



"Safety as a Value"

Telephone: 970.385.4528
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GCC Energy, LLC
6473 County Road 120
Hesperus, CO 81326

March 20, 2019

State of Colorado
Division of Reclamation, Mining & Safety
1313 Sherman St., Room 215
Denver, CO 80203

Attn: Brock Bowles, Environmental Protection Specialist

Re: GCC Energy, LLC, King II Mine
CDRMS Permit # C-1981-035
Technical Revision No. 27 (TR-27)

- Reconfigure Parts of the Existing, Permitted Refuse Pile

Completeness Review Response 1

Mr. Bowles:

In response to your letter of December 11, 2018, please find responses below to each item of concern (*shown in italics*) as listed in your letter. **GCC Energy responses are show in bold text.**

1. DRMS 12/11/18: The cover letter states that Map King I-007 is enclosed in the application. A paper version of this map was not included in the application. Please submit a paper version of this map for review.

GCCE March 20, 2019: A paper version of Map King I-007 is included with this submittal.

2. DRMS 12/11/18: The currently approved map in the permit with the name "Map King I-007A" contains the as-built plans for the east and west sediment ponds. The map submitted with the TR-27 application with the same name shows the haul road details. Please rename the haul road map to avoid confusion.

GCCE March 20, 2019: The haul road detail map has been renamed "Map King I-007B".

3. DRMS 12/11/18: Map King I-007A submitted in the TR-27 application is on an 8"x11" sheet of paper. The font on the map is too small to read and therefore illegible. Please submit a larger version of this map that meets the standards of Rule 2.10.1.

GCCE March 20, 2019: The haul road detail map, "Map King I-007B" has been reformatted to 42" x 28" to enhance legibility. It is included with this submittal.

4. DRMS 12/11/18: The SedCad modeling data that was used to design the ditches in TR-27 was not submitted in the application. This data is needed for the review process to verify appropriate ditch and culvert sizing (Rules 2.05.3(4)(a) and (d) and 4.05.3). Please submit the SedCad data that was used to design the ditches and culverts associated with this revision.

GCCE March, 2019: SedCad modeling data that was used to design the ditches and culverts associated with TR-27 is included with this submittal as Appendix 10(4B).

5. DRMS 12/11/18: Cross sections of the proposed changes to the coal mine waste bank were not included in the TR-27 submittal and are required according to Rule 2.05.3(8)(a)(i)(B). Please submit cross section of the proposed waste bank.

GCCE March 20, 2019: Cross sections of the proposed changes to the coal mine waste bank are included with this submittal as "Map King I-007C".

6. DRMS 12/11/18: Stoner Engineering & Surveying on behalf of GCC conducted an engineering report (the Report) for the King Coal Waste Bank Expansion (the Expansion). However, there is no indication that the provided engineering report was certified by or under the supervision of a qualified registered professional engineer as required by Rule 2.05.3(8)(a)(ii)(A). Please submit an engineer certified version of this report.

GCCE March 20, 2019: An updated and certified engineering report by Stoner Engineering & Surveying, which supersedes the original submittal report, is included as Appendix (4) with this submittal.

7. DRMS 12/11/18: As stated in the Report, material properties of the waste material associated with the Expansion were evaluated by Trautner Geotech LLC and are included as part of the submittal as Appendix 10(4A). Appendix 10(4A) was not provided with the application. Additionally, the Report states a stability analysis was performed, however no analysis was provided for the Division's review. The stability analysis should provide the results associated with the waste bank that meet the requirements of Rule 4.10 as well as provide the parameters used in the analysis. Please submit this missing data.

GCCE March 20, 2019: Appendix 10(4A), "Slope Stability Analysis, Proposed National King Coal I Mine Waste Storage Pile, La Plata County Colorado"; Trautner Geotech LLC, dated 12/26/2018 is included with this submittal.

8. DRMS 12/11/18: As per Rule 2.10.3(2), maps included in the permit application shall be prepared by or under the direction of, and certified by, a qualified registered professional engineer or geologist. The maps provided in TR-27 were not certified by a qualified registered professional engineer. Please resubmit the maps with an certified engineer stamp.

GCCE March 20, 2019: All maps from the original TR-27, as well as any additional maps included with this submittal, have been updated and are certified by a qualified registered professional engineer.

9. DRMS 12/11/18: A discussion about the reclamation plan for the waste pile was not included in the TR-27 application as required by Rule 2.05.4. Topics that need to be addressed include (but are not limited to): topsoil storage and redistribution and waste pile cover material. Also, a letter from the landowner authorizing the changes proposed in TR-27 is required by Rule 2.05.5(1)(b).

GCCE March 20, 2019: Section 2.05.4 has been revised to include a discussion of the reclamation plan for the lower waste pile. The new and/or revised pages are included with this submittal. A letter from the landowner, Huntington Ranches, LLC, authorizing the changes proposed in TR-27, is included as Appendix 2(6).



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Please find enclosed 2 copies each of:

- King I PAP Cover Page
- King II Table of Contents pages ii, iii & iv
- King II Section 2.05.4 pages 5 & 11
- Appendix 10(4) Engineering Report by Stoner Engineering & Surveying
- Appendix 10(4A) Geotechnical Report by Trautner Geotech LLC
- Appendix 10(4B) SedCad Modeling Results
- Appendix 2(6) Letter from Huntington Ranches, LLC
- Map King I-007 (TR-27) Operation Plan & Surface Features
- Map King I-007B (TR-27), Road Design Detail
- Map King I-007C (TR-27), Cross Section Views – Lower Refuse Pile
- Map King I-011 (TR-27), Final Contour Map

Please contact Tom Bird at 970.385.4528 x 6503 or Joel Riggins at x 6540 with questions or comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tom Bird', with a large, stylized loop at the end.

Tom Bird
Manager of Coal Services
GCC Energy, LLC
tbird@gcc.com