



COLORADO

Division of Reclamation,
Mining and Safety

Department of Natural Resources

1313 Sherman Street, Room 215
Denver, CO 80203

April 25, 2017

Interoffice Memo

King Coal Mine (Permit No. C-1981-035)

Renewal No. 7 (RN-7)

Rob,

After reviewing the King Coal Mine's PAP as requested for applicable geotechnical engineering items, I have the following comments:

1. Map King I-007 shows a proposed West Waste Bank which is detailed within TR-20. To my knowledge, TR-20 has not yet been approved and should not be detailed in the PAP including Map King I-007. Please have GCC update Map King I-007 showing only approved structures and features associated with the mine.
2. In Section 2.05.3, page 2 under "Mine Waste Rock Disposal, GCC includes discussion of the approximate waste stored within the waste bank up to the date of June 2012. Please have GCC update this statement with current approximate waste stored within the waste bank. While it appears highly unlikely for the mine to have exceeded the designed waste capacity for the pile, keeping tabs of the current stored waste amount is useful.
3. Per your email dated April 20, 2017, you mentioned potential textual implication issues regarding final configuration of the waste pile in the text under Section 2.05.4. After reviewing the statement, I would agree that the text is worded in a manner which comes off confusing. I believe their intent was to state that they plan on "shaping" the waste pile to meet a similar configuration to that of the approved maximum designed storage regardless of if they meet that storage amount. I see no geotechnical issues with this however, for clarification, I believe this statement can be worded different to reduce confusion.
4. On Map King I-015, the map appears to be labeled as "Preliminary". Given that this map is the approved design of the waste pile as well as access road profile and other associated typical sections, the "Preliminary" label should not be on the map. If necessary, please have GCC update Map King I-015 without the "Preliminary" label.

Overall, there are no current geotechnical issues regarding the King Coal Mine's PAP. All waste pile and subsidence monitoring reports have been received within the approved time with all information required present in the reports. On a side note, the mine is required to submit compaction results from the waste pile once every two years. The last compaction report for the



Name of Addressee

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Date

King Coal Mine was April 2015 and new compaction results should be submitted this year as per the approved Appendix 10(1) – Waste Bank Design Summary Report.

This concludes my review of the King Coal Mine's PAP. If you have any questions, feel free to contact me at any time.

Sincerely,

A handwritten signature in black ink, appearing to read 'ZTJ' with a stylized flourish at the end.

Zach Trujillo
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