



STATE OF
COLORADO

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

RE: West Elk Mine (Permit No. C-1980-007) Technical Revision No. 150 (TR-150), Revision to Layout of E-Seam Panels (HC# 68249)

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

Thu, Feb 24, 2022 at 5:26 PM

To: "Marques - HC, Matthew" <matthew.marques@state.co.us>

Mr. Marques,

Please find my response attached.

Leigh Simmons
Environmental Protection Specialist



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

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TR150_LetterToSHPO.pdf
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COLORADO
Division of Reclamation,
Mining and Safety
Department of Natural Resources

Matthew Marques
History Colorado
1200 Broadway
Denver, CO 80203

February 24, 2022

Re: West Elk Mine (Permit No. C-1980-007)
Technical Revision No. 150, (TR-150)

Dear Mr. Marques,

This letter is in response to your correspondence of January 13, 2022.

I forwarded a copy of your correspondence to the mine operator, Mountain Coal Company (MCC), and included in my adequacy review letter a request that they respond to your recommendation that a cultural resource inventory be completed for the area to be affected by proposed longwall panels LWE15-17.

MCC's complete response to my adequacy letter can be viewed here:
https://dnrweblink.state.co.us/drms/0/edoc/1352461/2022-02-10_REVISION%20-%20C1980007.pdf?searchid=d0f086ad-b7f8-4e0e-b81a-8af8c7de5718

In the response MCC assert that further cultural resource surveys of the area in question are not warranted. The following reasons are provided as justification:

- No surface disturbance is proposed for longwall panels LWE15-17 with TR-150
- MCC does not anticipate any future revisions proposing Mine Ventilation Boreholes (MVBs) for these panels
- Panels LWE15-17 are proposed with TR-150 to replace panel LWE9, which was originally approved with PR-14. A cultural resources study completed with PR-14 included a survey of sites that were approved for MVBs for panel LWE9. These sites constitute an adequate sample of the area proposed to be undermined by LWE15-17. The survey found no cultural or historic resources in the area proposed to be affected by LWE15-17 that were listed or eligible for listing.
- Another cultural resource survey has more recently been completed for the area immediately east of LWE15-17, where MVBs are proposed for B-seam panels with TR-147

The two surveys mentioned above have previously been provided to your office for review.



Figure 1 (below) shows a screenshot from my GIS software of the previously approved panel LWE9 overlain on the proposed LWE15-17 (outlined in red). Although the image is indistinct, it allows a quick comparison of the previously approved layout with the newly proposed panels. The six circles with dark outlines show the previously approved locations for MVB pads on panel LWE9, and were surveyed for cultural and historical resources with PR-14 (the red circle was approved but not surveyed).

I am satisfied that the requirements of Rule 2.04.4 - Cultural and Historic Resource Information have been satisfied for TR-150. No new material has been submitted for your review.

The decision due date for TR-150 is March 11, 2022. If I have not received a reply from you by March 10, 2022, I will assume your concurrence.

Yours sincerely,



Leigh Simmons
Environmental Protection Specialist

CC: Nicki Poulos

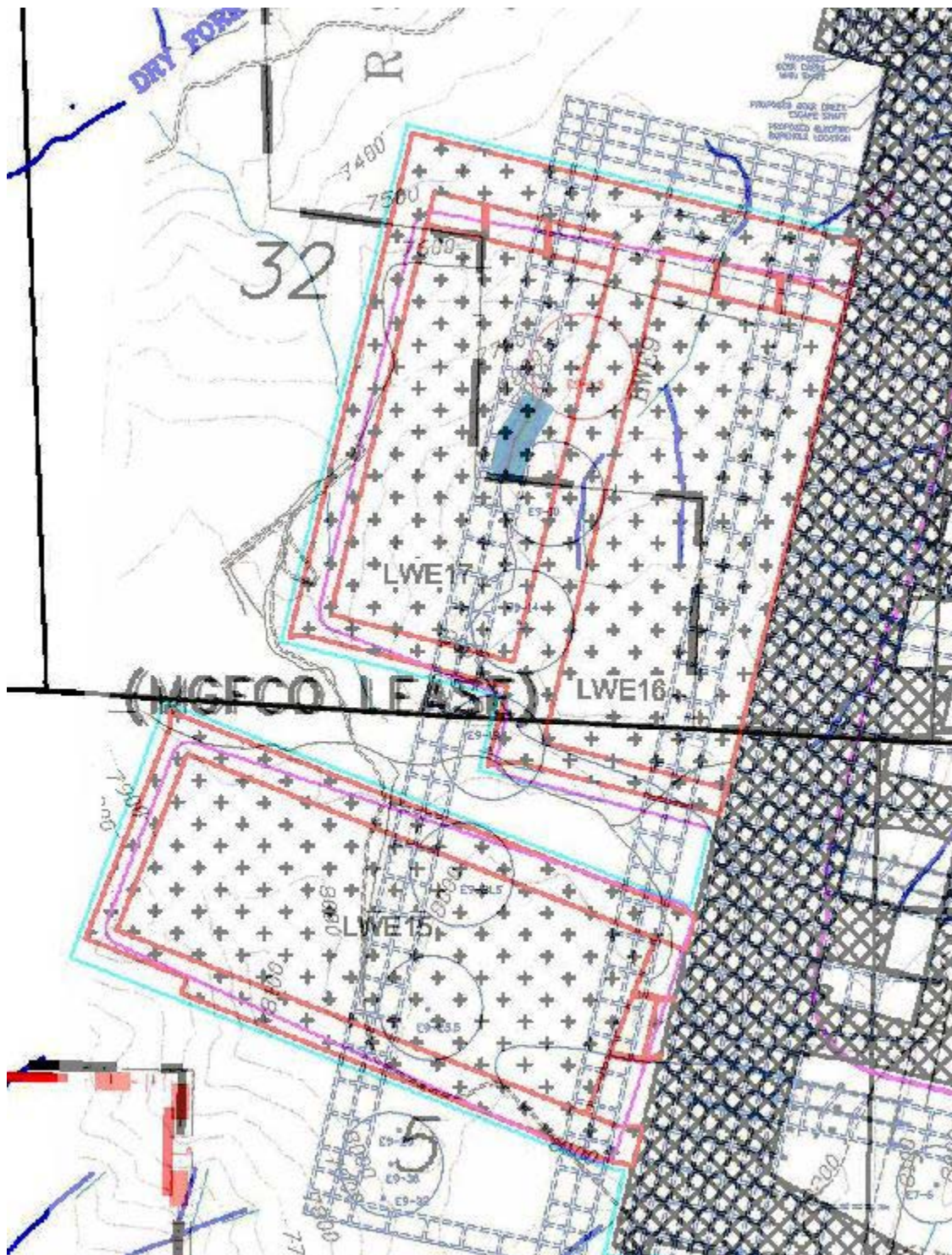


Figure 1