



TRI-STATE

May 19, 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
Technical Revision No. 147 (TR-147)
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 submitting this adequacy response for technical revision 147 (TR-147) to Permit No. C-1981-019.

Tri-State received the Division's adequacy letter dated May 18, 2021 and is providing the following responses:

1. *There appears to be a pagination issue with proposed Volume 15, Table of Contents, page ii and x with the currently approved Volume 15, Table of Contents. Approved page i ends with 2.05.3(5) Topsoil while this section begins on proposed page ii. This shift causes approved page iii not to line up properly with the other sections in the table of contents. Additionally, the shift extends to page x between what is proposed and approved. Please provide an updated Volume 15, Table of Contents to ensure all sections flow correctly.*

Response: Volume 15 table of contents has been updated and provided.

2. *When reviewing Map 19, affected area associated with the proposed highwall mining has been included. However, affected area associated with previously approved highwall mining activities has not been included when comparing to Map 23. Missing areas from Map 19 areas include:*
 - *South Taylor Pit highwall mining block 2013 - 2014 and block 2015,*
 - *East Pit highwall mining block 2003 – 2007,*
 - *West Pit highwall mining block 2005 – 2007, block 2009, block 2005 – 2010.*

Please update propose Map 19 to include all affected areas associated with proposed and previously approved highwall mining activities.



May 19, 2021

Page 2

Response: Map 19 has been updated to reflect previously affected areas by highwall mining as requested.

3. *Reviewing proposed Map 23B, it is observed that highwall mining extends through the West Fork Jubb Creek and the Collom Gulch. No discussion has been included regarding to the potential impacts it may have to the West Fork Jubb Creek and the Collom Gulch. Please provide additional details on whether highwall mining will occur below the mentioned drainages and if so, the potential impacts highwall mining may have to the quantity and quality of surfacewater and groundwater.*

Response: Map 23B has been updated to establish that highwall mining will not impact the West Fork of Jubb Creek and Collom Gulch. Given this reduction in the highwall mining areas, the affected areas on Map 19C have been reduced and updated also.

Included in this adequacy response is a change of index sheet to ease incorporation of this revision into the permit document. 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:

Chris Gilbreath

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Chris Gilbreath
Senior Manager,
Remediation and Reclamation

CG:TT:der

Enclosure

cc: Jennifer Maiolo (BLM-LSFO)
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 L.P.

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

Date: **May 18, 2021**

Revision Description: **TR-147 Collom & South Taylor
Highwall Mining**

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
4			No Change
5A			No Change
5B			No Change
6			No Change
7	Map 19	Map 19	Map 19 has been updated.
8			No Change
9			No Change
10			No Change
12			No Change
13			No Change
14			No Change
15	Table of Contents pages i through x (10 pages)	Table of Contents pages i through x (10 pages)	Volume 15 Table of Contents has been updated.
16			No Change
17			No Change
18A			No Change
18B			No Change
18C			No Change

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

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Revision Description: **TR-147 Collom & South Taylor
Highwall Mining**

Volume Number	Page, Map or other Permit Entry to be REMOVED	Page, Map or other Permit Entry to be ADDED	Description of Change
18D			No Change
19			No Change
20			No Change
21			No Change
22	Map 19C	Map 19C	Map 19C has been updated.
22	Map 23B	Map 23B	Map 23B has been updated.

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Exhibit 5, Item 2	Historic Properties Treatment Plan For Four Sites Within the Proposed Colowyo Collom Mine Expansion Project, Moffat County, Colorado. February 2006, TRC Mariah Associates Inc.
Exhibit 5, Item 3	Treatment and Project Plan for Cultural Resources
Exhibit 5, Item 4	Terminal Segement of the Haul Road for the Colowyo Coal Company's Proposed Collom Mine Township 4 N, Range 93W, Section 22
Exhibit 5, Item 5	Cultural Resource Site Assessment for Colowyo Coal Company L.P., Collom Expansion Project, Moffat County, Colorado, July 25, 2016
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Exhibit 7, Item 21A	Collom Monitoring Well Completion Report
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Exhibit 7, Item 22A	Alluvial Valley Floor Documentation
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Exhibit 9, Item 8	Baseline Survey of Soil Resources Collom Mining Area, Tetra Tech, July 2006
Exhibit 9, Item 9	Prime Farmland Determination Documentation

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Exhibit 10, Item 6	Proposed Collom Coal Mine Project Baseline Vegetation Survey, May 2006, Cedar Creek Associates, Inc.
Exhibit 10, Item 7	Wetlands and Waters of the US Delineation for Collom Project, May 2006, Cedar Creek Associates, Inc.
Exhibit 11, Item 1	Wildlife Survey Report for the Collom Permit Study Area, August 25, 2006, Cedar Creek Associates, Inc.
Exhibit 11, Item 2	2007 Wildlife Monitoring Report for the Collom Permit Study Area, December 20, 2007, Cedar Creek Associates, Inc.
Exhibit 13C within ½ Mile of Collom Mining Area	Cumulative Bond ScheduleExhibit 14, Item 7 Pre-Blast Survey – Structures (Pending)
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Exhibit 23, Item 1	Geotechnical Report – Collom Temporary Spoil Pile and Pond
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