


TRI-STATE GENERATION AND TRANSMISSION ASSOCIATION, INC.
HEADQUARTERS: P.O. BOX 33695 DENVER, COLORADO 80233-0695 303-452-6111

February 18, 2021

Mr. Zach Trujillo
 Environmental Protection Specialist
 Colorado Division of Reclamation, Mining & Safety
 Department of Natural Resources
 1313 Sherman Street, Room 215
 Denver, CO 80203

RE: Colowyo Coal Company L.P.
Permit No. C-1981-019
Minor Revision No. 229
Adequacy Response

Dear Mr. Trujillo,

Tri-State Generation and Transmission Association Inc. (Tri-State), is the parent company to Axial Basin Coal Company, which is the general partner to Colowyo Coal Company L.P. (Colowyo). Therefore, Tri-State on behalf of Colowyo is providing this adequacy response for minor revision 229 (MR-229) to Permit No. C-1981-019.

Tri-State received your adequacy letter dated February 17, 2021, and has the following response:

1. *The Division has received correspondence from the State Historic Preservation Office (SHPO) regarding the above referenced revision. SHPO has stated that in order to comment, additional information is needed such as the "Year-4 monitoring report" as referenced in the HPA monitoring section of Exhibit 5, Item 3 of the Colowyo PAP. Based on discussions with Colowyo, the Division understands that Colowyo is not requesting to relinquish their commitment to the "Year-4 monitoring report", the monitoring is still ongoing, and is independent to the proposal under MR-229. As discussed with Colowyo, additional information can be provided via map, additional comments and/or discussions with SHPO. Please provide the Division with any necessary information that can assist with clarification on the Colowyo MR-229 for SHPO's review.*

Response: The first 4-year monitoring report was submitted to the Division under MR-210, which was approved by the Division on December 9, 2019. Tri-State refers the Division to Exhibit 5 Item 5A in Volume 16 in the approved permit, which contains the report requested by SHPO. The next 4-year report will be submitted by the end of the year in December 2023 as required in Exhibit 5, Item 3.

The Division is correct that Tri-State is not proposing under MR-229 to remove the requirement to monitor and report on the baseline conditions every 4 years. MR-229 is only proposing to remove the requirement to have an archeologist onsite during topsoil removal.



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Included with this adequacy response is a map (not intended to be part of the permit), which provides the HPA boundary, permitted disturbance boundary, and current disturbance at the end of the year of 2020. No additional disturbance has occurred since the fall of 2020 at Colowyo. This map should help the Division, SHPO, and Tri-State continue the discussion to relinquish the archeologist requirement that is proposed under MR-229.

If you should have any additional questions or concerns, please feel free to contact Tony Tennyson at (970) 824-1232 at your convenience.

Sincerely,

DocuSigned by:
Daniel Casiraro
B70D69F114324DE...
Daniel J. Casiraro
Senior Manager
Environmental Services

DJC:TT:der

Enclosure

cc: Chris Gilbreath (via email)
Tony Tennyson (via email)
Angela Aalbers (via email)
File: C. F. 1.1.1.207 - G471-11.3(21)d

