



August 10, 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. 149 (MR-149)
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 149 (TR-149) to Permit No. C-1981-019.

Tri-State received the Division's adequacy letter dated August 9, 2021, and has the following responses to the Division's concerns:

1. *It appears that there is a text flow error on proposed page Volume 18C, Table of Contents. Exhibit 14, Item 7 has been shifted to be combined with Exhibit 13C within the Table of Contents. Please provide an updated Volume 18C, Table of Contents.*

Response: This issue noted has been corrected, and the Volume 15 List of Exhibits has been provided accordingly.

2. *It is the Division's understanding that the currently approved Volume 20, Exhibit 24, Item 1 is now being removed from the Colowyo PAP and incorporated/renamed to the proposed Volume 18C, Exhibit 7, Item 25E. To ensure all information within Volume 20, Exhibit 24, Item 1 is being incorporated into the proposed Volume 18C, Exhibit 7, Item 25E, please provide the remaining SedCAD model demonstrations for the additional culverts found under this exhibit of the Colowyo PAP.*

Response: The Division notes in this comment that the culvert information is being moved to Volume 18C, Exhibit 7, Item 25E. This statement is not correct. The culvert information for the Collom Haul Road has been moved to Volume 18C Exhibit 7, Item 25F. Per the Division's request to move additional SEDCAD™ models from Volume 20 Exhibit 24, Item 1, the appropriate SEDCAD™ models for Exhibit 7, Item 25F have already been provided. For further documentation of this, please refer to the citations to culvert 16 and corresponding



TRI-STATE

August 10, 2021

Page 2

SEDCAD™ model included in Volume 18C Exhibit 7, Item 25F – *General Culvert Design* narrative (Page Exh. 25F-2).

3. *There appears to be a discrepancy between the proposed increase in permitted disturbed acreage to the total disturbed and reseeded acreage included with the haul road channels under Exhibit 13C. The acreage included for the channels under Exhibit 13C is 3.55 acres. The total disturbed acreage provided with the application for TR-149 is 1.2 acres. Please confirm this acreage and provide additional information regarding the difference or please provide the Division with the correct disturbed acreage associated with the Colowyo Mine TR-149.*

Response: Both disturbance acreages presented to the Division are correct. For the overall disturbance acres for entirety of Colowyo, 2.35 acres of the 3.55 had already been permitted for disturbance. The additional 1.2 acres were outside of the overall disturbance limits permitted previously for Colowyo. The acreage included in Exhibit 13C (3.55 acres) had not previously been bonded for disturbance, even though some (2.35 acres) were already permitted for disturbance by Colowyo.

4. *The Division has received a request for additional information regarding Colowyo TR-149 from the Office of Archaeology of Historic Preservation (SHPO) on August 6, 2021. The Division has submitted the information provided under Colowyo TR-149 to SHPO for their review. Any comments and/or questions from SHPO will be provided in an additional future adequacy letter form the Division as necessary.*

Response: Should the Office of Archaeology of Historic Preservation (SHPO) have any additional comments that Tri-State may need to address, they will be addressed as soon as another adequacy letter is provided.

5. *The Division has performed a reclamation cost estimate to reclaim the proposed Collom Haul Road channels. The total value of this estimate is \$3,506.00 (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 cost estimate provided by the Division to increase Colowyo's reclamation liability by \$3,506.00, and hereby provides it's concurrence with the Division's cost estimate.

Included in this adequacy response is a change of index sheet to ease incorporation of this adequacy response 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.



August 10, 2021

Page 3

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)b

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

Mine Company Name: Colowyo Coal Company

Date: **August 10, 2021**

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

Revision Description: **TR-149 Collom Haul Road
BMPs**

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	List of Exhibits pages ix (1 page)	List of Exhibits pages ix (1 page)	List of Exhibits has been updated.
16			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

Mine Company Name: Colowyo Coal Company

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

Date: **August 10, 2021**

Revision Description: **TR-149 Collom Haul Road
BMPs**

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			No Change
21			No Change
22			No Change

LIST OF EXHIBITS

Volume 18C

Exhibit 7, Item 23	Sediment Control Plan Parts J – M
Exhibit 7, Item 25	Collom Post Mine Channel Design
Exhibit 7, Item 25A	Collom In Pit Drilling Small Area Exemption
Exhibit 7, Item 25B	Collom Topsoil Depth Testing Small Area Exemption
Exhibit 7, Item 25C	Temporary Access Road Small Area Exemption
Exhibit 7, Item 25D	Power Line Light-Use Road Small Area Exemption
Exhibit 7, Item 25E	Collom Haul Road Channels
Exhibit 7, Item 25F	Collom Haul Road Culverts

Volume 18D

Exhibit 7, Item 26	Collom Pond As-Builts
--------------------	-----------------------

Volume 19

Exhibit 9, Item 8	Baseline Survey of Soil Resources Collom Mining Area, Tetra Tech, July 2006
Exhibit 9, Item 9	Prime Farmland Determination Documentation

Volume 20

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	Cumulative Bond Schedule
Exhibit 14, Item 7	Pre-Blast Survey – Structures within ½ Mile of Collom Mining Area (Pending)
Exhibit 14, Item 8	Pre-Blast Survey – Offering Letters (Pending) Pre-Blast Structure Locations Drawing (Pending)