

October 3, 2020

State of Colorado Division of Reclamation, Mining & Safety 1313 Sherman St., Room 215 Denver, CO 80203

Attn: Janet Binns, Environmental Protection Specialist III

"Safety as a Value"

Re: King I Mine, C-1981-035

Stoner Engineering: Quarterly Inspection: Water Quality Improvements

3rd Quarter 2020

Dear Ms. Binns,

Please find enclosed a copy of Stoner Engineering's Quarterly Inspection report of the King I mine water quality improvements for the 3rd quarter of 2020.

Please call Tom Bird at (970) 385-4528 x 6503 or (970) 769-1160 (cell) if you have any questions or comments.

Sincerely,

Tom Bird

Manager, Coal Services

GCC Energy, LLC

Engineering, Testing & Surveying

Date: September 30, 2020

To: Jordan McCourt

Project Coordinator GCC Energy, LLC

6473 County Road 120 Hesperus, CO 81326

(970) 385-4528

From: Ryan Griglak, P.E.

Project Manager

Stoner Engineering & Surveying

Re: King Coal I – Quarterly Water Quality Improvements Inspection



On September 28, 2020, Ryan Griglak, P.E. visited the GCC Energy, LLC King I Mine site to conduct the quarterly inspection of the water quality features installed to prevent contaminated storm water runoff from escaping the site in events smaller than the 100-year storm event.

Both ponds were dry at the time of the inspection and appeared to generally be in good condition (see Pic. 1). The sedimentation gages show the ponds are not yet it need of cleaning (see Pic. 2). The western pond saw an increase in the sediment loading during a storm event since the previous inspection. An additional storm event or two of similar intensity will likely require the sediment pond to have the built-up sediment removed in order to continue to function as originally designed. Consideration for removal of the excess material with dry conditions may warrant performing the work this fall rather than the wetter spring or early summer seasons when the site conditions may become much wetter and more difficult to complete. The ponds should continue to be monitored after storm events to ensure that excess sediment does not reduce the required storage capacity available for storm water runoff.

The sedimentation traps at the entrance to the site are generally in good condition but need some cleaning (see Pic. 3). Work is ongoing for the new haul road along the west side of the property (see Pic. 4). Waste material continues to be placed at the base of the embankment and moved via loader to the top of the pile. The culvert located at the top of the waste embankment pile under the haul road has been partially crushed at its upstream end and should be repaired (see Pic. 5).



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The lower section of the north clear water channel has been reconstructed near the base of the waste embankment pile (below the improvements constructed last year) (see Pic. 6). The relocated channel is now higher on the slope below the disturbance limits. The existing culverts throughout the site were in good condition at the time of the inspection.

The drainage for the overall site appears to be functioning as designed. The drainage features have been constructed and will continue to function as stated in the drainage plan submitted to the Division of Reclamation, Mining & Safety once the ongoing maintenance work resulting from the significant snow accumulation has been completed.

Please let me know if you have any additional questions or concerns in regards to the issues that are discussed above.

Sincerely,

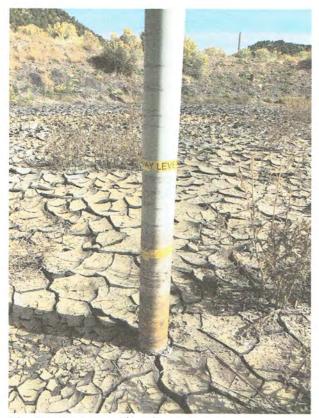
Ryan M. Griglak, P.E.

Project Manager

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Pic. 1 – West pond.



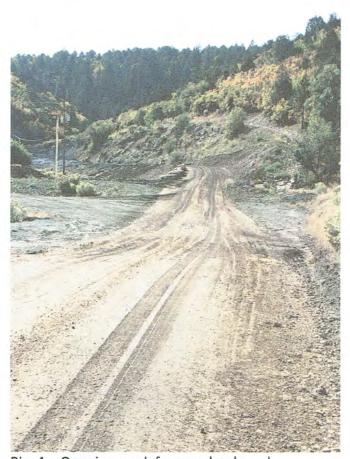
Pic. 2 – West pond sediment gage.

P.O. Box 1163 Tel 970.565.7483

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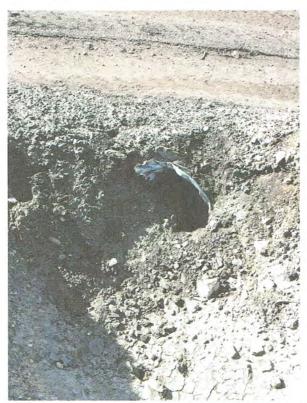


Pic. 3 – Sediment trap at driveway.

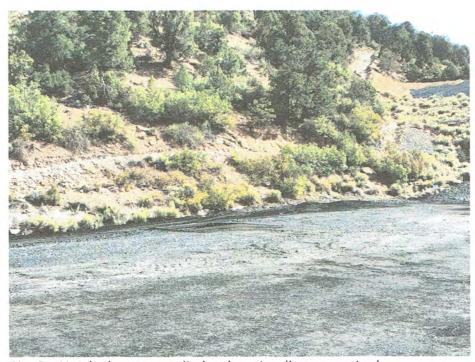


Pic. 4 – Ongoing work for new haul road.

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Pic. 5 – Damaged culvert at top of embankment pile (upstream end).



Pic. 6 – North clear water ditch relocation (lower section).