


TRI-STATE GENERATION AND TRANSMISSION ASSOCIATION, INC.
HEADQUARTERS: P.O. BOX 33695 DENVER, COLORADO 80233-0695 303-452-6111

May 18, 2020

Mr. Zach Trujillo
 Environmental Protection Specialist
 Colorado Division of Reclamation, Mining & Safety
 Department of Natural Resources
 1313 Sherman Street, Room 215
 Denver, CO 80203

RE: Colowyo Coal Company L.P.
Permit No. C-1981-019
Minor Revision No. 216
Adequacy Response

Dear Mr. Trujillo,

Tri-State Generation and Transmission Association Inc. (Tri-State), is the parent company to Axial Basin Coal Company, which is the general partner to Colowyo Coal Company L.P. (Colowyo). Therefore, Tri-State on behalf of Colowyo is submitting this adequacy response for minor revision 216 (MR-216) for Permit No. C-1981-019. Tri-State received your adequacy letter dated May 14, 2020, and has prepared the following response:

1. When reviewing proposed Exhibit 7-25A, it was observed that there was a reduction in stem spacing and flow used in the sediment control exemption demonstration. Stem spacing was reduced from 0.86 in. to 0.67 in. and the flow was reduced from 1.17 cfs to 0.36 cfs. Please provide the Division with additional rationale behind the reduction in stem spacing and flow used in the sediment control exemption demonstration.

Response: Many options are available for the SEDCAD user to pick from when developing the stem spacing for a grass filter. It was determined that a Rye Grass (stem spacing 0.67 inches) was more representative of the area modeled for this demonstration versus a Sorghum Grass (stem spacing 0.86 inches) that was previously used. That being said, picking either option in the SEDCAD model does not change the outcome that a grass filter will suffice.

2. There appears to be a typo in proposed Exhibit 27, Item 3 under the second paragraph of Section II with the use of "aCropriate time". Please provide an updated page 1 for the proposed Exhibit 27, Item 3.

Response: The typographical error noted has been corrected.

3. The Division has performed a reclamation cost estimate to reclaim the additional Collom in-pit drill holes and associated drill pads. The total value of this estimate is \$131,225.00 (see attached cost estimate) and is based on the difference of what is proposed under MR-216 and what is currently approved (Task # 470 of the MT-08 RCE). The Division's cost



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estimate is consistent with previous cost estimates approved by both the Division and Colowyo. The Division respectfully requests a response from Colowyo with any questions regarding the cost estimate or an acceptance of the Division's estimate.

Response: Tri-State and Colowyo have reviewed the reclamation cost estimate prepared by the Division, which proposes an increase in the overall reclamation liability by \$131,255.00 and hereby concurs with the cost estimate provided.

If you should have any additional questions or concerns, please feel free to contact Tony Tennyson at (970) 824-1232 at your convenience.

Sincerely,

DocuSigned by:
Daniel Casiraro
B70D69F114324DE...

Daniel J. Casiraro
Senior Manager
Environmental Services

DJC:TT:der

cc: Chris Gilbreath (via email)
Tony Tennyson (via email)
Angela Aalbers (via email)
File: C. F. 1.1.1.199
G471-11.3(21)d



CHANGE SHEET FOR PERMIT REVISIONS, TECHNICAL REVISION, AND MINOR REVISIONS

Mine Company Name: Colowyo Coal Company

Permit Number: **C-1981-019**

Date: **May 14, 2020**

Revision Description: **MR-216 Collom In Pit Drilling**

Volume Number	Page, Map or other Permit Entry to be REMOVED	Page, Map or other Permit Entry to be ADDED	Description of Change
1			No Change
2A			No Change
2B			No Change
2C			No Change
2D			No Change
2E			No Change
3			No Change
4			No Change
5A			No Change
5B			No Change
6			No Change
7			No Change
8			No Change
9			No Change
10			No Change
12			No Change
13			No Change
14			No Change
15			No Change
16			No Change
17			No Change
18A			No Change
18B			No Change
18C			No Change
18D			No Change
19			No Change

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20			No Change
20	Exhibit 27, Item 3 - Page 1 (1 page total)	Exhibit 27, Item 3 - Page 1 (1 page total)	Exhibit 27 has been updated.
21			No Change
22			No Change

I. INTRODUCTION

The Collom Pit Drilling Program will consist of drilling 80 drill holes (Please see Figure Exh. 27-3-1 for drill pad locations) in order to obtain data to enhance the Collom geologic model. The planned drill holes will be drilled over a succession of years, and Colowyo will annually report in the annual reclamation report all drilling that took place for the report year.

An exemption for sediment control for three drill pads is presented in Exhibit 7, Item 25A in Volume 18C.

II. SEALING AND RECLAMATION OF DRILL HOLES, DRILL PADS, AND DRILL ROADS

Drill pads shown on Figure Exh. 27-3-1 and listed on Table Exh. 27-3-1 will have either one single core hole or a combination of a rotary and core drill hole. Drill holes that will be completely or partially mined through, will be reclaimed in accordance with Section 2.05.4(1) in Volume 15. Drill holes that will be drilled outside of the planned mining area will be plugged and abandoned following the completion and logging of each drilling hole.

Topsoil will be removed or windrowed directly adjacent to drill pads. All topsoil that is windrowed will be picked up during the larger stripping effort associated with development of the Collom Pit. Drill roads will use existing ranch roads where possible to limit disturbance, and in areas ranch roads are not available the road to access the drill pad will be brushed only to allow equipment to access each pad location. Most of the drill pads and roads will be mined through, or will be within the larger disturbance footprint associated with the Collom Pit. These drill pad locations and roads will be reclaimed at the appropriate time in accordance with Map 29B and Section 2.05.4 in Volume 15 when mining is complete.

Drill pads C-41, C-59, C-60 and their associated roads will have the topsoil replaced and will be seeded upon completion of the drilling for the year.