



"Safety as a Value"

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

August 6, 2019

State of Colorado

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

Attn: Rob Zuber, Environmental Protection Specialist II

Re: GCC Energy, LLC, King II Mine  
CDRMS Permit # C-1981-035  
Minor Revision No. 49 (MR-49) Preliminary Adequacy Review Response  
• Add Exploration Drill Hole GCC-19-06

Mr. Zuber:

In response to your letter of August 5, 2019, Preliminary Adequacy Letter for MR-49, please consider the following responses. Division concerns are shown in italics, GCC Energy responses are shown in bold font.

1. *CDRMS 08/05/2019: In the MR-49 submittal letter, the listing of revisions appears to be inaccurate. The appendices appear to be transposed. Please confirm the titles of Appendix 3(5) and Appendix 8(7).*

**GCC Energy, 08/06/2019: The titles of Appendices 3(5) and 8(7) have been corrected in the MR-49 submittal letter. A revised copy of that letter is attached.**

2. *CDRMS 08/05/2019: The Application Form for MR-49 includes 0.8 acre of new disturbance. It appears that this value includes the access road as well as the pad for drill hole GCC-19-06. If this is accurate, Map King II-005 should illustrate that the road is within the surface disturbance (with the blue dotted line as shown in the map legend).*

**GCC Energy, 08/06/2019: Map King II-005 has been revised to illustrate that the GCC-19-06 road is within the surface disturbance (with the blue dotted line as shown in the map legend).**

3. *CDRMS 08/05/2019: The Division permit number for the King Coal Mine is C-1981-035. This number should be listed accurately throughout the revised pages and maps. One place where it is inaccurate within the MR-49 submittal is within the legend of Map King II-005, where it is listed as "C-1985-035."*



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**GCC Energy, 08/06/2019: Map King II-005 has been revised to show the correct Division permit number in the legend.**

4. *CDRMS 08/05/2019: The mine workings on King II-005 were changed with this submittal. However, they should not be changed with MR-49, because a change of the mine plan requires a technical revision or perhaps a permit revision. This will have to be discussed between GCC Energy and the Division as a separate action.*

**GCC Energy, 08/06/2019: The mine workings shown on Map King II-005 have been reverted to their currently approved state. Technical Revision TR-28 will be submitted to change the mine plan portion of Map King II-005. It should be noted that actual mining occurred well within the limits of the projections as shown on the current map dated 08/14/17. Only the orientation of the mining panels was changed from east-west to northwest-southeast to accommodate MSHA requirements and local mining conditions encountered.**

5. *CDRMS 08/05/2019: Regarding Map King II-006A, please explain why the location of MW-HGA-4 is no longer shown.*

**GCC Energy, 08/06/2019: The scale of Map King II-006A has been modified to allow monitoring well MW-HGA-4 to be visible in the viewport.**

Please find enclosed:

- Corrected Minor Revision 49 Submittal Letter
- Corrected Map King II-005 Mine Plan
- Corrected Map King II-006A Soils & Vegetation – Monitoring Wells & Exploration Drill Site

Certified copies of both maps will be submitted once Division reviews have been completed (prior to final approval).

Please contact Tom Bird at 970.385.4528 x 6503 or 970.769.1160 (cell) 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