



March 11, 2021

Robert Zuber, PE  
Division of Reclamation, Mining and Safety  
1313 Sherman Street, Room 215  
Denver, CO 80203

RE: Keenesburg Mine, Permit C-1981-028  
Response to 2019 AHR Comments

Dear Mr. Zuber:

I am writing in response to your letters dated August 6, 2020 and January 21, 2021. Both letters primarily comment on selenium levels of recent water sampling events at the Keenesburg mine. In 2020, additional water samples were collected, for the 2020 AHR in April and September. This is the same time period of the 2019 samples. One significant change between 2019 and 2020 were the addition of several wells that are part of the CDPHE water sampling program. These wells, named PC-1, 2, 5, 6, provide additional data to the discussion of selenium.

In 2019 and 2020, Well AMW-1 showed similar results for selenium concentrations. AMW-1 is downgradient of historic Pit-B. PC-1, a new well upgradient of historic Pit-B had a Non-Detect in April and a detection in September of 2020. PC-5, PC-6, and SMW-2 are also downgradient of historic Pit-B and had varying results during the sampling periods, including several Non-Detects.

In 2020, additional samples were taken in the area of historic Pit-A, with the upgradient well, PC-1, showing higher concentrations than downgradient well, AMW-2. Additional samples will be needed to review trends, but concern of historic Pit-A impacting water quality is not indicated at this time.

During discussions with AEC, our water sampling consultant, it was discovered that a long-term study of water quality was completed in this area for the USGS. USGS published report WRI 02-4247 that discusses water quality in the area, including selenium levels. This report indicates that the samples collected at the Keenesburg site are within expected levels. During the next several rounds of testing, CEC will commit to studying any trends that develop with regards to selenium concentrations and address DRMS comments as needed. The sampling for 2021 will occur in April and September again.

If you have further questions, please don't hesitate to call or email me. All the sampling data discussed is included in the 2019 and 2020 AHR submitted for review. In addition, sampling reports have been sent to CDPHE for their annual review.

Regards,

Ben Moline, PE  
General Manager, Coors Energy Company