



STATE OF  
COLORADO

Simmons - DNR, Leigh <leigh.simmons@state.co.us>

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## MR-439 Mobile MVB Flaring Units

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**Simmons - DNR, Leigh** <leigh.simmons@state.co.us>  
To: "Welt, Kathy" <KWelt@archcoal.com>

Tue, Nov 19, 2019 at 10:39 AM

Kathy,

An initial adequacy review letter for MR-439 is attached

Leigh Simmons  
Environmental Protection Specialist



**COLORADO**  
Division of Reclamation,  
Mining and Safety  
Department of Natural Resources

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**Adequacy letter, West Elk, MR-439, 1.pdf**  
130K



**COLORADO**  
Division of Reclamation,  
Mining and Safety  
Department of Natural Resources

Kathleen G. Welt  
Mountain Coal Company, LLC  
5174 Highway 133  
Somerset, CO 81434  
November 19, 2019

**Re: West Elk Mine (Permit No. C-1980-007)**  
**Minor Revision No. 439, (MR-439)**  
**Initial Adequacy Review**

Dear Ms. Welt,

The Colorado Division of Reclamation, Mining and Safety (Division) has completed the initial review of materials submitted by Mountain Coal Company, LLC (MCC) in support of the MR-439 application. The Division's comments and questions are below, with items that need to be addressed highlighted in bold type.

Rule 2.05.3 – Operation Plan – Permit Area

- 1. Please update the text of section 2.05.3 to include a description of the proposed mobile flaring units and how they are intended to be used. Please include a description of how the units will be transported around the site, and how they will be removed from the site when no longer required. Please also include a reference in the text to the drawing submitted with the MR-439 application.**

It will be necessary to update the reclamation cost estimate with MR-439; a proposed cost estimate will be generated when other adequacy items have been addressed.

Yours sincerely,

Leigh Simmons  
Environmental Protection Specialist

