



TRI-STATE GENERATION AND TRANSMISSION ASSOCIATION, INC.

HEADQUARTERS: P.O. BOX 33695 DENVER, COLORADO 80233-0695 303-452-6111

May 9, 2017

RECEIVED

MAY 10 2017

**DIVISION OF RECLAMATION
MINING AND SAFETY**

Mr. Brock Bowles
Environmental Protection Specialist
Colorado Division of Reclamation, Mining and Safety
1313 Sherman Street, Room 215
Denver, CO 80203

**RE: New Horizon North Mine
Permit No. C-2010-089
TR-15 Adequacy Review Response**

Dear Mr. Bowles:

Tri-State Generation and Transmission Association (Tri-State) has received your adequacy review letter for TR-15, dated April 10, 2017 and provides the following responses to your comments on behalf of the Elk Ridge Mining and Reclamation's New Horizon North Mine.

2.05.3(4) - Ponds, Impoundments, Other Treatment Facilities and Diversions

- 1) Page 5 was submitted with the revision application for addition into the permit. The discussion at the top of page 5 is inconsistent with the last sentence on the preceding page 4 already in the permit. Please address the discussion on page 5 so it is consistent with the rest of the section already in the permit.*

Response: Page 4 has been updated to include the changes proposed by this application and be consistent with the rest of the section. Page 5 is no longer applicable to this application.

Also included with this adequacy response package are materials revised in response to your adequacy comments and a change of index sheet to ease incorporation of this material into the permit document. If you have any questions regarding the enclosed adequacy review responses, please contact Tony Tennyson at (970) 824-1232 or tennyson@tristategt.org.

Sincerely,

Daniel J. Casiraro
Senior Manager
Environmental Services

DJC:JS:der

Enclosures

cc: Frank Ferris (via email)
Chris Gilbreath (via email)
Jason Storey (via email)
Tony Tennyson (via email)
File: G474-11.3(21)c-4

AN EQUAL OPPORTUNITY / AFFIRMATIVE ACTION EMPLOYER

A Touchstone Energy* Cooperative



CRAIG STATION
P.O. BOX 1307
CRAIG, CO 81626-1307
970-824-4411

ESCALANTE STATION
P.O. BOX 577
PREWITT, NM 87045
505-876-2271

NUCLA STATION
P.O. BOX 698
NUCLA, CO 81424-0698
970-864-7316

CHANGE SHEET FOR PERMIT REVISIONS, TECHNICAL REVISION, AND MINOR REVISIONS

Mine Company Name: New Horizon North Mine

Date: May 9, 2017

Permit Number: C-2010-089

Revision Description: TR-15 Modifications to
PMT & 2nd Park Lateral Pipeline Location

Volume Number	Page, Map or other Permit Entry to be REMOVED		Page, Map or other Permit Entry to be ADDED		Description of Change
1	N/A		N/A		No changes
2	N/A		N/A		No changes
3	Section 2.05.3(4): Ponds, Impoundments, Other Treatment Facilities and Diversions, pg. 4-5 (2 pages)		Section 2.05.3(4): Ponds, Impoundments, Other Treatment Facilities and Diversions, pg. 4 (1 page)		Updated narrative to address 2nd Park Lateral ditch relocation
4	N/A		N/A		No changes

dewatering is required, the anticipated dewatering rate will be in the range of one to two cubic feet per second or less. Direct pit pumping into Pond NHN-001 or NHN-002 is planned for the mining south of Meehan Draw and into Pond NHN-003 for the mining north of Meehan Draw. Actual water flow velocity going into ponds will be controlled with adequate erosion control (i.e., rock riprap, geotextiles, synthetic liner, half-culverts, etc.) or discharged onto non-erodible bedrock material. This will minimize erosion of the pond banks.

Pit dewatering will have an insignificant impact on the ponds. Pit dewatering will be sporadic versus continuous. The flow rate of one to two cubic feet per second or less compared to the designed 10-year, 24-hour peak inflow rate the ponds were designed for is relatively insignificant. Monitoring for rills and gullies on the pond slopes will be carried out on a periodic basis; the monitoring being geared to those periods after spring snow melt and during required quarterly pond inspections. Occurrence of excessive rills and gullies will result in implementation of necessary maintenance. Remedial action on pond slopes will extend as far down the slopes as equipment access allows.

Design Methodology

Appendix 2.05.3(4)-1 includes the methodology used for the initial pond designs. Pond NHN-002 has been redesigned, with all details included in Appendix 2.05.3(4)-8.

Special Features

Temporary Relocation for CC Company Second Park Lateral Ditch

The Colorado Cooperative Company has operated an irrigation ditch known as the Second Park Lateral Ditch to irrigate lands in the area for many decades. With the mining of the Garvey property, this ditch has been diverted. Since the temporary diversion route involves rises and dips, a pipeline has been used. Map 2.04.7-9 2nd Park Lateral Pipeline Location, shows the location of the pipeline's temporary route and the permanent relocation. As per the successful experience at NH2 Mine, a high density polyethylene (HDPE) pipeline was installed for the temporary route and will also be utilized for the permanent route. Although expensive, NHN believes this design will best suit the long term needs of the CC Ditch Company.

Prior to construction, NHN evaluated multiple temporary diversion routes for the pipeline. The route that was selected begins at the eastern mine permit boundary and follows County Road 26.50 south then turns to the west around the mine permit boundary parallel to County Road AA and then turns north along County Road 26.00 Road to tie into the existing ditch. Once mining moves north of the Garvey property and the area is restored to its approximate original contour, the temporary line can be moved into the permanent location.