



March 26, 2020

Tom Bird
GCC Energy, LLC
6473 County Road 120
Hesperus, CO 81326

**Re: King Coal Mine, Permit C-1981-035,
Third Review of the 2018 Annual Hydrology Report**

Dear Mr. Bird:

The Division received the 2018 AHR for the King Coal Mine on December 31, 2018. I have reviewed this AHR in the context of Rules 4.05.1, 4.05.6, 4.05.11, and 4.05.13 and sent letters with my comments on January 2, 2020 and February 25, 2020. GCC Energy has sent Technical Memoranda by Resource Hydrogeologic Services (RHS) addressing my comments. In response to the Technical Memorandum dated March 19, 2020, I have the following comments. The numbers correspond to my comments in my February 25th letter.

1. In future AHRs, RHS has agreed to incorporate applicable standards from CDPHE's Regulation 34 into the assessment of potential impacts from the mine on Hay Gulch. No further action is required for the 2018 AHR.
2. Please direct me to the portion of the CDS Environmental Services report from 2014 ("Summary of Analytical Activities in Response to Neighborhood Comments in Conjunction with a Permit Expansion of GCC Energy, LLC King II Coal Mine") that illustrates that the data from Vista Del Oro wells is a baseline condition, given that King II mining began in 2007.
3. No additional response is requested from GCC Energy.
4. Please see Item #1.

As always, please feel free to call to discuss on the telephone or e-mail me with your comments and questions.

Regards,

Robert D. Zuber, P.E.
Environmental Protection Specialist II

Cc: Sarah Vance, GCC Energy, via e-mail

