



June 8, 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. 232
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 minor revision 232 (MR-232) to Permit No. C-1981-019.

Tri-State received the Division's adequacy letter dated May 28, 2021, and has the following responses to the Division's concerns:

1. *When reviewing associated proposed Map 13C – Sheet 1 and Map 28C – Sheet 1, Topsoil Pile 25B is not shown. Please update proposed Map 13C – Sheet 1 and Map 28C – Sheet 1 to show the location of proposed Topsoil Pile 25B.*

Response: Table 13C-27 topsoil pile number 25B has been corrected to 25A, which is consistent with Maps 28C Sheet 1 and 13C-Sheet 1.

2. *The Division has performed a reclamation cost estimate to reclaim the additional Collom topsoil stripping and Topsoil Pile 25B. The total value of this estimate is \$646,925.00 (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.*

Response: Tri-State has reviewed the Division's reclamation cost estimate which will increase Colowyo's reclamation liability by \$646,925.00, and hereby provides concurrence with the Division's estimate. As discussed with the Division on June 7, 2021, Tri-State understand that topsoil pile 25B in the reclamation cost estimate is actually topsoil pile 25A, and Tri-State does not need the Division to update the reclamation cost estimate for MR-232 to correct this issue.



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Included in this adequacy response is a change of index sheet to ease incorporation of this minor revision into the permit document. If you should have any additional questions or concerns, please feel free to contact Tony Tennyson at (970) 326-3560 at your convenience.

Sincerely,

DocuSigned by:
Chris Gilbreath
D250C711D0BF450...

Chris Gilbreath
Senior Manager,
Remediation and Reclamation

CG:TT:der

Enclosure

cc: Tony Tennyson (via email)
Angela Aalbers (via email)
File: C. F. 1.1.1.215 - G471-11.3(21)d

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

Mine Company Name: Colowyo Coal Company

Date: **June 7, 2021**

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

Revision Description: **MR-232 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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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 17 (1 page)	Exhibit 13C Page 17 (1 page)	Table13C-27 has been updated.
20			No Change
21			No Change
22			No Change

Table 13C-27 Topsoil Stockpile Revegetation

Topsoil Stockpile Number	Acres to be Reseeded
25A	50.9
26B	2.2
26A	24.2
36A	4.1

Table 13C-28 Collom In-Pit Drill Holes

Drill Hole Number	Plugging Requirements
Please see Exhibit 27, Item 3	

Table 13C-29 Collom Pit Power Distribution

Task	
Remove Power Lines	16,897 Feet
Topsoil Replacement	25,000 Cubic Yards
Reseed Disturbance	10.7 Acres

Table 13C-30 Clean Water Diversions

Clean Water Diversion	Overburden Replacement (cubic yards)	Topsoil Replacement (cubic yards)	Acres to be Reseeded
CWD-1	5,923	4,998	4.3