



STATE OF
COLORADO

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

RN8 adequacy

1 message

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

Tue, Dec 21, 2021 at 9:50 AM

To: "Moline, Ben" <ben.moline@molsoncoors.com>

Hello, Ben

I am sending you another adequacy letter for RN-08. Please note that we need to clarify a lot of information regarding officers for Coors Brewing Company, in particular ending dates for several people. Call if you want to discuss that.

Thanks,
Rob

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



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

I am working remotely and can be reached by cell at 720.601.2276.

Mailing Address:

Division of Reclamation, Mining and Safety, Room 215
1001 East 62nd Avenue
Denver, CO 80216

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RN8_DRMS_2nd_Adequacy.pdf

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

1313 Sherman Street, Room 215
Denver, CO 80203

December 21, 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 Second Adequacy Review**

Dear Mr. Moline:

The Division has completed its second review of a permit renewal (RN-08) for the Keenesburg Strip Mine in accordance with Rule 2.08.5. The review included the Coors Energy Company response (dated November 24, 2021) to the Division's preliminary adequacy review, as well as the Permit Application Package (PAP) for this mine. The Division's original adequacy items are listed below, and items in **bold type** require an additional submittal or clarification.

The Division has a general request: for all revised pages to the PAP, please include a date and "RN-08" in the footer. This could be very helpful in the future when a reader is trying to determine the origin of certain text.

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").
 - *No further revision required.*
2. The proposed renewal term is listed as 10 years on page 3. Please update the form and revise this to 5 years.
 - *No further revision required.*
3. Please confirm the acreages on page 3, and insure that there are no discrepancies with recent Annual Reclamation Reports for this permit.
 - **The revised page 3 does not match the revised ARR form from July 28, 2021. For example, the disturbed acreage and affected acreage (same for a surface mine) should both be 443.53 acres (not 442.88 acres). Also, two of the bond release acreages do not match. The value for 60 percent should equal the value for Phase I released on the ARR form, and the value for 85 percent should equal the value for Phase II released on the ARR form.**



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).
 - **This requirement remains in effect.**

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.
 - *No further revision required.*

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.
 - Based on a check of the Applicant/Violator System (administered by the Office of Surface Mining Reclamation and Enforcement) there are many discrepancies that must be clarified regarding Coors Brewing Company. **Please confirm all of the officers on page 6 of your submittal, including roles and starting dates. Also, please confirm that the following people no longer are officers for Coors Brewing Company and provide ends dates if available:**
 - **Samuel Walker – Director, Vice President, and Secretary**
 - **Peter Swinburn - Director, CEO and President**
 - **Mauricio Cardenas – Corporate Officer**
 - **Stewart Glendinning – Chief Financial Officer**
 - **William Waters - Vice President, Controller**
 - **Sherri Heckel Kuhlmann - Vice President, Assistant Secretary**
 - **Julio Ramirez – Vice President, Treasurer**
 - **Robert Borland – Corporate Officer**
 - **Lori Ball – Director.**
 - **Please confirm if there are other entities in your organizational chart (e.g., the owner of Coors Brewing Company) that are incorporated in the United States.**
 - **Please explain why there is redundancy in the submittal. The information on pages 4b and 4c is identical to pages 5 and 6 for this section. The CEC officers and directors are also on page 2. Please revise the pages as appropriate.**
 - b) Regarding Section 2.05.3, it appears that page 103 is missing.
 - *No further revision required.*
 - c) Regarding Section 2.05.4, several pages of text, including the subsection Determining Final Revegetation Success was changed significantly from the currently approved pages. The Division finds that all of these changes are appropriate, and (in many cases) improve the PAP by increasing the clarity of the language.
 - **The Division does have one grammatical recommendation. In the very last sentence**

of the submitted Section 2.05.4, the word “a” should be removed, so that the end of the sentence reads “defined as noxious by the Colorado Department of Agriculture.”

- d) Please check the page numbers for Section 2.05.4(2).
 - **It is not clear to the Division that this item was addressed. Please explain or revise pages as necessary.**

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.
 - *No further revision required.*

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