

## **Colorado Division of Reclamation, Mining and Safety**

To: Rob Zuber

From: Zach Trujillo

CC: Jason Musick

Date: May 3, 2019

Re: King Coal Mine TR-27

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As requested, I have reviewed King Coal Mine's (King) provided material associated with TR-25 in comparison to the Rules and have the following adequacy comments.

### **2.05.3 – Operation Plan – Permit Area**

#### **2.05.3(8) - Coal Mine Waste and Non-Coal Processing Waste**

This rule requires a narrative explaining the construction, modification, use, maintenance, removal, and reclamation of coal processing and non-coal waste removal, handling, storage, transportation and disposal areas and structures in the permit area. A general plan discussion regarding the proposed lower refuse pile expansion under TR-27 is found under the proposed Appendix 10(4) [the Report]. However, the main discussion regarding rule 2.05.3(8) is found under KI 2.05.3 of King I PAP for the current operations. Please have this section updated to include discussion regarding the lower refuse pile expansion proposed under TR-27.

### **4.03 - Roads**

#### **4.03.1 - Haul Roads**

The profile of the proposed haul road expansion has been provided under Map King I-007B which meets all requirements found under this rule. However, the proposed profile only shows the proposed section of the haul road expansion and there is no profile provided for the current haul road that is being extended to. Please have King provide a profile for the entirety of the haul road on Map King I-007B as well as update Map King I-007 showing the corresponding transect.

All other information required under these rules have been met.

### **4.10 - Coal Mine Waste Banks**

#### **4.10.1 – General Requirements**

Per 4.10.1(1)(a), coal mine waste banks must be constructed in accordance to 4.09.1 and 4.09.2.

- **4.09 – Disposal of Excess Spoil**

**4.09.1 – General Requirements**

All information required under these rules have been met.

**4.09.2 – Valley Fill**

4.09.2(2)(d)

Per this rule, underdrain minimum sizing is based upon total amount of fill and predominant fill material type. The proposed underdrain extension does not meet minimum size criteria regardless of fill amount or type. With that being said, the Division has approved an alternative sizing with the currently approved underdrain for the KI Refuse Pile based upon the information provided in the Appendix 10(1) in the KI PAP per Rule 4.10.3(5). Please have King provide a demonstration or analysis that ensures the proposed underdrain expansion size is sufficient in alleviating water within the entire refuse pile including the proposed expansion per Rule 4.10.3(5).

All other information required under 4.09.2 has been met.

All other information required under 4.10.1 has been met.

**4.10.2 – Site Inspection**

Inspections of waste banks shall be conducted as per this Rule. No additional information is required.

**4.10.3 – Water Control Measures**

- 4.10.3(5)

Please see comment under 4.09.2(2)(d).

All other information required under 4.10.3 has been met.

**4.10.4 – Construction Requirements**

All information required under 4.10.4 has been met.

**4.11 – Coal Mine Waste**

Rule 4.11 is not applicable to the information proposed under TR-27.

## Other

- The cover page for Appendices 10(4), 10(4A) and 10(4B) appear to have been mislabeled as 4(4), 4(4A) and 4(4B) respectively. Please have King update the cover pages appropriately.
- Page 1 of the Report references DMG, please have it updated to the correct reference of DRMS.
- Page 1 of the Report refers to Rule 2.05(8), 2.50(9) and 2.05(10). It appears to the Division that these references are copied from the original Appendix 10(1) but are incorrect. It appears to the Division that they intend to be references 2.05.3(8) and 2.05.3(9). If so, please have King update the references accordingly.

This concludes my review of King's TR-27, If you have any questions, feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'Zach Trujillo'.

Zach Trujillo  
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