit a 2016 ARR Chronologic Seeding Map that depicts the correct areas that have been seeded to date through 2016.

2. During 2014 the Division reviewed Seneca Property's GIS database. The Division concurred that the corrected Phase I bond released acreage should be 1,270.4, the corrected Phase II bond release acreage should be 797.8, and the total disturbed acreage should be 1,291.5. In addition, page 5 of the 2015 ARR identifies a total of approximately 798 acres that have been Phase II released. However, the 2015 ARR form identifies 800.9 acres of Phase II bond release. Please provide information as to the change in corrected Phase II released acres from the 2014 ARR to the 2016 ARR.

Please feel free to contact me with any questions.

Sincerely,



Jason Musick

Environmental Protection Specialist

Jason.musick@state.co.us