



"Safety as a Value"

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

September 17, 2019

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

Attn: Janet Binns, 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
Third Adequacy Review Response

Ms. Binns:

In response to the Division's letter of September 17, 2019, please find responses below to each item of concern (*shown in italics*) as listed in your letter. **GCC Energy responses are shown in bold text.**

Section 2.05

1. *DRMS July 17, 2019: No additional response required.*
2. *DRMS July 17, 2019: No additional response required.*
3. *DRMS July 17, 2019: No additional response required.*

Appendix 10

4. *DRMS July 17, 2019: No additional response required.*
5. *DRMS July 17, 2019: No additional response required.*
6. *DRMS September 17, 2019: The Division has a follow-up comment. There appears to be an error in the cover page for the newly provided Trautner report dated June 2015. The appendix has been labeled Appendix 10(4B), but the provided cover page is Appendix 10(4A). Please address this discrepancy.*

GCCE September 17, 2019: A revised cover page labelled Appendix 10(4B) is provided with this submittal to be attached to the Trautner report dated June 2015. Also, a revised cover page labelled Appendix 10(4C) is provided to be attached to the Addendum to the Trautner report dated September 4, 2019.

Appendix 11

7. *DRMS July 17, 2019: No additional response required.*
8. *DRMS July 17, 2019: No additional response required.*
9. *DRMS July 17, 2019: No additional response required.*
10. *DRMS July 17, 2019: No additional response required.*
11. *DRMS July 17, 2019: No additional response required.*

12. DRMS July 17, 2019: All of the Division's comments were addressed, but one item requires additional information. In item 12.e., the Division wrote, "In the "Revision 5" document, Item #4 should discuss the sizes and materials (CMP, RCP, or other) of the culverts." The intent of this comment was for GCCE to include the diameters of the culvert pipes. **Please provide the pipe diameters in the report**

GCCE September 17, 2019: A statement has been added to Item #4 of the "Revision 5" document to clarify that the culvert is 24" CMP.

13. DRMS July 17, 2019: No additional response required.

Maps

- 14. DRMS July 17, 2019: No additional response required.
- 15. DRMS July 17, 2019: No additional response required.
- 16. DRMS July 17, 2019: No additional response required.
- 17. DRMS July 17, 2019: No additional response required.
- 18. DRMS July 17, 2019: No additional response required.
- 19. DRMS July 17, 2019: No additional response required.

New Adequacy Item Based on the Reclamation Cost Estimate

20. Additional detail should be provided for volumes of Plant Growth Medium and the cover material for the refuse pile. Ideally, volumes will be provided for all sources of material, including stockpiles and borrow areas. Short of this ideal, please provide as much information as possible. This information should be included in Section 2.05.4 of the PAP, preferably in tabular format. A related issue is the area located south of the East Pond that has been designated as a Plant Growth Medium Storage Area. Please add a discussion of the planned use of this area in the text (including volumes as applicable).

GCCE September 17, 2019: Additional detail has been added to Section 2.05.4 pages 5 and 5A of the PAP concerning Plant Growth Medium, fill material, stockpiles, borrow areas, etc. A table has been added to page 5A showing locations, volumes and comments for each materials stockpile.

The Reclamation Cost Estimate, dated September 17, 2019, prepared by the Division is attached as new Appendix 12(6A).



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Please find enclosed 2 copies each of:

- King I PAP Cover Page (TR-27 Third Adequacy Review)
- King I Table of Contents page iii
- King I 2.05.4 page 5
- King I 2.05.4 page 5A
- King II PAP Cover Page (TR-27 Third Adequacy Review)
- Cover Page for Appendix 10(4B) Trautner Geotech Engineering Study dated June, 2015
- Cover Page for Appendix 10(4C) Trautner Geotech Report Addendum dated September 4, 2019
- Appendix 11(1A) Stoner Engineering "Revision 5" Document
- Appendix 12(6A) TR-27 Reclamation Cost Estimate - CDRMS

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