



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

Date: March 27, 2020

To: Robin Reilley

CC: Jared Ebert and Jason Musick

From: Zach Trujillo

RE: Trapper Mine, DRMS File No. C-1981-010
Trapper Mine TR-124 Review Memo

Robin,

As requested I have reviewed Trapper Mine's (Trapper) proposed changes under TR-124 for Rules 2.05.3(6), 4.09, 4.10, 4.14 and 4.23. Please see the following comments:

2.05.3(6)

- (a) A blasting plan for, which is applicable to the proposed changes under TR-124, can be found under Section 3.4 of the Trapper PAP. All information required is present.
- (b) As proposed, spoil during the initial box cut for the proposed Nighthawk Pit (N Pit) will be temporarily placed "west and slightly above the pit" as stated under the proposed Section 3.5.4. Per this section of the Rule, [d]escriptions, including appropriate maps, prepared according to the standards of 2.10, and cross section drawings, of the proposed disposal site and design of the spoil disposal structures according to 4.09. As proposed, no maps or designs have been included for the temporary spoil pile associated with the N Pit. **Please have Trapper provide appropriate maps and cross section drawings for the N Pit temporary spoil pile.**
- (c) Per this section of the Rule, "[t]he results of a geotechnical investigation of the proposed disposal area..." is required. It appears that Agapito Associates, Inc. has prepared a geotechnical study to assess the global stability of the proposed spoil pile however, it does not appear that it was provided with TR-124. **Please have Trapper provide the associated geotechnical investigation for the proposed N Pit temporary spoil pile.**
- (d) This section of the Rule is not applicable.

4.09.1 – Disposal of Excess Spoil, General Requirements

- (1) Excess spoil is proposed to be hauled to the A Pit ash dump area for final cover above the ash spoils. Trapper proposes that approximately 800,000 cubic yards of material be taken from the N Pit to backfill the area to the approved post mining topography (PMT). Trapper

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estimates that the re-disturbance of spoil within the N Pit will only have a swell of 10%. It is unsure to the Division that there will be enough material to not only backfill the A Pit ash dump but also the N Pit to the approved PMT. **Please have Trapper provide additional detail and information to ensure there will be enough material to backfill and regrade both the A Pit and N Pit as proposed.**

- (2) Per this section of the Rule, [t]he fill shall be designed using recognized professional standards, certified by a registered professional engineer, and approved by the Division. Since the excess spoil is being used to backfill the A Pit ash dump, which is the remains of an older box cut to an already approved PMT, this section of the Rule is not applicable. For the temporary spoil pile, please refer to Section 2.05.3(6) of this memo.

All additional information required by this Rule has been provided or is not applicable. Please refer to Sections 3.1.5 and 3.5.4 of Trappers PAP and proposed pages under the mentioned sections for TR-124.

4.09.2 – Valley Fill

This rule is not applicable.

4.09.3 – Head of Hollow Fill

This rule is not applicable.

4.09.3 – Durable Rock Fills

This rule is not applicable.

4.10 – Coal Mine Waste Banks

This Rule is not applicable.

4.14.1 – Backfilling and Grading, General Requirements

All information required by this section of the Rule has been provided. Please refer to Sections 3.5.1 and 3.5.2 of Trappers PAP and proposed pages under the mentioned section for TR-124.

4.14.2 – Backfilling and Grading, General Grading Requirements

All information required by this section of the Rule has been provided. Please refer to Sections 3.5.3, 3.5.4, and 3.5.7 of Trappers PAP and proposed pages under the mentioned section for TR-124.

4.14.3 – Backfilling and Grading, Covering Coal and Acid- and Toxic-Forming Materials

This Rule is not applicable to TR-124. Discussion in regards to this Rule can be found in Section 3.5.6 of the Trapper PAP.

4.14.4 – Backfilling and Grading, Thin Overburden

This Rule is not applicable. Discussion in regards to this Rule can be found in Section 3.5.7 of the Trapper PAP.

4.14.5 – Backfilling and Grading, Thick Overburden

This Rule is not applicable. Discussion in regards to this Rule can be found in Section 3.5.7 of the Trapper PAP.

4.23.2 – Auger Mining, Performance Standards

All information required by this section of the Rule has been provided or is not applicable. Trapper has committed to optimize coal recovery based on the proposed highwall mining plan, ensuring access for removal of reserves by future underground mining activities, and has provided all performance standards as required per this section of the Rule. Please refer to Sections 3.1.4.2 and 3.1.5 of Trappers PAP and proposed pages under the mentioned section for TR-124.

Other

It appears to the Division that there may be a typo found on proposed page 3-15c on the 6th paragraph under Section 3.1.5. When discussing swell associated with the re-disturbance, it states that the re-disturbed spoils will be coming from the A Pit. It is the Division's understanding that the re-disturbed excess spoil will be coming from the N Pit and then placed at the A Pit. **Please correct the typo or provide additional clarification in regards to the re-disturbed spoils associated with the A Pit as stated in the poposed page 3.15c.**

This concludes my review of Trapper's proposed changes under TR-124 for Rules 2.05.3(6), 4.09, 4.10, 4.14 and 4.23. If you have any questions, feel free to contact me.

Sincerely,



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