

"Safety as a Value"

May 13, 2020

State of Colorado Division of Reclamation, Mining & Safety 1313 Sherman St., Room 215 Denver, CO 80203

Attn: Rob Zuber, P.E., Environmental Protection Specialist II

Re: GCC Energy, LLC, King II Mine CDRMS Permit # C-1981-035 Technical Revision No. 29 (TR-29) PAR Response

- Additional pages
- Remove Old Version of Appendix 11

Mr. Zuber:

In response to your email comments of May 12, 2020 regarding Technical Revision TR-29 Preliminary Adequacy Review response submitted 05/08/2020, please find attached:

Missing page 'King II 2.05.3 page 5 2020 05 12'.

New 'Appendix 11 Cover Page'.

New page 'King II Appendix 11 Table of Contents 2020 25 13'.

Missing page 'Appendix 11(1) Introduction 2015 06 30'.

Also, regarding your question concering outdated 'King_II_11_Hydrologic_Designs.pdf' prepared by J.T. Paluso, P.E., dated May, 2006, please remove that document from the King II Permit Application Package.

Also, concerning your question:

Related to the SEDCAD model for CWD-2, please explain why channels L', M', and N' are not included in the "main" SEDCAD run with the other CWD-2 channels, but rather they are added at the end as Utility Runs. This is part of Item #10 in our PAR.

Please consider the following responses:

1. We think it is easier to understand. The SWS flows and corresponding structures networks, are easier to follow when model separately (using utility runs to combine).



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- 2. Combining everything into one model would result in a large model with a complex structure network that would produce an output of equal complexity.
- 3. We wanted to preserve the current hydrology report as much as possible and only redesign/replace the drainage reports affected by TR-29.

Please find enclosed:

- King II Section 2.05.3 page 5
- King II Appendix 11 Cover Page
- King II Appendix 11 Table of Contents
- King II Appendix 11(1) Introduction 2015 06 30

Please contact Tom Bird at 970.769.1160 (cell) with questions or comments.

Sincerely,

Tom Bird GCC Energy, LLC tbird@gcc.com