



May 17, 2019

Mr. Tom Bird
GCC Energy, LLC
6473 County Road 120
Hesperus, CO 81326

Re: King Coal Mine, Preliminary adequacy letter for MR-48

Dear Mr. Bird:

The Division has reviewed the proposed PAP pages submitted by GCC Energy, LLC. (GCC) with the MR-48 application as well as the Technical Memorandum from Resource Hydrogeologic Services (RHS), dated February 12, 2019.

In general we find that the proposed work plan for responding to elevated levels of organic compounds in monitoring wells is sound in its methodology and detail. However, we believe that it would be appropriate for GCC to make the following edits.

1. On Page 15, under the sub-heading Monitoring Well Abandonment and Replacement, in the middle of the first paragraph, the text, *"it is likely that the source was present in the subsurface prior to the initial well installation and is thus considered baseline. This would be the case if the source is naturally present or if contamination was introduced to the aquifer upgradient at some time prior to GCC operations,"* should be replaced with *"water quality results will be reviewed."*
2. Also in the first paragraph under Monitoring Well Abandonment and Replacement, it appears that *"the new well shall be retained"* should be replaced with *"the old well shall be retained."*

Please make these edits in a revised submittal or explain why you disagree with our comments. As always, you can contact me at Rob.Zuber@state.co.us or 303.866.3567 (x8113).

Sincerely,

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

