



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

1313 Sherman Street, Room 215
Denver, CO 80203

June 11, 2020

Moffat County Mining, LLC
Attn: Miranda Kawcak
29515 Routt County Road #27
Oak Creek, Colorado 80467

RE: Williams Fork Mines, DRMS Permit No. C-1981-044, 2019 Annual Reclamation Report Review

Dear Ms. Kawcak,

The Colorado Division of Reclamation, Mining and Safety (DRMS or Division) received the 2019 annual reclamation report for the above referenced mine site on February 14, 2020. DRMS would like to recognize the significant advancement of the reclamation of the site during this report year conducted by Moffat County Mining, LLC. ("MCM"). The report was reviewed by DRMS for compliance with Rule 2.04.13. Items that will need to be addressed by MCM are shown below in **bold** text. DRMS find the following:

- (1) The report was received on February 14, 2020 prior to the deadline required by Rule 2.04.13(1).
- (2) The name and address of the permittee was included on the annual reclamation report form in accordance with Rule 2.04.13(1)(a). However, the permit number for the site was shown at "C-81-044" on the cover letter of the annual report and on the annual report form. The full permit number for the site is "C-1981-044". When submitting the next annual report, please use the full permit number for the site.
- (3) No acres were reported to have been disturbed during the report year. Rule 2.04.13(1)(b) is complied with.
- (4) 101.9 acres were reported to have been backfilled and graded during this report year. The "Site Activities" section of the annual report cover letter provides a description of the reclamation work that occurred during this report year. However the location of the 101.9 acres reported to have been backfilled and graded is not clearly defined. **Please submit a map that depicts the location of the areas backfilled and graded in accordance with Rule 2.04.13(1)(c).**
 - The 2019 annual report indicates last year's cumulative total of acres backfilled and graded was 305.7. The 2018 annual reclamation report indicated the cumulative total area backfilled and graded was 305.1 acres. This discrepancy of .6 acres does not appear to have been translated into the total cumulative acres backfilled and graded reported on the 2019 form.
- (5) 84.6 acres were reported to have been topsoiled during this report year. **Please submit a map that depicts the location of the areas topsoiled in accordance with Rule 2.04.13(1)(d).**
- (6) The cover letter section titled "Site Activities" indicates half of the area topsoiled in 2019 was seeded with the approved hayland seed mixture ($84.6 \div 2 = 42.3$ acres). However, according to the annual reclamation



report form 26 acres were added during this reporting year to the seeded area with 9 years and less of growth. **In accordance with Rule 2.04.13(1)(e), please clarify the number of acres that were seeded during the 2019 reporting year. Please provide a map that depicts the location of the areas seeded. Finally, please provide seedtags, invoices or other comparable documentation these areas were seeded with the approved seed mixture.**

- (7) MCM reports that 29.7 acres was added to the seeded acres with 10 years or greater of growth bringing the total acres in this category to 288.5 acres. **Please provide a map that depicts the location of these acres and that shows the date of planting for all previously revegetated areas in accordance with Rule 2.04.13(1)(f).**

Additional Annual Report Review Adequacy Items:

- a) **Of the 422 acres affected at the site, MCM reports that 407 acres have been backfilled and graded. Given this, 15 acres (422-407) of affected land remains at the site where reclamation has not been initiated. DRMS assumes these 15 acres are areas where reclamation has not occurred yet and/or areas in long-term facilities. However, MCM reports that 27.6 acres remain in "Non-Permanent" long-term facilities and 2.25 acres of permitted "Permanent" long-term facilities for a total of 29.85 acres in long-term facilities at the close of the 2019 reporting year. This appears to be 14.85 acres (29.85 – 15) more than the area reported to be remaining at the site that has not had any reclamation initiated. Please clarify and/or revise the annual reclamation report form accordingly. Also, it would be helpful if MCM submitted a map that depicts the acreage in long-term facilities.**

This concludes the Division's review of the 2019 annual report. The Division request that MCM address the adequacy review items noted above by **July 6, 2020**. If you have any questions, please contact me at Jared.Ebert@state.co.us or (303) 866-3567 ext. 8120.

Sincerely,



Senior Environmental Protection Specialist
Division of Reclamation, Mining and Safety

ec: Robin Reilley, DRMS