



STATE OF
COLORADO

Simmons - DNR, Leigh <leigh.simmons@state.co.us>

C1980007, West Elk Mine, SL-13, Second Adequacy Review

1 message

Simmons - DNR, Leigh <leigh.simmons@state.co.us>

Fri, Sep 3, 2021 at 4:39 PM

To: "Poulos, Nicki" <npoulos@archrsc.com>

Cc: "Welt, Kathy" <KWelt@archrsc.com>, "Wilczek, Jessica" <jwilczek@archrsc.com>

Nicki,

My review of your response to the initial adequacy review is attached. There are a few small items still to be addressed, but we're getting closer!

Please contact me if you have any questions.

Leigh Simmons
Environmental Protection Specialist



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

P 303.866.3567 x 8121 | C 720.220.1180 | F 303.832.8106

1313 Sherman Street, Room 215, Denver, CO 80203

leigh.simmons@state.co.us | <https://drms.colorado.gov>



Adequacy letter, West Elk, SL-13, 2.pdf

143K



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

Nicki Poulos
Mountain Coal Company, LLC
5174 Highway 133
Somerset, CO 81434
September 3, 2021

Re: West Elk Mine (Permit No. C-1980-007)
Surety Release No. 13, (SL-13)
Second Adequacy Review

Dear Ms. Poulos,

The Colorado Division of Reclamation, Mining and Safety (Division) has completed the review of the August 16th response to the SL-13 initial adequacy review letter. Please respond to the adequacy items below.

1. The 17-08a and -08b pad has been included in the revised version of Table 1.
The response is sufficient.
2. The E2-34 access road will not be included in the SL-13 application.
Please edit Table 1 to remove the "& Access Road" text. Please also verify the acreage of the E2-34 pad (it appears to be less than 1.95 acres, based on satellite imagery).
3. E2-51, -52 and -54 have been withdrawn from the SL-13 application.
The response is sufficient.
4. E2-13 has been withdrawn from the SL-13 application.
The response is sufficient.
5. The pad associated with the E4-80.5, -81.5 and -83 holes has been added to Table 1 and is included in the SL-13 application.
The response is sufficient.
6. The pad associated with the E3-68 and -72 holes has been withdrawn from the SL-13 application.
The response is sufficient.
7. The pad and spur road associated with the E3-64 and -65 holes will not be included in the SL-13 application.
Please edit Table 1 to remove the "E3-64, E3-65" line item.



8. The pad associated with the E3-51 hole has been withdrawn from the SL-13 application.
The response is sufficient.
9. The pad associated with the E3-29 hole has been withdrawn from the SL-13 application.
The response is sufficient.
10. The pad and access road associated with the E4-68 hole will be included in the SL-13 application.
Please edit Table 1 to include a line item for E4-68.
11. Box Canyon road will be included in the SL-13 application. A line item has been added to the revised version of Table 1.
The response is sufficient.
12. The following holes have been withdrawn from the SL-13 application. (The three wells have been included in SL-14)
 - RPEE I12-04
 - RPEE I12-05
 - Well 96-2-2
 - Well SOM-3B
 - Well SOM-3E

The response is sufficient.

13. "West Flatiron Road" will be included in the SL-13 application.
The response is sufficient.
14. "Portal Investigation Holes – Lick Creek" comprise holes 10LC01 and 10LC02. They were drilled in the existing roadway and have no associated disturbance. As such the only reclamation tasks associated with them must be Plugging and Abandonment. This is a similar situation to the holes discussed in item 12 of this list.
Please withdraw holes 10LC01 and 10LC02 from SL-13 and include them with the SL-14 partial phase I bond release application.
15. Table 1 has been revised to include the acreage associated with each itemized disturbance. Although further edits will be necessary to the table, the inclusion of a column for acreage means that the response to this item is sufficient.

Yours sincerely,



Leigh Simmons
Environmental Protection Specialist

CC: Kathy Welt, Jessica Wilczek