



February 25, 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. 230**  
**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 230 (MR-230) to Permit No. C-1981-019.

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

- 1. It appears to the Division that an error was found with Table 13C-24 on proposed page Exhibit 13C, page 16. When reviewing the Table 13C-23, the Collom Pit cut volume was increase by 8 million c.y. however, there has been no increase to Table 13C-24 for the volume associated with the Collom Temporary Spoil Pile. Please provide an updated Table 13C-24 to include the additional volume from the Collom Pit cut that will be placed at the Temporary Spoil Pile. If this is not an error, please provide the Division with additional details regarding the additional volume from the Collom Pit cut.*

**Response:** Table 13C-24 has been updated.

- 2. The Division has performed a reclamation cost estimate to reclaim the additional spoil from the Collom Temporary Spoil Pile (see comment 1) associated with the Collom Pit. The total value of this estimate is \$13,061,988.00 (see attached cost estimate). The Division's cost estimate is consistent with previous cost estimates approved by both the Division and Colowyo. The Division respectfully requests a response from Colowyo with any questions regarding the cost estimate or an acceptance of the Division's estimate. Additionally, the Division has provided a "liability tracker" (see Figure 1 below) showing all approved liability increases since MT-8 as well as required liability and liability held by the Division. You will also notice the proposed amount for*



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*the Colowyo Mine TR-145 is included in the "liability tracker" to assist with showing total proposed liability for the Colowyo Mine.*

**Response:** Tri-State has reviewed the cost estimate for MR-230 and does not provide concurrence with the Division's estimate. Tri-State has revised the total amount of material to be placed in the overburden stockpile, and included the revised volumes under the adequacy response. Tri-State requests that the Division recalculate the reclamation cost estimate for MR-230.

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

## CHANGE SHEET FOR PERMIT REVISIONS, TECHNICAL REVISION, AND MINOR REVISIONS

Mine Company Name: Colowyo Coal Company

Date: **February 24, 2021**

Permit Number: **C-1981-019**

Revision Description: **MR-230 Cumulative Bond  
Schedule**

Volume Number	Page, Map or other Permit Entry to be REMOVED	Page, Map or other Permit Entry to be ADDED	Description of Change
1			No Change
2A			No Change
2B			No Change
2C			No Change
2D			No Change
2E			No Change
3			No Change
4			No Change
5A			No Change
5B			No Change
6			No Change
7			No Change
8			No Change
9			No Change
10			No Change
12			No Change
13			No Change
14			No Change
15			No Change
16			No Change
15			No Change
17			No Change
18A			No Change
18B			No Change
18C			No Change
18D			No Change

## CHANGE SHEET FOR PERMIT REVISIONS, TECHNICAL REVISION, AND MINOR REVISIONS

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Permit Number: **C-1981-019**

Date: **February 24, 2021**

Revision Description: **MR-230 Cumulative Bond  
Schedule**

Volume Number	Page, Map or other Permit Entry to be REMOVED	Page, Map or other Permit Entry to be ADDED	Description of Change
19			No Change
20	Exhibit 13C Page 16 (1 page)	Exhibit 13C Page 16 (1 page)	Tables 13C-23 and 13C-24 have been updated.
21			No Change
22			No Change

**Collom Pit and Temporary Spoil Pile**

Tables 13C-23 through 13C- 27 provides the volumes necessary to backfill, regrade and reclaim the Collom box cut and temporary spoil pile.

**Table 13C-23 Collom Pit Backfill**

<b>Area</b>	<b>Cut (Cubic Yards)</b>
<b>Collom Pit</b>	26,000,000

**Table 13C-24 Temporary Spoil Pile Removal**

<b>Area</b>	<b>Total (Cubic Yards)</b>	<b>Haul Distance (feet)</b>	<b>Average Grade (%)</b>
<b>Temporary Spoil Pile</b>	26,000,000	3,940	3

**Table 13C-25 Collom Pit and Temporary Spoil Pile Topsoil**

<b>Area</b>	<b>Acres Disturbed</b>	<b>Topsoil Replacement Volume (Cubic Yards)</b>	<b>Haul Distance (feet)</b>	<b>Average Grade (%)</b>
<b>Collom Pit &amp; Temporary Spoil Pile</b>	513.0	897,530	5,144	3

**Table 13C-26 Collom Pit and Temporary Spoil Pile Revegetation**

<b>Area</b>	<b>Acres to be Reseeded</b>
<b>Collom Pit &amp; Temporary Spoil Pile</b>	593.1