



STATE OF
COLORADO

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

Renewal for Bowie #2

1 message

Zuber - DNR, Rob <rob.zuber@state.co.us>
To: Basil Bear <basilbear@wolverinefuels.com>

Wed, Nov 24, 2021 at 8:24 AM

Hello, Basil

Attached is my preliminary adequacy letter for Bowie #2. As always, email me or call me with questions or comments.

Have a great holiday. I will be off tomorrow and Friday, and back to work Monday.

Rob

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



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

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Preliminary_Adequacy_RN5_with_RCE_summary.pdf
682K



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

1313 Sherman Street, Room 215
Denver, CO 80203

November 24, 2021

Basil Bear
Bowie Resources, LLC
P.O. Box 1488
Paonia, CO 81428

**Re: Bowie No. 2 Mine (Permit No. C-1996-083),
RN-05 Preliminary Adequacy Review (PAR)**

Dear Mr. Bear:

The Division has completed its preliminary review of a permit renewal (RN-05) for the Bowie No. 2 Mine in accordance with Rule 2.08.5. The review included the application form and other materials submitted by Bowie Resources, LLC (BRL) on September 23, 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. Please confirm the acreages in the application form, and explain any discrepancies with recent Annual Reclamation Reports (ARRs) or other documents related to this permit. For example, the area reclaimed in the previous permit period is quantified as 96.9 acres, but recent ARR's indicate fewer acres. Another example is the number of acres that have been bond released; the application indicates no acres have been released, however the application should reflect the acreages released by SL-01 and SL-02. 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 Text, Appendices and Maps

2. Vol I, Section 2.03.6 - In the adequacy response, please indicate if all right of entry and lease agreements are current. If they are not current, please update the PAP accordingly.
3. Vol I, Section 2.04.11 - In the adequacy response, please indicate if the Threatened and Endangered Species discussion in this section (including the table of species) is based on current lists issued by the U.S. Fish and Wildlife Service and the Colorado Division of Parks and Wildlife (per Rule



- 2.04.11(4)). If it is not based on current lists, please check the current lists and update the PAP accordingly.
4. Vol II, Map 09 – The map legend (key) appears to be missing the symbols for the monitoring locations under Gob Pile #3. Please explain this or update the map. Also, it is recommended that BRL check that all symbols used on the map are included in the legend.
 5. Vol III, Exhibit 8 – Pages 11 and 12 appear to have incorrect dates in the footer, and page 31 does not have “TR-122” in the footer. These pages should be revised.
 6. Vol XI – Within the figure on page 4b, the typical section of the underdrain shows filter fabric above the rock and perforated pipe. Please clarify if this is accurate. Perhaps the fabric should be shown encircling the rock and pipe. If necessary, revise this figure.
 7. Vol XI – Please clarify if Appendix A includes the additional coverfill material that BRL salvaged in 2020. If not, the table should be revised.

Stipulations

8. Please clarify the status of the wells discussed in Stipulation 43, 2015-1B and 2015-1SS. The stipulation states that these wells will be drilled in 2015. If they were never drilled or if other changes to the stipulation should be made, this stipulation will need to be updated. The process for this update will be determined by discussion between BRL and the Division.

Attached to this letter is a summary from an update of the Reclamation Cost Estimate for the Bowie No. 2 Mine. Please let me know if you would like to review the entire estimate. The updated liability is \$11,798,961. The active corporate surety for this site is \$10,971,057.58, 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 or 720.601.2276.

Sincerely,



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

Enclosure: CIRCES Cost Summary

COST SUMMARY WORK

Task description: Cost Summary for RN-05

Site: Bowie No. 2 Mine

Permit Action: RN5

Permit/Job#: C1996083

PROJECT IDENTIFICATION

Task #: 000

State: Colorado

Abbreviation: None

Date: 11/23/2021

County: Delta

Filename: C083-000

User: RDZ

Agency or organization name: DRMS

TASK LIST (DIRECT COSTS)

Task	Description	Form Used	Fleet Size	Task Hours	Cost
001	Pull back and Haul Portal Bench Fill Material to Cut Slope	TRUCK1	1	609.56	\$520,741
002	Regrade D-Portal Bench	DOZER	4	158.03	\$238,849
005	Rip and Regrade Material Storage Area at Gob Pile	DOZER	4	1.73	\$2,616
006	Pull Back Material @ Old Truck Loadout Material Storage Area	EXCAVATE	2	21.27	\$15,283
007	Regrade Old Truck Loadout Material Storage Area	DOZER	4	8.21	\$12,407
008	Pull Back Material at Truck Loadout/Coal Stockpile	EXCAVATE	2	147.57	\$106,027
009	Regrade New Truck Loadout and Coal Stockpile	DOZER	4	32.38	\$48,940
010	Pull Material Back onto Train L/O Facil. and Railbed Benches	EXCAVATE	2	431.74	\$310,194
011	Regrade Train Loadout Facilities and Railbed Benches	DOZER	4	171.56	\$259,289
012	Backfill and Regrade Train L/O Overland Conveyor Corridor	DOZER	4	5.62	\$8,486
013	Haul Fill from Upper Mat'l Strge Area to B-Seam Portal Bench	SCRAPER1	1	60.63	\$47,237
014	Haul Fill fr Adj. Mat'l Storage Area to B-Seam Portal Bench	TRUCK1	1	89.33	\$65,814
015	Backfill and Regrade B-Seam Portal Bench	DOZER	4	38.70	\$64,521
019	Regrade Drill Pads from MRs and TRs	DOZER	4	8.01	\$12,108
020	Regrade Material Storage Area from TR-29	DOZER	4	0.48	\$725
021	Backfill and Regrade New Prep Plant Bench	DOZER	4	36.99	\$55,910
022	Replace Fill from Material Storage Area to Water Tank Bench	SCRAPER1	1	1.51	\$1,177
023	Regrade Borrow Area	DOZER	4	19.14	\$28,933
025	Regrade Upper Parking Lot Expansion Area	EXCAVATE	1	3.65	\$1,314
027	Haul Rock to Vent Shafts for Disposal	TRUCK1	1	18.81	\$7,233
036	Spread Uncompacted Refuse on Gob Pile #2	DOZER	4	89.54	\$135,325
037	Spread Uncompacted Refuse at Gob Pile #3	DOZER	4	100.73	\$152,241
038	Compact Material Hauled to Gob Pile #1	COMPACT	1	11.85	\$3,911
039	Compact Refuse on Gob Pile #2	COMPACT	1	135.94	\$44,861
040	Haul refuse out of Gob Pile #2/#3 drying areas for placement	TRUCK1	1	909.13	\$344,705
041	Compact Refuse at Gob Pile #3	COMPACT	1	147.84	\$48,787
042	Haul Topsoil from Stockpile Area to Gob Pile #1	SCRAPER1	1	2.18	\$1,702
043	Place 3.5' of Coverfill on Gob Pile #1	SCRAPER1	1	15.80	\$12,312
044	Place Coverfill from Stockpiles on Gob Pile #2	SCRAPER1	1	173.74	\$135,358

045	Haul Cover Material from Gob Pile #3 to Gob Pile #2	TRUCK1	1	235.64	\$90,596
045A	Distribute Gob Pile #2 cover hauled by T/L	DOZER	1	375.26	\$141,791
045B	Haul Cover Material from Borrow Area #1 to Gob Pile #2	TRUCK1	1	50.03	\$9,156
045C	Haul Cover Material from Borrow Area #2 to Gob Pile #2	TRUCK1	1	228.88	\$41,887
045D	Haul Cover Material from Borrow Area #3 to Gob Pile #2	TRUCK1	1	41.55	\$7,604
045E	Haul Cover Material from B Portal Storage to Gob Pile #2	TRUCK1	1	108.83	\$41,841
046	Place 2.5' of Coverfill on Gob Pile #3, from stockpile	SCRAPER1	1	196.56	\$153,130
047	Push temp coverfill mat. to face of Gob pile #3	DOZER	1	16.77	\$5,179
050	Compact Backfilled D-Portal Bench, Roads, & Utility Corridor	COMPACT	1	511.43	\$168,767
051	Compact Backfilled Material at Truck Loadout/Coal Stockpile	COMPACT	1	56.10	\$18,515
052	Compact Backfilled Train Loadout	COMPACT	1	191.23	\$63,104
053	Compact B-Seam Portal Bench	COMPACT	1	113.99	\$37,618
060	Rip Utility Bench	RIPPER	4	0.30	\$516
061	Rip D-Portal Bench	RIPPER	4	3.71	\$6,192
062	Rip Truck Loadout/Coal Stockpile Area	RIPPER	4	2.06	\$3,440
063	Rip Regraded Mine Area Prior to Topsoil Replacement	RIPPER	4	59.09	\$98,515
064	Rip Train Loadout Facilities and Railbed Benches	RIPPER	4	7.69	\$12,824
065	Rip B-Seam Portal Bench	RIPPER	4	3.71	\$6,192
066	Rip Rock Laydown Pad Topsoil	RIPPER	1	0.43	\$180
070	Rip Haul Roads (Portion Being Reclaimed) & Old Truck Loadout	RIPPER	4	116.47	\$195,928
071	Remove Haul Road Subbase and Place on Gob Pile #1	SCRAPER1	1	30.02	\$23,385
072	Rip Truck Loadout Road	RIPPER	4	2.14	\$3,610
073	Haul Truck Loadout Subbase to Gob Pile #1	SCRAPER1	1	12.75	\$9,930
074	Rip Upper Haul Road Asphalt Prior to Road Narrowing	RIPPER	4	2.95	\$4,964
075	Pull Back/Haul Fill Mat'l from Upper Haul Rd Narrowing	TRUCK1	1	141.47	\$120,858
076	Regrade Narrowed Section of Haul Road	DOZER	4	26.11	\$39,461
077	Rip Gob Pile #1 Road	RIPPER	4	2.35	\$3,969
078	Regrade Gob Pile #1 Road	DOZER	4	5.17	\$8,612
079	Rip Access Road	RIPPER	4	0.73	\$1,240
080	Haul Access Road Surface to Gob Pile #1	SCRAPER1	1	4.86	\$3,785
081	Regrade Access Road	DOZER	4	1.79	\$2,711
083	Backfill and Regrade Haul Road to Gob Pile #2	DOZER	4	0.44	\$730
084	Rip Lower Haul Road	RIPPER	4	0.95	\$1,591
085	Regrade Lower Haul Road	DOZER	4	36.46	\$60,775
086	Regrade Light Use Roads from MRs and TRs	DOZER	4	60.96	\$101,631
090	Finish Grade Disturbed Mine Area	GRADER	1	129.92	\$23,423
091	Finish Grade Train Loadout	GRADER	1	16.91	\$3,049
092	Finish Grade B-Seam Portal Bench	GRADER	1	6.91	\$1,247
093	Finish Grade Gob Piles #1, #2, #3, and #4	GRADER	1	50.64	\$9,131
095	Backfill and Regrade Pond B	DOZER	1	7.63	\$3,178
096	Backfill and Regrade Pond C	DOZER	1	11.61	\$4,680
097	Backfill and Regrade Gob Pile Pond D	DOZER	1	8.18	\$3,298

098	Backfill and Regrade Pond F	DOZER	1	10.87	\$4,381
099	Backfill and Regrade Pond J	DOZER	1	24.64	\$9,933
100	Backfill and Regrade Pond K	DOZER	1	1.52	\$614
101	Excavate for Post-mining Channel at B-Seam Portals	EXCAVATE	2	0.63	\$453
102	Install Riprap, Gravel, and Geotextile in B-Seam Channel	POSTMININ G	1	43.66	\$7,361
106ag	Plug and seal AW-15	BOREHOLE	1	6.00	\$1,452
106ah	Plug and seal AW16	BOREHOLE	1	6.00	\$1,443
106ai	Plug and seal AW-17	BOREHOLE	1	6.00	\$1,432
106aj	Plug and seal BD-101	BOREHOLE	1	4.00	\$939
106ak	Plug and seal BD-103	BOREHOLE	1	6.00	\$1,401
106al	Plug and seal BD-105	BOREHOLE	1	7.00	\$1,644
106am	Plug and seal BD-105A	BOREHOLE	1	6.00	\$1,395
106an	Plug and seal BD-102	BOREHOLE	1	6.00	\$1,392
106ao	Plug and seal BL-101A	BOREHOLE	1	6.00	\$1,392
106ap	Plug and seal BL-102	BOREHOLE	1	6.00	\$1,394
106aq	Plug and seal BL-102A	BOREHOLE	1	6.00	\$1,392
106bb	Plug and seal GVB-6A	BOREHOLE	1	11.00	\$6,342
106cn	Plug and seal MR133 Utility Hole #1	BOREHOLE	1	10.00	\$7,193
106co	Plug and seal MR133 Utility Hole #2	BOREHOLE	1	10.00	\$7,193
106cp	Plug and seal MR133 Utility Hole #3	BOREHOLE	1	10.00	\$7,193
106cq	Plug and seal MR133 Utility Hole #4	BOREHOLE	1	10.00	\$7,193
106cy	Plug and seal GVB-D-3A (aka GVB-D3-A)	BOREHOLE	1	12.00	\$5,477
106db	Plug and seal GVB-D-7A (aka GVB-D7-A)	BOREHOLE	1	10.00	\$3,638
106dd	Plug and seal GVB-D-5A	BOREHOLE	1	9.00	\$3,043
106do	Plug and seal GVB-D-6A (aka GVB-D6-A)	BOREHOLE	1	10.00	\$3,627
106dp	Plug and seal GVB-D-6B (aka GVB-D6-B)	BOREHOLE	1	6.00	\$5,299
106dq	Plug and seal GVB-D-7B (aka GVB-D7-B)	BOREHOLE	1	11.00	\$4,573
106du	Plug and seal GVB-D-8C (aka GVB-D8-C)	BOREHOLE	1	12.00	\$5,578
106ed	Plug and seal P-TC-03-01 (aka TC-03-01)	BOREHOLE	1	10.00	\$4,266
106ee	Plug and seal P-TC-03-02 (aka TC-03-02)	BOREHOLE	1	10.00	\$4,266
106gb	Plug and seal GVB-17C (aka GVB-B17C)	BOREHOLE	1	12.00	\$11,631
106gc	Plug and seal GVB-17D (aka GVB-B17D)	BOREHOLE	1	12.00	\$13,381
106gd	Plug and seal GVB-17E (aka GVB-B17E)	BOREHOLE	1	12.00	\$15,975
106gi	Plug and seal GVB-17F (aka GVB-B17F)	BOREHOLE	1	12.00	\$16,299
106gn	Plug and seal AW-1	BOREHOLE	1	7.00	\$1,784
106go	Plug and seal AW-2	BOREHOLE	1	6.00	\$1,471
106gp	Plug and seal AW-3	BOREHOLE	1	7.00	\$1,828
106gq	Plug and seal AW-4	BOREHOLE	1	6.00	\$1,471
106gr	Plug and seal AW-5	BOREHOLE	1	6.00	\$1,531
106gs	Plug and seal AW-6	BOREHOLE	1	7.00	\$1,772
106gt	Plug and seal AW-7	BOREHOLE	1	8.00	\$1,940
106gu	Plug and seal AW-8	BOREHOLE	1	6.00	\$1,416
106gv	Plug and seal AW-9	BOREHOLE	1	6.00	\$1,427
106gw	Plug and seal AW-11	BOREHOLE	1	6.00	\$1,411
106gx	Plug and seal AW-12	BOREHOLE	1	6.00	\$1,403
106gy	Plug and seal AW-13	BOREHOLE	1	6.00	\$1,411
106gz	Plug and seal AW-14	BOREHOLE	1	6.00	\$1,392
106hd	Plug and seal DH-13	BOREHOLE	1	12.00	\$4,234
106he	Plug and seal DH-15	BOREHOLE	1	8.00	\$2,149
106hf	Plug and seal DH-15	BOREHOLE	1	9.00	\$2,671

106hg	Plug and seal DH-25	BOREHOLE	1	9.00	\$2,579
106hq	Plug and seal DH-34C	BOREHOLE	1	7.00	\$1,824
106hr	Plug and seal DH-38	BOREHOLE	1	10.00	\$2,948
106hs	Plug and seal DH-39	BOREHOLE	1	8.00	\$2,096
106hv	Plug and seal CWI-DH-47	BOREHOLE	1	12.00	\$5,381
106h w	Plug and seal CWI-DH-48	BOREHOLE	1	12.00	\$5,971
106hx	Plug and seal DH-49	BOREHOLE	1	9.00	\$2,531
106if	Plug and seal DH-57B (aka 98-57B)	BOREHOLE	1	12.00	\$4,012
106ii	Plug and seal DH-58B (aka DH-58A)	BOREHOLE	1	12.00	\$4,113
106ij	Plug and seal CWI-DH-60 (aka Mon Well)	BOREHOLE	1	12.00	\$3,119
106ip	Plug and seal DH-67B	BOREHOLE	1	10.00	\$2,690
106iq	Plug and seal DH-67-D	BOREHOLE	1	9.00	\$2,279
106ir	Plug and seal DH-67-Abv	BOREHOLE	1	8.00	\$1,963
106is	Plug and seal DH-67-Blw	BOREHOLE	1	9.00	\$2,260
106it	Plug and seal CWI-DH-69 (aka B-1 Mon Well)	BOREHOLE	1	12.00	\$3,443
106iu	Plug and seal CWI-DH-70 (aka B-1 Mon Well)	BOREHOLE	1	11.00	\$3,527
106iy	Plug and seal 2010-1B	BOREHOLE	1	12.00	\$4,525
106iz	Plug and seal 2010-1SS	BOREHOLE	1	12.00	\$4,407
110	Replace Topsoil from Stockpile A to Portal/Utility Bench	SCRAPER1	1	652.39	\$508,253
111	Replace Topsoil from Stockpile A to Truck Loadout/Coal Stkpl	SCRAPER1	1	45.95	\$35,795
112	Replace Topsoil from Stockpile F to Train Loadout	SCRAPER1	1	39.98	\$31,146
113	Replace Topsoil from Stockpile A to B-Seam Portal Bench	SCRAPER1	1	87.66	\$68,292
115	Replace Topsoil fm Stockpiles C/D to Pond C and Gob Pond D	SCRAPER1	1	13.12	\$10,218
116	Replace topsoil from Stockpile to Pond F	DOZER	1	3.95	\$1,648
117	Replace topsoil from Stockpile F to Pond J	SCRAPER1	1	2.85	\$2,222
118	Replace topsoil from Stockpile F to Pond K	SCRAPER1	1	1.92	\$1,494
119	Replace topsoil fm stockpile to MR/TR Light-Use Roads	DOZER	4	25.96	\$43,274
120	Replace topsoil from stockpiles to MR/TR drill pads	DOZER	4	27.04	\$43,599
121	Replace topsoil from Stockpile A to Prep Plant Bench	SCRAPER1	1	22.41	\$17,459
122	Replace topsoil from stockpile to Material Storage Area	DOZER	4	0.18	\$305
123	Replace topsoil from Stockpile E to Gob Pile #2	SCRAPER1	1	83.69	\$65,203
124	Replace Topsoil from Stockpile D to Gob Pile #4	SCRAPER1	1	7.01	\$5,463
125	Replace topsoil from stockpile to Gob Pile #3	SCRAPER1	1	85.33	\$66,479
126	Replace topsoil from stockpile to Haul Road	DOZER	4	0.17	\$279
127	Replace topsoil from stockpile to Water Tank Bench	SCRAPER1	1	1.71	\$1,333
128	Replace topsoil from Stockpile G to TR35 road/pad	SCRAPER1	1	5.01	\$3,906
129	Replace topsoil from stockpile to Borrow Area	DOZER	4	5.44	\$9,072
130	Replace topsoil fm stockpile to Upper Parking Lot Expansion	DOZER	1	0.46	\$175
140	Seal Portals and Shafts	MINESEAL	1	40.00	\$258,450
150	Drill Seed Mix 3 on Disturbed Area	REVEGE	1	225.02	\$595,968
151	Drill Seed Drill Pads	REVEGE	1	82.97	\$145,953
152	Drill Seed Lt-Use Roads to Drill Pads and Terror Creek	REVEGE	1	62.01	\$109,082

154	Broadcast Seed Mix 3 on Gob Pile #3	REVEGE	1	60.63	\$113,867
155	Drill seed Hubbard Creek Vent Shaft Pad	REVEGE	1	1.20	\$2,111
156	Drill Seed Rock Laydown Area	REVEGE	1	0.50	\$352
157	Weed Control Over 10-Year Liability Period	REVEGE	1	400.00	\$52,559
165	Demolish and Remove all Structures	DEMOLISH	1	160.00	\$1,666,392
170	Proctor Testing of Backfill (5 tests)	SITEMAINT ENANCE	1	0.00	\$702
171	Nuclear Density Testing of Backfill	SITEMAINT ENANCE	1	0.00	\$133,901
172	Water Truck for Moisture Augmentation of Backfill Material	MISCTRUK	1	1,437.02	\$138,716
173	Site Maintenance - Ten Years	SITEMAINT ENANCE	1	292.00	\$255,198
174	Support Equipment for Scraper Hauling	SITEMAINT ENANCE	1	449.16	\$124,405
180	Mobilize/Demobilize Equipment for First Construction Season	MOBILIZE	1	12.00	\$57,969
181	Mobilize/Demobilize Equipment for Second Construction Season	MOBILIZE	1	12.00	\$57,969
182	Mobilize/Demobilize Equipment for Pond Removal	MOBILIZE	1	6.50	\$5,312
183	Mobilize/Demobilize Equipment for Yearly Site Maintenance	MOBILIZE	1	14.00	\$30,637
241	Regrade Terror Creek Light-Use Road	DOZER	1	29.73	\$9,178
242	Replace Topsoil from Stockpile to Terror Creek Lt-Use Road	DOZER	1	22.45	\$6,931
261	Concrete Plug and Backfill Terror Creek Vent Shaft	MINESEAL	1	40.00	\$177,043
301	Reseed Add'l Disturbance from Utility Boreholes at Fan Bench	REVEGE	1	1.00	\$686
302	Regrade Fan Bench - Utility Borehole Mudpit Add'l Dist.	DOZER	1	4.06	\$1,252
352	Re-topsoil Pitkin Mesa Pipeline corridor	DOZER	1	10.60	\$3,273
353	Reseed Pitkin Mesa Pipeline Corridor	REVEGE	1	2.00	\$3,518
369	Seal Well DH-67blw	BOREHOLE	1	12.00	\$6,782
374	Seal CWI-DH-58A	BOREHOLE	1	12.00	\$7,949
379	Regrade Section 5 Road	DOZER	1	12.88	\$3,975
380	Re-topsoil Section 5 Road	DOZER	1	5.46	\$1,687
381	Reseed Section 5 road	REVEGE	1	2.00	\$2,146
390	Remove Culvert C27 (from TR-119)	DEMOLISH	1	0.25	\$302
<u>SUBTOTALS:</u>				11487.34	\$9,374,283

INDIRECT COSTS**OVERHEAD AND PROFIT:**

Liability insurance: 2.02
 Performance bond: 1.05
 Job superintendent: 5,743.67
 Profit: 10.00

Total = \$189,361
 Total = \$98,430
 Total = \$413,717
 Total = \$937,428

TOTAL O & P = \$1,638,935

CONTRACT AMOUNT (direct + O & P) = \$11,013,218

LEGAL - ENGINEERING - PROJECT MANAGEMENT:

Financial warranty processing (legal/related costs):	<u>\$500</u>	Total =	<u>\$500</u>
Engineering work and/or contract/bid preparation:	<u>4.00</u>	Total =	<u>\$440,529</u>
Reclamation management and/or administration:	<u>3.13</u>		<u>\$344,714</u>
CONTINGENCY:	0.00	Total =	<u>\$0</u>
		TOTAL INDIRECT COST =	<u>\$2,424,678</u>
		TOTAL BOND AMOUNT (direct + indirect) =	<u>\$11,798,961</u>