



STATE OF
COLORADO

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

MR-459 Adequacy Response

1 message

Poulos, Nicki <npoulos@archrsc.com>

Tue, Feb 22, 2022 at 10:56 AM

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

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

Leigh,

Please see attached for response to MR-459 Adequacy Letter.

Thank you,

Nicki Poulos

Environmental Engineer

Mountain Coal Co. LLC

West Elk Mine

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Somerset, CO 81434

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4 attachments

MR-459 Final Adequacy Letter Response (1).pdf

91K

2.04.3 Page 1.pdf

73K

2.04.6 Pgs 12-30.pdf

2/22/22, 4:53 PM

State.co.us Executive Branch Mail - MR-459 Adequacy Response

694K

2.04.6 Pgs 31-50.pdf

197K

February 22, 2022

Mr. Leigh D. Simmons
Colorado Division of Reclamation, Mining and Safety
Office of Mined Land Reclamation
1313 Sherman Street, Room 215
Denver, Colorado 80203

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

Dear Mr. Simmons:

Mountain Coal Company, LLC (MCC) submits this response to the Adequacy letter dated February 18, 2022 regarding permit page changes.

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.”

Yes, the maximum annual production is still planned to be 8.2 million tons.

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.”

The text has been revised to, “Average annual precipitation ranges from approximately 24 inches along the North Fork of the Gunnison River and the lower portion of Minnesota Creek to as much as 55 inches on the flanks of Mount Gunnison.” These numbers now correspond with the information in the precipitation section of part 2.04.8 of the current permit text.

“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.

Noted.

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.

Figures 5 A-F have been removed from the permit text.

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.

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 remainder of section 2.04.6 has been updated and is attached.

Please feel free to contact me with any questions or concerns.

Sincerely,



Nicki Poulos
Environmental Engineer