



Twentymile Coal, LLC
Foidel Creek Mine
29515 RCR 27
Oak Creek, CO 80467
970.879.3800

March 10, 2021

Ms. Tabettha Lynch, Environmental Protection Specialist
Division of Reclamation, Mining, and Safety
1313 Sherman Street, Room 215
Denver, Colorado 80203
(303) 866-3567 X 8147

**RE: Twentymile Coal, LLC - Foidel Creek Mine (Permit No. C-82-056), Technical Revision (TR21-96)
Bond Reduction Revision**

Dear Ms. Lynch:

Twentymile Coal, LLC (TC) requests CDRMS approval of a Technical Revision to our existing approved Permit for the reduction in bond held by DRMS for permitted items that were never constructed with no current intention too construct and for a reduction in regrading volumes for the Facilities area based on designed and modeled PMT.

Items that are address by this revision include the regrading of the facilities area, low quality coal pile, employee stockpile, 15Left Shaft construction, Covered Storage Building at the Tipple, Longwall Yard Building, and the Refuse Bin modifications.

- Facilities Area Regrading and Postmining Topography (PMT)
 - The current task 1 of the bond cost estimate (RCE) is unclear as to what is covered in the area for regrading and associated volume. TC has modeled the PMT for the facilities area and has developed a new Map that depicts the area boundaries. To simplify the RCE and future reclamation, TC is proposing that new tasks be developed in the RCE and replace existing tasks that are included in the facilities PMT. The new PMT model incorporates the majority of the direct facilities area and has been broken down into 25 areas. TC is proposing each area be a new task within the RCE. TC has provided two tables that show the old tasks (1) that TC is proposing be replaced by the 25 new tasks (2) that are covered by the PMT model to simplify the identity of the area and distinguish the volumes that will be regraded during reclamation. TC believes the current RCE is over estimating the volume of material to be regraded and by modeling and simplifying these tasks there is a reduction of 477,352 cubic yards of material to be moved during regrading of the facilities area from the original 787,595 cubic yards currently listed in by the tasks in the RCE. PAP text and Maps have been revised and area attached.
- Low Quality Coal Pile
 - With past washplant upgrades and the coal quality of the Wolf Creek seam, Foidel Creek no longer has a low quality coal pile. All of the coal that comes out of the mine is conveyed through the wash plant. Any low quality coal that was in the pile at the time of the washplant upgrades was sent through the washplant and to the BOB pile via the overland conveyor. Any refuse from the low quality coal was hauled to the refuse pile and placed in its final resting area. This explanation was added to the permit in previous revisions, no pages were updated regarding this item in TR96.
- Employee Stock Pile
 - Due to hazards and liabilities the employee coal pile was discontinued and no longer exists. The area shows no remanence of the once existing stockpile. PAP text revisions are attached.

- 15Left Shaft
 - The 15Left shaft and rock dust tank was permitted under TR11-77. In 2013 the pad and access road were constructed. It was later determined that the ventilation shaft, powerline, and rock dust tank were not needed. The shaft was never drilled and no foundations, pads, powerlines or structures were ever erected. TC has no intentions of drilling the 15Left shaft or installing the rock dust tank. These items have been revised in the permit text and TC is purposing the components that have not been constructed be removed from the permit.
- Covered Storage at the Tipple
 - The covered storage building at the tipple was permitted under MR136. This building was never constructed, TC is proposing it be removed from the permit. PAP text and Maps have been revised and are attached.
- Longwall Yard Building
 - The proposed longwall building was permitted under MR310. The permitted building was the warehouse from the Williams Fork Mine. The building was removed from Williams Fork but was never erected at Foidel Creek. TC has no intentions to erect this building and is proposing that it be removed from the permit. PAP text revisions are attached.
- Refuse Bin Modification
 - Under MR311 TC proposed modification to the refuse bin to accommodate for the use of larger haul trucks. TC has not acquired larger haul trucks and has no intention of acquiring larger haul trucks, therefore this modification is no longer needed and TC proposes it be removed from the permit. PAP text revisions are attached.

Detailed design, operations, and reclamation information for the proposed bond reductions is provided as both revised PAP text and revised maps. New and revised PAP materials are identified by the attached Summary of Revisions/Additions.

We would like to proceed with this bond reduction ASAP to accommodate for SI3. We, therefore, appreciate your consideration, cooperation, and assistance in facilitating timely review and approval of this Technical Revision application. After you have opportunity to review the accompanying information, please feel free to contact me with any questions or to discuss submittal materials or related matters.

Sincerely,

Miranda Kawcak
Environmental Manager
mblomquist@peabodyenergy.com
970-870-2718

cc: Sam Anderson (TC)
Kyle Wagner (TC)