

J. E. STOVER & ASSOCIATES, INC.

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MINE ENGINEERING
MINE RECLAMATION

CIVIL ENGINEERING
CONST. MANAGEMENT

June 25, 2020

Rob Zuber
Division of Reclamation, Mining and Safety
1313 Sherman Street, Room 215
Denver, CO 80203

Re: 2019 Annual Reclamation Report
Adequacy Review #1
Bowie Resources, LLC, Bowie No. 2 Mine
Permit No. C-1996-083

Dear Mr. Zuber:

On behalf of Bowie Resources, LLC, below are the responses to DRMS' adequacy review letter dated June 5, 2020;

1. **DRMS:** On the ARR form, the first line, Acreage in Active Mining Areas, should not contain a value. This line is only relevant for surface mines.

BRL: Please see revised ARR Form.

2. **DRMS:** On the 2019 ARR map, there is a purple polygon in the Refuse Disposal Areas, which has a designated area of 2.0 acres. Within the map key, this area is described as "TR-43, 44 Refuse Disposal Area." Please indicate which entries in the disturbance list of the ARR correlate to this purple polygon on the map.

BRL: The Purple polygon on the map which lists 2.0 acres is due to a correction made in 2012, second line in the ARR form (2.8-2.0), and then re-adjusting the adjustment in 2013, fourth line from the bottom, which notes, 'reverses adjustment made in 2012.

3. **DRMS:** I am trying to determine if the areas that still require reclamation in the Reclamation Cost Estimate (RCE) for the Bowie No. 2 Mine make sense in the context of the acreages in the 2019 ARR and in the context of the Permit Application Package (PAP). In particular, I am looking at the roads affiliated with drill pads.

- a. What tasks within the RCE identify the re-grading work related to those? I see that Task 86 is one of them, but is it the only one? If so, the RCE suggests that 46.7 acres of these light use roads require future grading work (or at least require the bond release for this work). Does that acreage value appear to be correct?

BRL: No. The calculated total road disturbance applicable to Task 86 is 62.83 acres. This does not include Pitkin Mesa Pipeline (4 AC) which is in Tasks 352 and 353 or the Section 5 Road (1.2 AC) which is in Tasks 379 and 380. Task 119 replaces topsoil from stockpile to MR/TR Light Use Roads.

The 62.73 Acres is calculated as follows:

Total Road Disturbance	76.73 Map 9 Data
SL-01 Release	-12.33
SL-02 Release	-1.57
Net Acreage	62.83

- b. In the table of permitted disturbances on Map 9 of the PAP, can you identify which roads were never constructed?

BRL: All roads shown on Map-09 were constructed.

Sincerely,

J. E. Stover

J. E. Stover, P.E.

Consulting Engineer

Colorado Division of Reclamation, Mining and Safety

Annual Reclamation Report for Calendar Year – 2019

Bowie No. 2 Mine	C-1996-083	Bowie Resources, LLC
Mine Name	Permit Number	Permittee
P.O. Box 1488, Paonia, CO 81428		
Address		

This report, required by Rule 2.04.13, is due by February 15 of each year, or other date, as agreed upon by the Division. It should include text, discussion, and maps, at a minimum, in addition to any other reclamation monitoring data as required by the approved permit. The location of the acreage reported under each land status category and year of seeding (if applicable) should be clearly identified on a map included with the report.

Land Category	Last Year's Cumulative Total (from last year's ARR)	This Calendar Year			Cumulative Total
		Acres Added (+)	Acres Subtracted (-)		
Acreage in Active Mining Areas ¹				=	

Land Category	Last Year's Cumulative Total (from last year's ARR)	This Calendar Year			Cumulative Total
		Acres Added (+)	Acres Subtracted (-)		
Acres Disturbed ²	381			=	381
Acres Backfilled and Graded	98.5			=	98.5
Acres Topsoiled	98.5			=	98.5

Acreage in Long-term Facilities ³	Last Year's Cumulative Total (from last year's ARR)	This Calendar Year			Cumulative Total
		Acres Added (+)	Acres Subtracted (-)		
Non-Permanent Facilities	282.5			=	282.5
Permanent Facilities (permitted)				=	
Totals	282.5			=	282.5

Acres Seeded (permanent)	Last Year's Cumulative Total (from last year's ARR)	This Calendar Year			Cumulative Total
		Acres Added (+)	Acres Subtracted (-)		
9 Years and Less	74.2			=	74.2
10 Years and Greater	24.3			=	24.3
Totals	98.5			=	98.5

Bond Release	Last Year's Cumulative Total (from last year's ARR)	This Calendar Year			Cumulative Total
		Acres Added (+)	Acres Subtracted (-)		
Phase I Released	95.2			=	95.2
Phase II Released	45.33			=	45.33
Phase III Released	4.10			=	4.10

¹Includes pits, topsoil stripped areas in advance of pits, and spoil not backfilled and graded

²Surface Mine Acres Disturbed = B&G + Long-Term Facilities + Active Mining Areas; Underground Mine Acres Disturbed = B&G + Long-Term Facilities; Separately-permitted Loadouts = B&G + Long-Term Facilities

³Includes haul, access and light-use roads, temporary dams and impoundments; permanent dams and impoundments; diversion and collector ditches, water and air monitoring sites; topsoil stockpiles; overburden stockpiles; repair, storage and construction areas; office area, repair shops, and parking; coal stockpiles, loading, and processing areas; railroads; coal conveyors; refuse piles and coal mine waste impoundments; head-of-hollow fills; valley fills; ventilation shafts and entryways; and non-coal waste disposal area (garbage dumps and coal combustion by-products disposal areas).