



TRAPPER MINING INC.

P.O. Box 187

Craig, Colorado 81626

(970) 824-4401

November 16, 2020

Ms. Robin Reilley
Environmental Protection Specialist
Colorado Division of Reclamation, Mining and Safety
1313 Sherman Street, Room 215
Denver, CO 80203

Re: Trapper Mining Inc., Permit No. C-1981-010

Technical Revision TR-126: Midterm Review No. 8 Response; CY Monitor Wells Information; Revised Bond Release Forb Diversity Standard; Incorporation of new NPDES Surface Water Monitoring Requirements; Coyote Pond Spillway Modification; Update Haulroad Certification Section; Cultural Resources Survey Report for West I/J Pits.

Dear Ms. Reilley:

Enclosed is a copy of a technical revision to achieve the above referenced permit updates. The enclosed material includes text, tables and maps that present the proposed changes. Proposed changes and permit updates include:

- Midterm Review No. 8 responses that include 1) an updated well data table, 2) updated blast notification tables, 3) updated surface ownership map and table, 4) several revised pages with cleanup language, 5) updated facilities and hydrology maps, figure and text, 6) an updated officers and directors page and 7) an updated page giving a more accurate estimate of the number of development drill holes in any given year.
- As-built information for the four new CY groundwater wells that will monitor potential impacts from I and J Pits mining.
- An updated groundwater monitoring schedule that includes the new CY wells. Note that Table 2.7-21a that was requested to be updated by the Division has not existed in our permit for many years.
- A revised forb diversity standard that goes from a relative cover value for a single forb species to a relative cover value for all combined forb species. The proposed relative cover value for all combined forb species was arrived at after careful evaluation of historic and recent forb cover values, with particular emphasis on drought years.
- A proposed revision to the Coyote Pond Spillway design that would increase the capacity of the pond to hold I/J Pits groundwater without compromising the integrity or safety of the existing structure. A geotechnical evaluation of Coyote Pond was conducted by Agapito Associates, Inc. that concluded that the embankment would be stable with the increased pond capacity. MSHA review of Coyote Pond stability information concluded that the embankment would remain stable following the spillway modification. An MSHA approval letter is enclosed for your information.

Further, enclosed SEDCAD runs demonstrate that the spillway modification will still meet discharge standards. A proposed spillway modification design is also enclosed. The SEDCAD runs and spillway design are placed in Appendix Q. Prior hydrologic modelling for the Coyote drainage should be removed.

- Haulroad certification information is presented for the new Life of Mine N Pit bypass haulroad in Appendix S.
- A new cultural resources survey was completed by Metcalf Archaeological Consultants, Inc. for the western portion of the I/J Pits complex that will be mined tentatively beginning in 2022. Several sites were found that Metcalf deemed eligible for inclusion on the National Register of Historic Places. These sites are in the far western portion of the mining area and the current plan is to avoid disturbing these sites.

The following revised permit text pages are enclosed and updated as follows:

- 1-5. A new Director for Salt River Project is updated on the enclosed page.
- 3-22. This page is scanned from Trapper's permit document to replace the illegible page in the Division's permit document.
- 3-23. Page updated to give a more accurate estimate of the number of development drill holes in any given year.
- 3-40. Overlooked in the PR-9 application, this page is changed to eliminate mention of "temporarily abandoned D/E pit that shows postmining topography after it is filled with utility ash near the end of mine life."
- 3-43a. This is a reserved place-holder page that was overlooked in the PR-9 application (new).
- 4-13. Reference to utility waste disposal in Enfield Pit removed.
- 4-16. Industrial waste pond operation language modified to indicate abandonment and plugging of discharge structures to make the pond a non-discharge facility.
- 4-121 to 4-121a. Revised forb diversity standard for Phase III bond release.
- 2-241a. Deacon and Jeffway Gulches added to disturbed drainages within the permit area.
- 4-242 and 4-247a. Groundwater monitoring discussion is updated to include the new CY wells.

The following revised permit tables and figure are enclosed:

- Table 2.7-20 (pages 2-456 and 2-457). This groundwater well data table is updated to include the new CY and GD-3 wells.
- Table 3.1-1 (page 3-10). This maximum annual production table is updated through the current coal contract that expires in 2025.
- Table 3.4-1 (page 3-28a). This pre-blast survey table is updated for residents within one-half mile of the Trapper permit boundary.
- Table 3.4-2 (page 3-28b). This table is updated for owners of structures within one-half mile of the Trapper permit boundary.
- Table 3.4-3 (page 3-28c). This table is updated for local government entities to receive annual blasting notices.
- Figure 4.3-1. (page 4-15). Figure revised to show removal of industrial waste pond drain and oil separator (see Map M-13A).
- Table 4.8-3 (page 4-177). Remove defunct Deacon/Jeffway Gulch information from table. Deacon/Jeffway diversion ditch SEDCAD run found in Appendix Q Section XVII should be removed from the permit document.
- Table 4.8-6 (page 4-185). This sediment ponds summary information table is updated for Coyote Pond spillway modification.
- Table 4.8-7 (page 4-189). This embankment designs table is updated for Coyote Pond.
- Table 4.8-8b (page 4-222gg). Change Deacon, Deal and Jeffway from proposed to constructed.

- Table 4.8-11 (page 2-240). Operational Surface Water monitoring Schedule updated with new NPDES Permit.
- Table 4.8-12 (page 2-241). List of water quality parameters to be monitored revised as a result of new NPDES Permit.
- Table 4.8-13a (page 4-245). This table is updated to include the new CY wells into the groundwater monitoring schedule.

The following additions to Appendices are enclosed:

- Appendix K. A cultural resources survey report from Metcalf Archaeological Consultants, Inc. for the west part of the I/J pits complex is added in new Section XIX. An Appendix K-XIX cover page and an updated Appendix K TOC page (Page 2) are included.
- Appendix Q, Section III. Coyote Pond SEDCAD runs are enclosed to demonstrate that water discharge standards are met with the new spillway modification. A detailed Principal Spillway Modification diagram is also enclosed.
- Appendix Q, Section XXXI. Water sampling procedures, revised Part A, Surface Water Procedures is enclosed.
- Appendix S. The Appendix S map is updated and certification added for new road segment.
- Appendix V. Part C. Design and construction information for CY wells is enclosed.

The following revised maps are enclosed:

- M1. This surface ownership map is updated.
- M13A. Re-routed powerline shown in N Pit area.
- M13B. Map revised to show removal of industrial waste pond drain and oil separator (see Figure 4.3-1).
- M45. This cultural resources map is updated to include the new West I/J Pits survey.
- M51 (sheet 3). Deacon/Jeffway diversion ditch is removed.
- M52. Location of new CY wells is included and the map is updated.

Please get back to us with any questions, comments or concerns.

Sincerely,



Graham Roberts
Environmental Supervisor
Trapper Mining Inc.

c Revisions binder
File 109.2.3.4
Jennifer Maiolo, BLM



11/8/2020

**West Region
Lakewood District**

Michael W. Morriss
President & General Manager
Trapper Mining Inc.
P. O. Box 187
Craig, Colorado 81626

RE: Trapper Mine
Mine ID No. 05-02838
Coyote Impoundment
ID No. 1211-CO-09-02838-01
Impoundment Construction Plan:
Modification of Spillway

Dear Mr. Morriss:

The plan modification, dated September 2, 2020, for the referenced impoundment, has been reviewed by MSHA personnel and is approved in accordance with 30 CFR § 77.216-2(b).

The plan modification consists of cover letter, a USGS location map, a JMattern Mining report, a Geotechnical evaluation report by Agapito, and a map of the principal spillway. This modification will be incorporated into the current plan originally approved on September 7, 1977.

The following modification will be made:

1. Requests raising of the Coyote principal spillway from an elevation of 6311, or a little less than six (6) feet.

If you have any questions regarding this approval, please contact John Lewis at 303-231-5558 or this office at 303-231-5458.

Sincerely,

 Digitally signed by
MATTHEW
LEMONS

Matthew L. Lemons
District Manager

cc: Stephen Hinkemeyer