



COLORADO

Division of Reclamation,
Mining and Safety

Department of Natural Resources

1313 Sherman Street, Room 215
Denver, CO 80203

Louis Head
New Elk Coal Company, LLC
12250 Hwy 12
Weston, CO 81019

October 4, 2018

Re: New Elk Mine (Permit No. C-1981-012), TR-73 Adequacy

Dear Mr. Head:

I asked Leigh Simmons in my office to assist me with reviewing your TR-73 application, which is a proposed reduction in the New Elk Mine groundwater monitoring plan. Leigh is an expert in groundwater hydrology.

We have the following adequacy items that NECC must address before we can approve this TR:

1. Minor changes should be made to the proposed language used in the footnote to Table 27, and in the text of pages 109 and 109a. We suggest the following: *"Monitoring of the wells is suspended while the mine remains inactive, but the full monitoring program will be resumed prior to any resumption of mining."*
2. NE-1-10 (which is completed in the Allen seam, approximately 1000' from existing mine workings, down the projected potentiometric gradient) should be excluded from the reduced monitoring requirements, and monitoring of this well should be conducted in the near future. Any historical data from this well should be included in future AHRs as well as data from the current monitoring period.

Please feel free to contact me with any questions or comments.

Regards,

Robert D. Zuber, P.E.
Environmental Protection Specialist II

