



STATE OF
COLORADO

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C1980007, West Elk Mine, MR-459, Initial Adequacy Review

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

Fri, Feb 18, 2022 at 12:07 AM

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

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

Attached

Leigh Simmons
Environmental Protection Specialist



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

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Adequacy letter, West Elk, MR-459, 1.pdf

235K



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

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

February 18, 2022

Re: West Elk Mine (Permit No. C-1980-007)
Minor Revision No. 459, (MR-459)
Initial Adequacy Review

Dear Ms. Poulos,

The Colorado Division of Reclamation, Mining and Safety (Division) has completed the initial review of materials submitted by Mountain Coal Company, LLC (MCC) in support of the MR-459 application.

The Division has received correspondence on the application from the BLM which was also sent directly to you and has been addressed.

Please address the following adequacy items:

Rule 2.02 General Requirements

1. The text of section 1.0 is proposed to be revised. On Page 1.0-1 the following is unchanged:

After longwall operations were established in the B Seam in 1992, production increased to over 1.4 million tons per year and is planned to reach 8.2 million tons of clean coal per year.

Coal production in 2021 at the West Elk mine was less than 3.3 million tons (per the production reports submitted to the Division).

Please confirm that the planned 8.2 million tons of annual production is still accurate.

Rule 2.04.3 Site Description and Land Use Information

2. The text of section 2.04.3 is proposed to be revised. On Page 2.04-1 the following is unchanged:



Average annual precipitation ranges from approximately 25 mm (10 inches) along the North Fork of the Gunnison River and the lower portion of Minnesota Creek to as much as 60 mm (24 inches) on the flanks of Mount Gunnison.

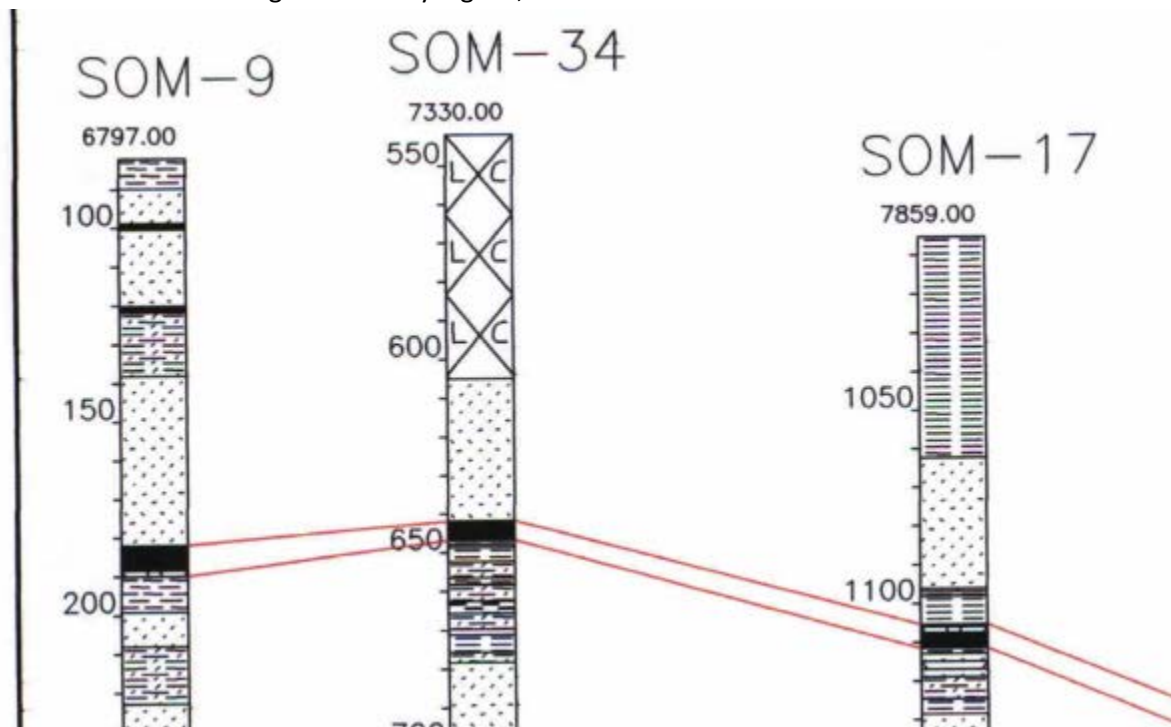
The figures given appear to be in error. Please verify and correct the precipitation values.

3. I consulted Dan Gray of the USFS on the section headed "Gunnison National Forest". An updated draft forest plan was released on 8/13/2021, but is not expected to be finalized until late 2022. In the meantime, the forest plan detailed in the 1991 document (as referenced in the PAP) remains in effect.

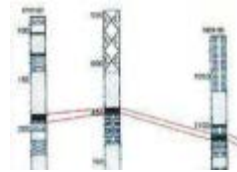
No response is necessary.

Rule 2.04.6 Geology Description

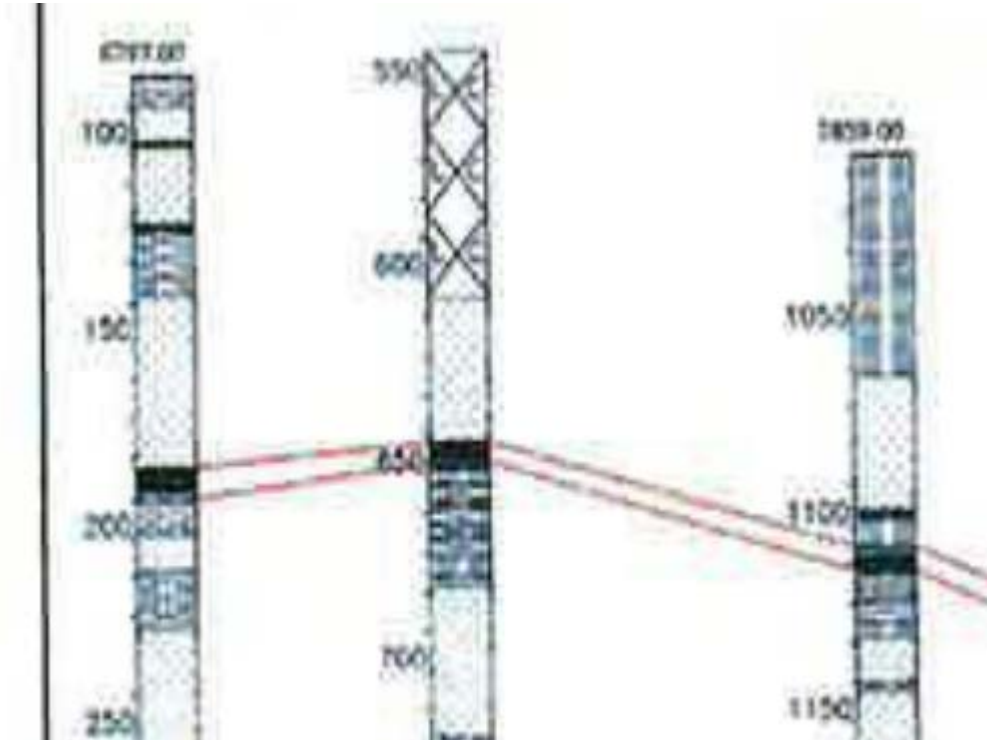
4. Figures 5A-F show stratigraphic cross sections. In order to be legible these figures need to be displayed on a large format page. In the currently approved PAP each figure is indexed separately, and printed on a 36x24 page. When displayed at 100% the information on the figure is clearly legible, as can be seen on the screen shot below:



On the proposed revised pages the same figures are included with the text, on regular 8.5x11.5 pages. When displayed at 100% the information in each figure is too small to be legible, as shown to the right.



If the figures are magnified, the resolution is such that the information is too blurred to be legible, as shown below:



Please remove figures 5A-F from the proposed revised text. These figures are easily found in the laserfiche database and should remain as stand-alone items in the PAP.

5. The currently approved PAP is best viewed when sorted by Section_Exhibit Name. The final document submitted with the MR-459 application proposes to revise the first part of "2.04.6 Geology Description", but the remainder of the document is not included.

Ex is ne	Doc Date	Doc Name Note	Doc Name	From	To	Type & Sequence	Annual Report Year	Report Quarter_Month	Index Doc Type	Section_Exhibit Name
nit File	6/2/2006		Cross Section D-D							2.04.6 Figure 5D
nit File	6/2/2006		Cross Section E-E							2.04.6 Figure 5E
nit File	6/2/2006		Cross Sectio F-F							2.04.6 Figure 5F
nit File	9/4/2018		2.04-12 Thru 2.04-50							2.04.6 Geology Description
nit File	9/4/2018		2.04-51 Thru 2.04-113							2.04.7 Hydrology Description
nit File	6/2/2006		2.04-115 Thru 2.04-125							2.04.8 Climatological Information

It would be preferable, from the Division's perspective, to keep the whole of section 2.04.6 together in a single document. If MCC prefers to break up section 2.04.6 into two or more parts that is their prerogative, however the remainder of the information in 2.04.6 should be revised at the same time to prevent duplication in the PAP.

The proposed decision due date for MR-459 is February 17, 2022. Please request an extension to allow time to respond to this adequacy letter, and for the Division to review your response.

Yours sincerely,



Leigh Simmons
Environmental Protection Specialist