

Simmons - DNR, Leigh <leigh.simmons@state.co.us>

C1980007, West Elk Mine, MR-450, Initial Adequacy Review

1 message

Simmons - DNR, Leigh <leigh.simmons@state.co.us> To: "Welt, Kathy" <KWelt@archrsc.com> Thu, Oct 15, 2020 at 1:16 PM

Attached

Leigh Simmons Environmental Protection Specialist



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

P 303.866.3567 x 8121 | C 720.220.1180 | F 303.832.8106 1313 Sherman Street, Room 215, Denver, CO 80203 leigh.simmons@state.co.us | http://mining.state.co.us/

Adequacy letter, West Elk, MR-450, 1.pdf



Kathleen G. Welt Mountain Coal Company, LLC 5174 Highway 133 Somerset, CO 81434 October 15, 2020

Re: West Elk Mine (Permit No. C-1980-007) Minor Revision No. 450, (MR-450) Initial Adequacy Review

Dear Ms. Welt,

The Colorado Division of Reclamation, Mining and Safety (Division) has completed the initial review of materials submitted by Mountain Coal Company, LLC (MCC) in support of the MR-450 application. The Division's comments and questions are below, with items that need to be addressed highlighted in bold type.

Rule 2.05.3 Operation Plan – Permit Area

 The text proposed to be inserted into the second paragraph of page 2.05-30 begins "Temporary pipes or culverts could also be used to reroute streams while mitigating the impacts of subsidence..." The phrasing implies a general approval of the temporary rerouting of streams, when in fact MR-450 is a response to a specific situation and may not be used to permit actions beyond that immediate response.

Please remove the first sentence of the proposed revised text and begin the remainder of the revised text with a new paragraph.

A Reclamation Cost Estimate for the removal of the temporary pipe is attached for your review. The proposed decision due date for MR-447 is October 25, 2020.

Yours sincerely,

Leigh Simmons Environmental Protection Specialist



COST SUMMARY WORK

User: LDS Agency or organization name: DRMS TASK LIST (DIRECT COSTS) Task Description Size Task Cost 001 Removal of temporary pipe DEMOLISH 1 4.00 \$1,110 SUBTOTALS: 4 \$1,110 INDIRECT COSTS 001 Removal of temporary pipe DEMOLISH 1 4.00 \$1,110 SUBTOTALS: 4 \$1,110 INDIRECT COSTS OVERHEAD AND PROFIT: 1 4.00 \$1,110 Liability insurance: 2.02 Total = \$12 Performance bond: 1.05 Total = \$12 Job superintendent: 2.00 Total = \$139 Profit: 10.00 Total = \$111 TOTAL O & P = \$284 CONTRACT AMOUNT (direct + O & P) = \$1,394 LEGAL - ENGINEERING - PROJECT MANAGEMENT: Financial warranty processing (legal/related costs): \$0 Total = \$0 Engineering work and/or contract/bid preparation: 4.00 Total =<	Task description:	Removal of temporary pipe	e on South Prong (Creek					
Task #: 000 State: Colorado Abbreviation: None Date: 10/15/2020 County: Delta Form Filename: C007-0 User: LDS Agency or organization name: DRMS DRMS Cost Cost Task Description Form Fleet Task Cost Cost 001 Removal of temporary pipe DEMOLISH 1 4.00 \$1,110 SUBTOTALS: 4 \$1,110 INDIRECT COSTS OVERHEAD AND PROFIT: Liability insurance: 2.02 Total = \$12 Performance bond: 1.05 Total = \$12 Job superintendent: 2.00 Total = \$139 Profit: 10.00 Total = \$139 Profit: 10.00 Total = \$111 TOTAL O & P = \$284 CONTRACT AMOUNT (direct + O & P) = \$1,394 LEGAL - ENGINEERING - PROJECT MANAGEMENT: State State State State Financial warranty processing (legal/related costs): S0 State State <th>te: West Elk Mine</th> <th> Permit Action:</th> <th>MR450</th> <th>Perr</th> <th>nit/Job#</th> <th>t: <u>C1980007</u></th>	te: West Elk Mine	Permit Action:	MR450	Perr	nit/Job#	t: <u>C1980007</u>			
Task #: 000 State: Colorado Abbreviation: None Date: 10/15/2020 County: Delta Form Filename: C007-0 User: LDS Agency or organization name: DRMS DRMS Cost Cost Task Description Form Fleet Task Cost Cost 001 Removal of temporary pipe DEMOLISH 1 4.00 \$1,110 SUBTOTALS: 4 \$1,110 INDIRECT COSTS OVERHEAD AND PROFIT: Liability insurance: 2.02 Total = \$12 Performance bond: 1.05 Total = \$12 Job superintendent: 2.00 Total = \$139 Profit: 10.00 Total = \$139 Profit: 10.00 Total = \$111 TOTAL O & P = \$284 CONTRACT AMOUNT (direct + O & P) = \$1,394 LEGAL - ENGINEERING - PROJECT MANAGEMENT: State State State State Financial warranty processing (legal/related costs): S0 State State <th>PROJECT IDENTI</th> <th>ICATION</th> <th></th> <th></th> <th></th> <th></th>	PROJECT IDENTI	ICATION							
TASK LIST (DIRECT COSTS)TaskDescriptionUsedFleetTask SizeCost 001 Removal of temporary pipeDEMOLISH14.00\$1,10SUBTOTALS:4\$1,10INDIRECT COSTSOVERHEAD AND PROFIT:Liability insurance:2.02Total =\$22Performance bond:1.05Total =\$12Job superintendent:2.00Total =\$139Profit:10.00Total =\$139CONTRACT AMOUNT (direct + O & P) =\$1,394LEGAL - ENGINEERING - PROJECT MANAGEMENT:Financial warranty processing (legal/related costs):\$0Total =\$0Engineering work and/or contract/bid preparation: 4.00 Total =\$0\$56	Task #: 000 Date: 10/15/2	State: Colorado				None C007-000			
Fask DescriptionDescriptionForm UsedFleet SizeTask HoursCost001Removal of temporary pipeDEMOLISH14.00\$1,110SUBTOTALS:4\$1,110SUBTOTALS:4\$1,110INDIRECT COSTSOVERHEAD AND PROFIT: Liability insurance:2.02Total =\$22Performance bond:1.05Total =\$12Job superintendent:2.00Total =\$139Profit:10.00Total =\$111TOTAL O & P =\$284CONTRACT AMOUNT (direct + O & P) =\$1,394LEGAL - ENGINEERING - PROJECT MANAGEMENT:Financial warranty processing (legal/related costs):\$0Total =\$0Engineering work and/or contract/bid preparation: 4.00 Total =\$0	Agency or or	anization name: DRMS							
Task DescriptionDescriptionUsedSizeHoursCost001Removal of temporary pipeDEMOLISH14.00\$1,110SUBTOTALS:4\$1,110SUBTOTALS:4\$1,110SUBTOTALS:4\$1,110OVERHEAD AND PROFIT:Liability insurance:2.02Total =\$22Performance bond:1.05Total =\$12Job superintendent:2.00Total =\$139Profit:10.00Total =\$111TOTAL O & P =\$284CONTRACT AMOUNT (direct + O & P) =Sign colspan="4">Total =\$10LEGAL - ENGINEERING - PROJECT MANAGEMENT:Financial warranty processing (legal/related costs):\$0Total =\$0Total =\$0Total =\$0Total =\$0Total =\$0	TASK LIST (DIRECT COSTS)								
SUBTOTALS:4\$1,110SUBTOTALS:4INDIRECT COSTSOVERHEAD AND PROFIT:Liability insurance:2.02Total = $$22$ Performance bond:1.05Total = $$12$ Job superintendent:2.00Total = $$139$ Profit:10.00Total = $$111$ TOTAL O & P = $$284$ CONTRACT AMOUNT (direct + O & P) = $$1,394$ LEGAL - ENGINEERING - PROJECT MANAGEMENT:Total = $$0$ Financial warranty processing (legal/related costs): $$0$ Total = $$0$ Engineering work and/or contract/bid preparation: $$0$ Total = $$0$ State $$1,00$ Total = $$0$	Description		Used	Size Hours					
DEDITIONES.INDIRECT COSTSOVERHEAD AND PROFIT:Liability insurance: 2.02 Performance bond: 1.05 Job superintendent: 2.00 Profit: 10.00 Total = $$12$ Job superintendent: 2.00 Profit: 10.00 Total = $$111$ TOTAL O & P = $$284$ CONTRACT AMOUNT (direct + O & P) = $$1,394$ LEGAL - ENGINEERING - PROJECT MANAGEMENT:Total =Financial warranty processing (legal/related costs): $$0$ Total =SoTotal = $$56$	I Removal of temp	cary pipe	DEMOLISH	1 4.00		\$1,110			
OVERHEAD AND PROFIT:Liability insurance: 2.02 Total = $\$22$ Performance bond: 1.05 Total = $\$12$ Job superintendent: 2.00 Total = $\$139$ Profit: 10.00 Total = $\$111$ TOTAL O & P = $\$284$ CONTRACT AMOUNT (direct + O & P) =\$1,394LEGAL - ENGINEERING - PROJECT MANAGEMENT:Financial warranty processing (legal/related costs): $\$0$ Total = $\$0$ Engineering work and/or contract/bid preparation: 4.00 Total = $\$0$ Total =\$\$0Total = $\$0$ Total = $\$0$ To			<u>SUBTO</u>	TALS:	4	\$1,110			
Financial warranty processing (legal/related costs):\$0Total =\$0Engineering work and/or contract/bid preparation:4.00Total =\$56	Liability ins Performanc	rance: 2.02 bond: 1.05 ndent: 2.00 Profit: 10.00	RACT AMOUNT	Total = Total = Total = TOTAL O & P =	$= \frac{\$12}{\$13} = \frac{\$13}{\$13} = \frac{\$13}{\$28}$	2 39 11 34			
Engineering work and/or contract/bid preparation: 4.00 Total = $$56$	LEGAL - ENGINEER	IG - PROJECT MANAGEMENT	`:						
	Engineering wor	and/or contract/bid preparation:			= \$56				
CONTINGENCY: 0.00 Total = $\$0$		CONTINGENCY:	0.00	Total =	= _\$0				
TOTAL INDIRECT COST =\$384			TOTAL IN	DIRECT COST =	= \$38	34			
TOTAL BOND AMOUNT (direct + indirect) = \$1,494		TOTAL BO	ND AMOUNT (d	irect + indirect) =	= <u>\$</u> 1,	494			

DEMOLITION WORK

Т	ask description	n: Remova	l of temporary pipe	•					
Site:	West Elk Min	e	Permit Action: MR450			Permit/Job#: <u>C1980007</u>			
<u>PROJEC</u>	CT IDENTIF	ICATION							
Task #: Date: User:	001 10/15/2020 LDS Agency of	Sta Coun or organization name:	ty: Delta			Abbreviat Filena		Non C00	e7-001
<u>UNIT CO</u>	<u>STS</u>					Location	<u>adjus</u>	tmen	<u>t: 90.70 %</u>
	re or Item ription	Dimensions	Demolition Me Selection		Quantity	Unit	Uni	-	Total Cost

Job Hours:	4.00	Subtotal (unadjusted):	\$1,223.60	(adju	tal Cost sted for ocation):	\$1,109.81
Temporary pipe	280' x 6"	Pipe, sewer/water diameter pipe	- 12 in. 280.00	LF	\$4.37	\$1,223.60