



January 30, 2020

Mr. Leigh Simmons
Environmental Protection Specialist
Colorado Division of Reclamation, Mining and Safety
1313 Sherman Street, Room 215
Denver, CO 80203

Re: Oxbow Mining, LLC., Permit C-1981-022
2019 Annual Reclamation Report

Dear Mr. Simmons:

The following information is submitted as the 2019 Annual Reclamation Report for the Oxbow Mining, LLC, Sanborn Creek and Elk Creek Mines. The contents of this report are submitted to satisfy the requirements of CDMG Rule 2.04.13 Annual Reclamation Reports. Also included is an executed *CDRMS, Annual Reclamation Report for Calendar Year 2019* form.

Location and numbers of acres disturbed during 2019: 0.00 acres

Location and number of acres of areas backfilled and graded during 2019: 0.00 acres

Basically, all that remains to complete demolition, backfill and grading for the property are the dams that remain at the bottom of the refuse piles, (Pond C and Pond E), and the reclamation of the West Valley II lower access road. This activity is anticipated to occur after Phase 2 surety release of the refuse piles is achieved.

Surety Release 01 (SL-01) for the Elk Creek facilities area was completed during 2019. SL-01 included 19.4 acres of phase 1 bond release in areas known as the Middle and Lower Pads. A 1.3 acre area composed of a two foot barrier surrounding the reclaimed Elk Creek was not included in the release, but will be eligible for phase 3 release in 2028.

Seed Purchases:

No seed was purchased during 2019. Minimal "supplemental" spreading of Oxbow Table 3 seed mix occurred on the Middle and Lower Pad areas during 2019. No seed mix was spread on USFS lands. No seed mix was spread on BLM lands.

Weed Control

Scattered thistles, hounds tongue, white top and other noxious weeds were sprayed by Oxbow employees. *Curtail* and *Escort* herbicides were used in accordance with the labels. Areas sprayed included general disturbance areas such as road cuts, reclaimed areas, warehouse storage areas, pond out slopes, reclaimed borehole roads and borehole pad sites, etc.

Rill and Gully Survey

The Lower Hubbard Creek site, the Bear Creek site, the reclaimed areas of the II West and West Valley fill coal refuse disposal area and East Yard coal refuse disposal area and the reclaimed degas wells sites, etc. were inspected for the formation of rills and gullies deeper than nine inches. No such gullies were encountered which would require follow-up repair and seeding.

Reclamation Map

As in years past, included with this report is an updated: EXHIBIT 1 – SUMMARY OF DISTURBANCE/ SEEDED AREAS summarizing the OMLLC disturbance and reclaimed areas. It is implied that the areas noted as reclaimed include applicable backfilling, grading, topsoil spreading, and seeding activities.

Light use drill roads requested to remain un-reclaimed, are marked on EXHIBIT 1 as HR ROAD LEFT, with a yellow background. Acreages of locations marked as partially reclaimed are not included in seeded areas amounts.

Please contact me at 970-929-6034 if you have questions or need additional information.

Sincerely,



Doug A. Smith
Chief Engineer

Attachments

Xc: Mike Ludlow (OMLLC)
files

OXBOW MINING, LLC**2019 ARR****Exhibit 1 – Summary of Disturbance/ Seeded Areas****DISTURBED AREAS (Note 1)**

<u>Existing Facilities</u>	<u>Acres</u>	<u>Status</u>
Temporary conveyor Elk Creek	0.30	Reclaimed
Rock dust site – Elk Creek	0.50	Existing
Elk Creek facilities area	39.00	Existing
Sanborn Creek mine, SC-1	4.10	Remains as industrial post mining use
West Valley Fill and haul road	12.90	Partially Reclaimed
Elk Creek mine surface facilities	24.20	Reclaimed some remains industrial
II West Coal Mine Waste Facility (initial)	3.33	Partially Reclaimed
Sanborn Creek Portal Borrow area	0.43	Reclaimed
subtotal	84.76	
<u>Satellite Facilities</u>		
Upper Hubbard Creek	3.30	Existing
Lower Hubbard Creek	2.60	Reclaimed
Power line road, Hubbard Creek	0.7	Existing
Bear Creek fan area (U.S. Steel)	3	Reclaimed
Water treatment plant area	1.5	Existing
Sewage effluent absorption field	0.3	Existing
Substation No. 3 and ventilation shaft	1.6	Remains as industrial post mining use
Coal Gulch drill holes	0.4	Reclaimed
Power line road	17	Partially Reclaimed
Hubbard Fansite	3.2	Reclaimed
Bear Creek Fan and Shaft (2009)	2.3	Remains as industrial post mining use
subtotal	35.90	

Degasification (Gob Vent Borehole) borehole sites and light use roads

Sanborn Creek Mine (#s 1-14)	6.10	Reclaimed
GVB-LW4-01 (1915' road and pad)	1.45	Reclaimed
GVB-LW3-01, GVB-LW4-03 (4000' road and pads)	2.10	Reclaimed
GVB-LW3-02	0.54	Reclaimed
GVB-LW4-02	0.49	Reclaimed
Bear Creek Cutoff LU Road	2.10	Existing
GVB-LW6-02 (1600' road and pad)	0.93	Reclaimed
GVB-LW6-03 535' road and pad	0.63	Reclaimed
GVB-LW7-02 pad plus 600' road	0.73	Reclaimed
GVB-LW7-03	0.25	Reclaimed
GVB-LW7-04	0.20	Reclaimed
GVB-LW8-01	0.46	Reclaimed
GVB-LW8-02 pad plus 1425' road	1.41	Reclaimed
GVB-LW8-03	0.16	Reclaimed
GVB-LW8-04	0.14	Reclaimed

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GVB-LW9-01 pad plus 3500' road	1.70 Reclaimed	
GVB-LW9-03 pad plus 132' road	0.40 Reclaimed	
GVB-LW9-01B pad plus 5600' road	2.77 Reclaimed	
GVB-LW9-02 pad	0.42 Reclaimed	
GVB-LW9-04 pad	0.39 Reclaimed	
GVB-LW9-05 pad plus 1300' road	1.15 Reclaimed	
GVB-LW10-01 pad plus 1190' road	0.93 Reclaimed	
GVB-LW10-02 pad	0.31 Reclaimed	
GVB-LW10-03B C Pad	1.23 Reclaimed	
GVB-LW10-04 pad	0.36 Reclaimed	
GVB-LW10-05 pad plus 896' road	0.79 Reclaimed	HR ROAD LEFT
GVB-LW11-01A pad	0.33 Reclaimed	
GVB-LW11-01B pad	0.15 Reclaimed	
GVB-LW11-02 pad along road	0.43 Reclaimed	
GVB-LW12-01 pad plus 709' road	0.79 Reclaimed	
GVB-LW12-02 pad along road	0.00 Reclaimed	
GVB-LW12-03 pad along road	0.50 Reclaimed	
GVB-LW12-03 - 2013' road	0.83 Reclaimed	HR ROAD LEFT
GVB-LW11-03 pad along road	0.22 Reclaimed	
GVB-LW15-02, 01A, 01B pad	1.77 Reclaimed	
GVB-LW15-03 pad + 5,500' road	3.89 Reclaimed	
GVB-LW15-04 pad + 1,207' road	1.80 Reclaimed	
GVB-LW15-05 pad + 2000' road	1.40 Reclaimed	
GVB-LW15-06 pad + 830' road	1.20 Reclaimed	
GVB-LW15-07 pad + 1,500' road	1.25 Reclaimed	
GVB-LW15-08 pad + 200' road	0.91 Reclaimed	
GVB-LW16-01, B, C, D, E (2 pads + 790' road) (lower pad)	2.54 Reclaimed	HR ROAD LEFT
GVB-LW16-02 pad + 1,300' road	2.01 Reclaimed	
GVB-LW16-03 pad + 333' road	1.54 Reclaimed	
GVB-LW16-04 pad + 1100' road	1.98 Reclaimed	HR ROAD LEFT
GVB-LW16-05 pad + 1000'	1.50 Reclaimed	HR ROAD LEFT
GVB-LW16-06 pad + 750' road	0.88 Reclaimed	
GVB-LW16-07 pad + 600' road	0.83 Reclaimed	
GVB-LW16-08 pad + 670' road	0.64 Reclaimed	
GVB-LW17-01AB pad + 319' road	1.09 Reclaimed	
GVB-LW17-01C pad	0.30 Reclaimed	
GVB-LW17-02, 02B, 02C pad + 35' road	0.72 Reclaimed	
GVB-LW17-03 pad + 180' road	0.86 Reclaimed	
GVB-LW17-07 pad	0.43 Reclaimed	
GVB-LW18-01A pilot - pad + 1,500'	1.31 Reclaimed	
GVB-LW18-03 pilot- pad + 569'	0.62 Reclaimed	HR ROAD LEFT
GVB-LW18-07 pad + 1900' road	0.78 Reclaimed	
GVB-LW18-08 pad + 600' road	0.90 Reclaimed	
GVB-LW18-09 + 1600' road	1.65 Reclaimed	
GVB-LW19-01A pilot- pad + 440' (see HGBMP)	1.32 Reclaimed	HR ROAD LEFT
GVB-LW19-03 pilot- pad + 537' road	1.35 Reclaimed	
GVB-LW19-07 + road 525'	1.00 Reclaimed	

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GVB-LW19-08 + road 1833'	1.89 Reclaimed	
GVB-LW19-09 + road 755'	1.27 Reclaimed	
VB-1S, B-1S, pad +800' road	0.43 Reclaimed	
ECM-10-68 pad + 500' road	0.39 Reclaimed	
ECM-10-69 pad + 770' road	0.46 Reclaimed	
ECM-10-70 pad	0.25 Reclaimed	
ECM-10-71 pad + 420' road	0.37 Reclaimed	
ECM-10-72 pad + 370' road	0.35 Reclaimed	
ECM-10-73 pad + 700' road	0.44 Reclaimed	
ECM-10-74 pad + 1,360' road	0.62 Reclaimed	
ECM-10-75 pad + 475' road	0.38 Reclaimed	
ECM-10-76 pad + 225' road	0.31 Reclaimed	
GVB-LW17-04, 04B, 04C	0.96 Reclaimed	
GVB-LW17-05, 05B pad + 700' road	1.50 Reclaimed	HR ROAD LEFT
GVB-LW17-06, 06B, 06C pad + 757' road	1.17 Reclaimed	
GVB-LW17-08, 08B pad + 1477' road	1.22 Reclaimed	
GVB-LW17-09 pad + 517' road	1.19 Reclaimed	
GVB - LW18-01B	0.65 Reclaimed	HR ROAD LEFT
GVB-LW18-02 pad + 146 road	0.99 Reclaimed	
GVB-LW18-02B + 417' road	0.97 Reclaimed	HR ROAD LEFT
GVB-LW18-03B + 297' road	0.88 Reclaimed	HR ROAD LEFT
GVB-LW18-04	0.54 Reclaimed	
GVB-LW18- 04B +78' road	1.03 Reclaimed	
GVB-LW18-04C + 371' road	0.76 Reclaimed	HR ROAD LEFT
GVB-LW18-05 + 328' road	1.24 Reclaimed	HR ROAD LEFT
GVB-LW18-06 + 100' road	0.75 Reclaimed	
GVB-LW19-01B +116' road	0.74 Reclaimed	
GVB-LW19-01C on road	0.69 Reclaimed	
GVB-LW19-01D on road	0.90 Reclaimed	
GVB-LW19-02 + 275' road	1.14 Reclaimed	HR ROAD LEFT
GVB-LW19-02B + 450' road	0.84 Reclaimed	HR ROAD LEFT
GVB-LW19-03B + 49' road	1.05 Reclaimed	
GVB-LW19-04 on road	0.70 Reclaimed	
GVB-LW19-04B + 52' road	1.13 Reclaimed	HR ROAD LEFT
GVB-LW19-05 + 222' road	0.96 Reclaimed	HR ROAD LEFT
GVB-LW19-06 + 1423' road	1.42 Reclaimed	
TGBMPA +556' road	1.10 Reclaimed	HR ROAD LEFT
HGBMP + (19-01A location)	0.00 Reclaimed	HR ROAD LEFT
HGA	1.54 Reclaimed	
TGA	0.76 Reclaimed	
5B	0.79 Reclaimed	
Dewater #1,#2 5082' road only	2.10 Reclaimed	
Dewater #1,#2 pad only	1.60 Reclaimed	
subtotal	106.33	

Total Disturbance

226.99 acres

OXBOW MINING, LLC**2019 ARR****SEEDED AREAS (Note 1)**

<u>Area</u>	<u>Acres</u>	<u>Year Seeded</u>
1. Lower Hubbard Creek(Somerset Mine)	2.6	1996
2. Bear Creek fan area (Somerset Mine)	3	1996
3. Power line road	17 ACRES	partially reclaimed
5. East Yard coal mine waste (gob) pile	1.1	2002 and 2003
6. West Valley Fill	0.6	2002
7. West Valley Fill	0.53	2003
8. A-Gulch	5	2003
9. Sanborn Creek Portal area	2.34	2003
10. GVB-LW3-01, GVB-LW4-03 (road and pads)	2.1	2005
11. GVB-LW3-02	0.54	2005
12. GVB-LW4-01 (road and pad)	1.45	2005
13. GVB-LW4-02	0.49	2005
14. GVB-LW6-02 (road and pad)	0.93	2006
15. GVB-LW6-03 pad plus 535' road	0.63	2006
16. GVB-LW7-02 pad plus 600' road	0.73	2006
17. GVB-LW8-01	0.46	2006 and 2007
18. GVB-LW7-03 pad	0.25	2007
19. GVB-LW12-01 (pad and 709' road)	0.79	2007
20. GVB-LW11-01B	0.15	2007
21. GVB-LW10-01 pad plus 1190' road	0.93	2007
22. TC1 and TC2 wells	3	2007
23. GVB-LW9-01 pad + 3500' road	1.7	2008
24. GVB-LW11-01A pad	0.33	2008
25. GVB-LW12—03 pad	0.5	2008
26. GVB-LW9-01B pad +5600' road	2.77	2009
27. GVB-LW10-02 pad	0.31	2009
28. GVB-LW8-02 1,425' road only	1.41	2009
29. GVB-LW10-03BC pad	1.23	2009
30. GVB-LW9-03 pad	0.40	2009
31. II West up to 6,100'	0.37	2009
32. GVB-LW8-02 pad and 1425' road	1.41	2010
33. GVB-LW8-03 pad only	0.16	2010
34. GVB-LW9-04 pad	0.39	2010
35. GVB-LW10-04 pad	0.36	2010
36. GVB-LW11-02 pad on road	0.43	2010
37. GVB-LW12-02 pad on road	0.00	2010
38. VB-1S-01, B-1S-02 pad + 800' road	0.43	2010
39. II West — 6100' to 6113'	0.10	2010
40. ECM-10-68 pad + 500' road	0.39	2010

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41. ECM-10-69 pad + 770' road	0.46	2010	
42. ECM-10-70 pad	0.25	2010	
43. ECM-10-71 pad + 420' road	0.37	2010	
44. ECM-10-72 pad + 370' road	0.35	2010	
45. ECM-10-73 pad + 700' road	0.44	2010	
46. ECM-10-74 pad + 1,360' road	0.25	2010	
47. ECM-10-75 pad + 475' road	0.38	2010	
48. ECM-10-76 pad + 225' road	0.31	2010	
49. GVB-15-03 pad + 5500' road	3.89	2011	
50. GVB-15-04 pad + 1,207' road	1.80	2011	
51. GVB-15-05 pad + 2,000' road	1.40	2011	
52. GVB-15-06 pad + 830' road	1.20	2011	
53. GVB-15-07 pad + 1,500' road	1.25	2011	
55. GVB-16-02, 02B, 02C pad + 1,300' road	2.01	2011	
56. GVB-16-03 pad + 333' road	1.54	2011	
57. GVB-16-04, pad + 1100' road	1.98	2011	HR ROAD LEFT
GVB-LW16-05 pad + 1000'	1.50	2011	HR ROAD LEFT
58. GVB-16-06 pad + 750' road	0.88	2011	
59. GVB-16-07, 07B pad + 600' road	0.83	2011	
60. GVB-18-07 pad	0.78	2011	
61. Hubbard Fansite	3.20	2011	
62. GVB-LW18-01A pad + 1500' road	1.31	2011	
63. II West - 6113' to 6122'	0.10	2011	
64. GVB-LW17-01C pad	0.30	2011	
65. GVB-LW19-03 pilot- pad + 537' road	1.35	2011	
66. II West - 6122' to 6128'	0.10	2012	
67. GVB-LW15-02, 01A, 01B pad	1.77	2012	
68. GVB-LW15-08 pad + 200' road	0.91	2012	
69. GVB-LW17-01AB pad + 319' road	1.09	2012	
70. GVB-LW17-03 pad + 500' road	0.86	2012	
71. GVB-LW17-04, 04B, 04C	0.96	2012	
72. GVB-LW17-09 pad only	0.98	2012	
73. GVB-LW9-05 + 1300' road	1.15	2012	
GVB-LW10-05 pad plus 896' road	0.79	2012	HR ROAD LEFT
GVB-LW12-03 - 2013' road	0.83	2012	HR ROAD LEFT
GVB-LW11-03 pad along road	0.22	2012	
74. II West - 6128' to 6141'	0.20	2013	
GVB-LW18-07 pad + 1900' road	0.78	2016	
GVB-LW18-08 pad + 600' road	0.90	2016	
GVB-LW19-08 + road 1833'	1.89	2016	
Dewater #1, #2 5082' road only	2.10	2016	
Dewater #1, #2 pad only	1.60	2016	
4. Degasification Boreholes (#s 1-14)	6.10	2017	
GVB-LW7-04	0.20	2017	
GVB-LW8-04	0.14	2017	
53. GVB-LW16-01, B, C, D, E (2 pads + 790' road) (lower p	2.54	2017	HR ROAD LEFT
GVB-LW16-08 pad + 670' road	0.64	2017	

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GVB-LW17-02, 02B, 02C pad + 35'road	0.72	2017	
GVB-LW17-05, 05B pad + 700' road	1.50	2017	HR ROAD LEFT
GVB-LW17-06, 06B, 06C pad + 757'road	1.17	2017	
GVB-LW17-07 pad	0.43	2017	
GVB-LW17-08, 08B pad + 1477'road	1.22	2017	
GVB-LW18-03 pilot- pad + 569'	0.62	2017	
GVB-LW18-09 + 1600' road	1.65	2017	HR ROAD LEFT
GVB-LW19-01A pilot- pad+ 440' (see HGBMP)	1.32	2017	
GVB-LW19-07 + road 525'	1.00	2017	
GVB-LW19-09 + road 755'	1.27	2017	
GVB-LW17-09 pad + 517'road	1.19	2017	
GVB - LW18-01B	0.65	2017	HR ROAD LEFT
GVB-LW18-02 pad + 146 road	0.99	2017	
GVB-LW18-02B + 417' road	0.97	2017	HR ROAD LEFT
GVB-LW18-03B + 297' road	0.88	2017	HR ROAD LEFT
GVB-LW18-04	0.54	2017	
GVB-LW18- 04B +78' road	1.03	2017	
GVB-LW18-04C + 371' road	0.76	2017	HR ROAD LEFT
GVB-LW18-05 + 328' road	1.24	2017	HR ROAD LEFT
GVB-LW18-06 + 100' road	0.75	2017	
GVB-LW19-01B +116' road	0.74	2017	HR ROAD LEFT
GVB-LW19-01C on road	0.69	2017	
GVB-LW19-01D on road	0.90	2017	
GVB-LW19-02 + 275' road	1.14	2017	HR ROAD LEFT
GVB-LW19-02B + 450' road	0.84	2017	HR ROAD LEFT
GVB-LW19-03B + 49' road	1.05	2017	
GVB-LW19-04 on road	0.70	2017	
GVB-LW19-04B + 52' road	1.13	2017	HR ROAD LEFT
GVB-LW19-05 + 222' road	0.96	2017	HR ROAD LEFT
GVB-LW19-06 + 1423' road	1.42	2017	
TGBMPA +556' road	1.10	2017	HR ROAD LEFT
HGBMP + (19-01A location)	0.00	2017	HR ROAD LEFT
HGA	1.54	2017	
TGA	0.76	2017	
5B	0.79	2017	
Roads left @ land owners req. in 2017	-2.54		
Roads left @ land owners req. before 2017	-2.07		
<u>Prior to 2018 Total Reclamation</u>	<u>124.24</u>		

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Upper Topsoil pile	1.40	2018
Middle Pad	5.40	2018
Lower Pad	15.00	2018
WVI Top	0.80	2018
WVI Topsoil pile	0.40	2018
WVII Upper Road	1.50	2018
WVII Top and Topsoil pile	3.10	2018

<u>2018 Total Reclamation</u>	27.60
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<u>Cumulative Total Reclamation</u>	151.84
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Note 1 - Disturbance and seeded area acreages were evaluated and adjusted after 2014 review of as- built roads and GVB drill pads.

yellow back ground denotes road left per land owners request (see MR108)

green background denotes reclaimed in 2018

	Phase 1 (ac.)	Ph. 2 (ac.)	Ph. 3 (ac.)
SL-1	19.4		

Colorado Division of Reclamation, Mining and Safety

Annual Reclamation Report for Calendar Year – 2019

ELK CREEK MINE

C-1981-022

OXBOW MINING, LLC.

Mine Name

Permit Number

Permittee

P.O. BOX 535, SOMERSET, CO 81434

Address

This report, required by Rule 2.04.13, is due by February 15 of each year, or other date, as agreed upon by the Division. It should include text, discussion, and maps, at a minimum, in addition to any other reclamation monitoring data as required by the approved permit. The location of the acreage reported under each land status category and year of seeding (if applicable) should be clearly identified on a map included with the report.

Land Category	Last Year's Cumulative Total (from last year's ARR)	This Calendar Year			Cumulative Total
		Acres Added (+)	Acres Subtracted (-)		
Acreage in Active Mining Areas ¹	N/A			=	N/A

Land Category	Last Year's Cumulative Total (from last year's ARR)	This Calendar Year			Cumulative Total
		Acres Added (+)	Acres Subtracted (-)		
Acres Disturbed ²	226.9	0	0	=	226.9
Acres Backfilled and Graded	151.84	0	0	=	151.84
Acres Topsoiled	151.84	0	0	=	151.84

Acreage in Long-term Facilities ³	Last Year's Cumulative Total (from last year's ARR)	This Calendar Year			Cumulative Total
		Acres Added (+)	Acres Subtracted (-)		
Non-Permanent Facilities	N/A			=	N/A
Permanent Facilities (permitted)	151.84	0	0	=	151.84
Totals	151.84			=	151.84

Acres Seeded (permanent)	Last Year's Cumulative Total (from last year's ARR)	This Calendar Year			Cumulative Total
		Acres Added (+)	Acres Subtracted (-)		
9 Years and Less	121.69	0	6.49	=	115.2
10 Years and Greater	30.15	6.49	0	=	36.64
Totals	151.84			=	151.84

Bond Release	Last Year's Cumulative Total (from last year's ARR)	This Calendar Year			Cumulative Total
		Acres Added (+)	Acres Subtracted (-)		
Phase I Released	0	19.4	0	=	19.4
Phase II Released	0			=	0
Phase III Released	0			=	0

¹Includes pits, topsoil stripped areas in advance of pits, and spoil not backfilled and graded

²Surface Mine Acres Disturbed = B&G + Long-Term Facilities + Active Mining Areas; Underground Mine Acres Disturbed = B&G + Long-Term Facilities; Separately-permitted Loadouts = B&G + Long-Term Facilities

³Includes haul, access and light-use roads, temporary dams and impoundments; permanent dams and impoundments; diversion and collector ditches, water and air monitoring sites; topsoil stockpiles; overburden stockpiles; repair, storage and construction areas; office area, repair shops, and parking; coal stockpiles, loading, and processing areas; railroads; coal conveyors; refuse piles and coal mine waste impoundments; head-of-hollow fills; valley fills; ventilation shafts and entryways; and non-coal waste disposal area (garbage dumps and coal combustion by-products disposal areas).