



June 15, 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. 233
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 233 (MR-233) to Permit No. C-1981-019.

Tri-State received your adequacy letter dated June 14, 2021 and has the following response to the Division's concern:

- 1. Please provide an updated proposed page 4-33 to include the changes approved with Colowyo Mine MR-232.*

Response: The approved MR-232 changes have been incorporated into MR-233, and pages 4-31 through 4-33 has been provided to ensure correct pagination between approved MR-232 and MR-233.

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:
A handwritten signature in blue ink that reads "Chris Gilbreath".
D250C711D0BF450...

Chris Gilbreath
Senior Manager,
Remediation and Reclamation

CG:TT:der



TRI-STATE

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Enclosure

cc: Tony Tennyson (via email)
Angela Aalbers (via email)
File: C. F. 1.1.1.216 - G471-11.3(21)d

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

Mine Company Name: Colowyo Coal Company

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

Date: **June 14, 2021**

Revision Description: **MR-233 Tri-State Power Line**

Volume Number	Page, Map or other Permit Entry to be REMOVED	Page, Map or other Permit Entry to be ADDED	Description of Change
1	Page 4-31 through 4-33 (3 pages)	Page 4-31 through 4-33 (3 pages)	Section 4.12 has been updated.
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

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

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Revision Description: **MR-233 Tri-State Power Line**

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
20					No Change
21					No Change
22					No Change

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the mine access road on the North side of the road. This line provides power to the Gossard Loadout Area and associated facilities in the Axial Basin.

In 2012, approximately 5 acres within Colowyo's permit boundary was affected by the moderate intensity fire as shown on Figure 4.12-1. The area is comprised of a mix of wheatgrass and low density sagebrush. Additional surface disturbances within the permit boundary were created as a result of the necessity to facilitate replacement of the broken power pole, re-hanging of the lines, and access corridors on the Western and Eastern side of the fire for construction of the fire lines. Approximately 26 additional acres burned outside of Colowyo's permit boundary on Colowyo private property, primarily in low density sagebrush rangeland. A few acres of inactive wheat fields were also burned comprised mostly of volunteer winter wheat.

The relatively low intensity nature of the fire does not appear to warrant or require supplemental seeding within the permit boundary, however the areas impacted by the fire line and power pole repair access will be smoothed over as soon as possible and broadcast seeded with the approved sagebrush steppe reclamation seed mix as fall approaches.

In 2013, approximately 0.96 acres within Colowyo's permit boundary (outside the disturbance boundary) were affected by a small intensity wildland fire shown on Figure 4.12-2. The area that was affected was comprised of a mix of Gambel's Oakbrush, Mountain Mahogany, and low density sagebrush. A small area of 2011 reclamation was disturbed by Colowyo personnel to create an access to the fire and to also create a fire line to control the fire from spreading. Colowyo promptly repair the access road through the reclamation and reseeded it with the approved seed mixture soon after extinguishing the fire.

Tri-State Generation and Transmission Association, Inc. (Tri-State), owns and operates a 345 kV power line which is located within the permit boundary and is shown on Maps 21, 22, and 22A. Tri-State requires access to maintain their power line, and will at their discretion improve existing ranch roads and/or construct new roads to access their power line within the permit boundary. Any ground disturbing activities associated with Tri-State's 345 kV line are outside of Colowyo's permitted disturbance boundary, and are not related to Colowyo's mining activities. Therefore, these activities are not required to be permitted and bonded for in accordance with Rule 3.02.1(2).

In February of 2016, the Colowyo Mine site experienced a very high wind event which snapped a power pole off at the base and left the power pole dangling from the line. Colowyo constructed an emergency road into the pole location (0.4 acres of disturbance) to access the location, stabilize the line, and replaced the broken pole. Topsoil was windrowed with a dozer down gradient of the road footprint to minimize surface water flow from the area of disturbance to native areas. Once ground conditions allow access, the entire road footprint will have the topsoil re-spread on the area, and it will be seeded in accordance with the approved reclamation seed mixture. Please see Figure 4.12-4 for a location of the emergency road that was constructed to repair the power pole.

In 2016, the Inactive Mine and Reclamation Program (IMR) began a drilling program to define the burn limits to abate an underground mine fire at the abandoned underground workings at the Axial Mine. The Axial Mine workings are shown on Map 22 and are labeled as the Red Wing Mine. The Axial Mine and Red Wing Mine shared common workings. The drilling project will create ground disturbance within the permit boundary to support the drilling program. These disturbances may include but are not limited to temporary roads, drill pads, and mud pits. The

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final locations to be disturbed will be determined by IMR. These ground disturbing activities are not associated with the Colowyo's mining activities, and will not be required to be permitted nor bonded for in accordance with Rule 3.02.1(2).

In 2016, approximately 4 acres within Colowyo's permit boundary was affected by the moderate intensity wild land fire. The location of the fire is shown on Figure 4.12-5. The area that was burned is mostly comprised of Gambel's Oakbrush and low density sagebrush. Additional surface disturbance within the permit boundary of approximately 1.4 acres was created to cut in a fire line to control and fight the fire. The relatively low intensity nature of the fire does not appear to warrant or require supplemental seeding; however, the area impacted by the fire line will be smoothed over and seeded with the approved reclamation seed mix.

In the fall of 2016 and spring of 2017 White River Electric Association (WREA) installed and removed power lines located within the Colowyo permit boundary. The power lines that were serviced are located adjacent the Gossard Loadout facility (an overhead line will be buried) and Jubb Creek (new overhead line) north towards Moffat County Road 32. These power lines that were installed and removed are owned and operated by WREA. The final locations that will be serviced and potentially create ground disturbance will be determined by WREA. These ground disturbing activities are not associated with the Colowyo's mining activities, and will not be required to be permitted nor bonded for in accordance with Rule 3.02.1(2).

In 2017, Chevron dug up and capped an existing unused oil line in several locations just south of the Gossard Loadout facilities within the Colowyo permit boundary. These ground disturbing activities are not associated with the Colowyo's mining activities, and will not be required to be permitted nor bonded for in accordance with Rule 3.02.1(2).

At various times during the mine life of the Colowyo operation, Colowyo as a private landowner, will construct new ranch roads and/or repair or upgrade existing ranch roads within the permit boundary. These activities are not associated with the mining operation and will only occur outside of the permitted disturbance boundary. Please see Maps 19, 19B, and 19C for the permitted disturbance areas. The construction and/or repairs to these ranch roads will facilitate ongoing private landowner activities including ranching, grazing, hunting, and access for other entities which hold right of ways within the permit boundary. These ranch roads activities are not associated with Colowyo's mining activities, and will not be required to be permitted nor bonded for in accordance with Rule 3.02.1(2).

White River Electric Association (WREA) will construct, operate, and maintain a 69 kV power line from the Axial Basin substation adjacent to State Highway 13 to the Collom facilities area. This power line will be wholly owned by WREA. The ground disturbing activities associated with construction of the power line, including pole locations and roads to pole locations, are not associated with Colowyo's mining activities, and will not be required to be bonded in accordance with Rule 3.02.1(2). The power line will service the area post-mining in Collom.

Tri-State Generation and Transmission Association, Inc. (Tri-State) owns and operates the Axial Basin Substation, which provides electrical services locally in the Axial Basin area including to Colowyo. Tri-State will be expanding the footprint of the substation within the permit boundary on the east and west side of the current substation location. The ground disturbing activities from

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the expansion of the Axial Basin Substation are not associated with Colowyo's mining activities, and will not be required to be permitted nor bonded for in accordance with Rule 3.02.1(2).

In 2018, approximately 22 acres within Colowyo's permit boundary (outside of the disturbance boundary) was affected by the wild land fire caused by a lightning strike. The location of the fire is shown on Figure 4.12-6. The area that was burned is mostly comprised of pinyon juniper and low-density sagebrush. Because the fire was not related to Colowyo's mining activities, Colowyo, as the surface landowner will reseed or managed the post-fire area, as it deems appropriate.

In 2019, the surface landowner replaced a culvert under the Taylor Creek Access Road (please see Map 25C for location of the road) to support long-term access up the Taylor Creek drainage. Minimal ground disturbance was associated with replacing the culvert. Since the activity is related to the surface landowner, it is not permitted and bonded for in accordance with Rule 3.02.1(2).

In 2019, approximately 13.5 acres within Colowyo's permit boundary (outside of the disturbance boundary) adjacent to the Collom Haul Road was affected by the wild land fire caused by high winds slapping power lines together. The location of the fire is shown on Figure 4.12-7. The area that was burned is mostly comprised of sagebrush. Because the fire was not related to Colowyo's mining activities, Colowyo, as the surface landowner will reseed or managed the post-fire area, as it deems appropriate.

Tri-State Generation and Transmission Association, Inc. owns and operates a 138kV power line that traverses through the east portion of the permit boundary. The 138kV line runs north to south through the reclaimed East Pit, and just east of the reclaimed Section 16 Pit. To ensure access to all pole locations along the power line for maintenance and emergency repairs, Tri-State will be improving existing ranch roads and/or constructing new roads to access their power line within the permit boundary. Most of this activity will take place south of the reclaimed East Pit and outside of Colowyo's ground disturbance and reclamation areas. Nonetheless, some of these access locations will traverse across Phase III released areas (Section 16 reclamation areas) and reclaimed areas including reclamation units EP056 and EP060 (please see annual reclamation report maps for the location of these reclamation units). For the approximate alignment for this access road please see Map 22A. Since these ground disturbing activities are not related to Colowyo's mining activities, the roads will not be permitted and bonded for in accordance with Rule 3.02.1(2).

In July of 2020, a wild land fire (named the Streeter Fire) started burning within Colowyo's permit boundary (outside of the disturbance boundary) north of the lower segment of the Streeter Ditch and Streeter Pond. The fire continued to burn north outside of Colowyo's permit boundary. The area that was burned within the permit boundary is mostly comprised of pinyon junipers and sagebrush. Because the fire was not related to Colowyo's mining activities, Colowyo, as the mine operator is not responsible for starting the fire nor managing the areas burned post fire. The surface landowners impacted by the fire will manage the post-fire area, as they deem appropriate.

In 2021, White River Electric Association upgraded their existing power line within the permit boundary and added to this existing line along Moffat County Road 51 to service customers in the area of Wilson Creek. All ground disturbing activities associated with the upgraded power line and the new power line construction is associated with White River Electrical Association and not Colowyo; therefore, it is not permitted for Colowyo nor required to be bonded for in accordance with Rule 3.02.1(2).