



STATE OF  
COLORADO

Zuber - DNR, Rob <rob.zuber@state.co.us>

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## RN-08 adequacy review

1 message

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**Zuber - DNR, Rob** <rob.zuber@state.co.us>  
To: "Moline, Ben" <ben.moline@molsoncoors.com>

Wed, Jul 14, 2021 at 9:38 AM

Hello, Ben

Please see the attached letter and let me know if you have questions and/or comments.

Rob

**Rob Zuber, P.E.**  
**Environmental Protection Specialist II**  
Active Mines Regulatory Program



**COLORADO**  
Division of Reclamation,  
Mining and Safety  
Department of Natural Resources

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**RN8\_DRMS\_Prelim\_Adeq\_Review\_with\_RCE\_Summary.pdf**  
537K



**COLORADO**  
Division of Reclamation,  
Mining and Safety  
Department of Natural Resources

1313 Sherman Street, Room 215  
Denver, CO 80203

July 14, 2021

Ben Moline, P.E., Senior Manager  
Water Resources, Environmental Compliance & Renewable Policy  
Molson Coors Brewing Company  
P.O. Box 4030  
Golden, CO 80402

**Re: Keenesburg Strip Mine (Permit No. C-1981-028),  
RN-08 Preliminary Adequacy Review (PAR)**

Dear Mr. Moline:

The Division has completed its preliminary review of a permit renewal (RN-08) for the Keenesburg Strip Mine in accordance with Rule 2.08.5. The review included the application form and other materials submitted by Coors Energy Company (CEC) on May 7, 2021, as well as the Permit Application Package (PAP) for this mine. The Division has identified the following items that require an additional submittal or clarification.

**Application Form**

1. On page 1 and in other locations in the application, please change the name of the mine to “Keenesburg Strip Mine” (rather than “Keenesburg Mine”).
2. The proposed renewal term is listed as 10 years on page 3. Please update the form and revise this to 5 years.
3. Please confirm the acreages on page 3, and insure that there are no discrepancies with recent Annual Reclamation Reports for this permit.
4. After making revisions to the form, please mail a hard copy with an original signature to the Division office on Sherman Street (in addition to an electronic submittal of your entire response to this PAR).

**PAP Table of Contents**

5. Please confirm if all listed appendices in the Table of Contents are still a part of the current PAP. As appropriate, please update the Table of Contents. For example, Appendix A-4 (Access Road Easement Sheet 1) is not readily available in the Division’s document imaging system.



**PAP Text**

6. Some of the submitted pages do not appear to be correct, or they require explanation. Please check the following and revise as necessary.
- a) Regarding Section 2.03.4, it appears that pages 4b and 4c are missing.
  - b) Regarding Section 2.05.3, it appears that page 103 is missing.
  - c) Regarding Section 2.05.4, please explain why the subsection Determining Final Revegetation Success (pages 125 and 126) was changed significantly from the currently approved pages. (It is possible that errors were made in the processing of TR-47 in 2020.)
  - d) Please check the page numbers for Section 2.05.4(2).

**PAP Appendices and Maps**

7. Please update Appendix M-1, Existing Surface Features Map, to indicate the current conditions on the site. For some areas, it would be sufficient to add the word "Reclaimed" to the labels. The Division recommends removing the topography that indicates that Topsand Piles still exist, or adding information to the map indication that the topography is pre-reclamation.

Attached to this letter is a summary from an update of the Reclamation Cost Estimate for the Keenesburg Strip Mine. Please let me know if you would like to review the entire estimate. The updated liability is \$1,201,563.00. The active corporate surety for this site is \$1,197,459.85, and additional surety will be needed, per our estimate. We can discuss this more in the near future or after this permit renewal is approved by the Division (following the adequacy process).

If you have any questions or comments, please do not hesitate to contact me at [Rob.Zuber@state.co.us](mailto:Rob.Zuber@state.co.us) or 720.601.2276.

Sincerely,



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

*Enclosure: CIRCES Cost Summary*

## COST SUMMARY WORK

Task description: RN-08 Cost Summary

Site: Keenesburg Strip Mine

Permit Action: RN8

Permit/Job#: C1981028

### PROJECT IDENTIFICATION

Task #: 000

State: Colorado

Abbreviation: None

Date: 7/13/2021

County: Weld

Filename: C028-000

User: RDZ

Agency or organization name: DRMS

### TASK LIST (DIRECT COSTS)

Task	Description	Form Used	Fleet Size	Task Hours	Cost
A01	Backfill B-Pit	SCRAPER1	1	141.15	\$335,349
A03	Final Grade Long-Term Spoil Area	GRADER	1	25.98	\$5,016
A04	Final Grade Topsoil Stockpile Area and Parcel 34 Topsoil	GRADER	1	17.75	\$3,612
A05	Final Grade "Other Areas" (parcels 42 and 43)	GRADER	1	6.11	\$1,244
C02	Rip 10,480 feet of internal roads	RIPPER	1	6.49	\$2,196
C05	Regrade Internal Roads	GRADER	1	2.90	\$577
E01	Topsoil B-Pit (PII release Parcle 31,32,& 33)	SCRAPER1	1	48.38	\$129,828
E02	Topsoil Long Term Spoil Area and Parcel 25	SCRAPER1	1	77.41	\$214,415
E03	Haul topsoil to "Other Areas" (parcel 42 and 43)	SCRAPER1	1	11.06	\$18,242
E05	Haul topsoil to interior access roads	SCRAPER1	1	21.01	\$34,643
F01	Seed 152.49 acres of disturbed area. (no PII bond rel)	REVEGE	1	70.00	\$101,911
F01a	Seed 29.82 acres Phase II release (parcels 31,32,33)	REVEGE	1	15.00	\$15,071
G01	Structural demolition	DEMOLISH	1	8.00	\$4,005
H01	Seal 7 wells	BOREHOLE	1	16.00	\$9,872
I01	Clean sediment from Pond 2, dispose in B-Pit	TRUCK1	1	1.38	\$857
I02	water monitoring	SITEMAINT ENANCE	1	30.00	\$27,642
J01	Mobilization and Demobilization of Equipment	MOBILIZE	1	15.60	\$40,435
<b><u>SUBTOTALS:</u></b>				<b>514.22</b>	<b>\$944,915</b>

### INDIRECT COSTS

#### OVERHEAD AND PROFIT:

Liability insurance: 2.02

Performance bond: 1.05

Job superintendent: 257.11

Profit: 10.00

Total = \$19,087

Total = \$9,922

Total = \$18,520

Total = \$94,492

TOTAL O & P = \$142,020

CONTRACT AMOUNT (direct + O & P) = \$1,086,935

#### LEGAL - ENGINEERING - PROJECT MANAGEMENT:

Financial warranty processing (legal/related costs): \$500

Engineering work and/or contract/bid preparation: 6.00

Total = \$500

Total = \$65,216

Reclamation management and/or administration:	<u>4.50</u>		<u>\$48,912</u>
CONTINGENCY:	0.00	Total =	<u>\$0</u>
		TOTAL INDIRECT COST =	<u>\$256,648</u>
		<b>TOTAL BOND AMOUNT (direct + indirect) =</b>	<b><u>\$1,201,563</u></b>