



March 12, 2020

Ben Moline, PE, Senior Manager
Water Resource and Environmental Compliance
Coors Energy Company
1801 California Street, Suite 4600
Denver, CO 80202

**Re: Keenesburg Mine, Permit C-1981-028
2019 Annual Hydrology Report (AHR) – Follow up of DRMS review with a discussion of CEC
response and 2020 data**

Dear Mr. Moline:

The Division received the 2020 AHR for the Keenesburg Mine on March 5, 2021. We also received your response letter to my review of the 2019 AHR on March 11, 2021.

To further assess the potential issue with selenium in groundwater, an issue raised in my review of the Keenesburg Mine 2019 AHR, data from several monitoring wells near the reclaimed B Pit were reviewed. Key dissolved selenium data from the 2020 AHR (April 23, 2020 and April 24, 2020) is as follows:

- The concentration in PC-1 (up gradient) is 0.0759 mg/l.
- The concentration in PC-2 (up gradient) is below the detection limit.
- The concentration in PC-5 (down gradient) is below the detection limit.
- The concentration in PC-6 (down gradient) 0.0717 mg/l.

This data is non-conclusive: there is no clear pattern indicating that high concentrations of dissolved selenium are likely caused by the B Pit.

Furthermore, you referenced a USGS report (WRI 02-4247) that suggests that groundwater east of the Colorado Front Range can naturally contain high selenium concentrations. For example, Table 8 in that report shows that exceedances of the USEPA drinking water standard for selenium (0.05 mg/l) are not prevalent in monitored groundwater, but neither are they uncommon, with 8.6 percent of the observations exceeding the standard. It should be noted that the drinking water standard is higher than the agricultural standard, which I used in my review of the 2019 AHR.

The Division has no further requests regarding the 2019 AHR for the Keenesburg Mine. If you have any questions, please do not hesitate to contact me at Rob.Zuber@state.co.us or 720.601.2276.

Regards,

Robert D. Zuber, P.E.
Environmental Protection Specialist II

