



Kathleen G. Welt  
Mountain Coal Company, LLC  
West Elk Mine  
5147 Highway 133  
Somerset, CO 81434

March 24, 2020

**Re: West Elk Mine (C-1980-007)**  
**Subsidence Monitoring Reports, 2019**

Dear Ms. Welt,

The Division has completed a review of the 2019 Subsidence Monitoring Reports submitted by Mountain Coal Company, LLC, for the West Elk Mine.

The spring 2019 report was received by the Division on September 27, 2019, and the fall report on March 6, 2020. Both reports were prepared by Gary D. Witt, a certified professional geologist with Wright Water Engineers, Inc. The submission of these reports to the Division satisfies a commitment made in section 2.05 of the Permit Application Packet (PAP, page 2.05-164).

The reports present the results of visual subsidence surveys, with associated maps, as well as: quarterly land surveys of survey monuments; USFS road and stock pond monitoring reports; aerial surveys of Monument Dam and Minnesota Reservoir; and a copy of the USFS Water Resources Survey report.

The reports conclude that the observed effects of subsidence are consistent with the conceptual model presented in the PAP, and are generally less than were initially predicted. Furthermore, subsidence cracks have not been observed in alluvial materials and subsidence does not appear to have had any significant impact to surface water hydrology in the area.

A footnote to Table 1 in Appendix A notes that the measured displacement of the majority of survey monuments was greater than has typically been observed to date and that this is inconsistent with the visual and aerial surveys which did not indicate significant movement. MCC plans to do a field inspection of the survey points in the spring of 2020.

Sincerely,

Leigh Simmons  
Environmental Protection Specialist

