

STATE OF
COLORADO

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

C1980007, West Elk Mine, SL-15, Initial Adequacy Review

Poulos, Nicki <npoulos@archrsc.com>

Tue, Aug 23, 2022 at 11:44 AM

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

Hello Leigh,

Please see attached updated tables and map to include the section of road leading to E7-8&9

Thanks,

Nicki

From: Simmons - DNR, Leigh <leigh.simmons@state.co.us>**Sent:** Friday, July 29, 2022 4:55 PM**To:** Poulos, Nicki <npoulos@archrsc.com>**Subject:** C1980007, West Elk Mine, SL-15, Initial Adequacy Review

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3 attachments**Adequacy Response SL-15.pdf**

168K

**Reclamation map 8-23-22.pdf**

4063K

**Updated Table SL-15 8-23-22.pdf**

101K



Nicki Poulos
Environmental Engineer I
npoulos@archrsc.com
Phone: 970.929.2219

Mountain Coal Company, LLC
A subsidiary of Arch Resources, Inc.
West Elk Mine
5174 Highway 133
Somerset, CO 81434

August 23, 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: Adequacy letter for SL-15 to include section of road to LWE7-8 and LWE7-9

Dear Mr. Simmons:

Mountain Coal Company, LLC (MCC) submits this response to the Adequacy letter dated June 29, 2022. Based off the Phase I inspection conducted on July 14, 2022 it was observed the road leading to E7-8 and 9 was reclaimed and needed to be added to the SL-15 table. MCC would like to include the section of road leading to E7-8 and E7-9 pad. The road is approximately .32 miles long at 14 feet wide making the total acreage for the road .55 acres reclaimed.

The new total number of acres reclaimed for SL-15 is approximately 8.2 acres. Please see attached updated tables and map.

Please contact me with any questions or concerns.

Sincerely,

A handwritten signature in cursive script that reads "Nicki Poulos".

Nicki Poulos
Environmental Engineer

TABLE II - RECLAIMED DRILL SITES AND ROADS

<u>MCC Site Name / MVB Number</u>	<u>Permit Revision</u>	<u>Coordinates</u>	<u>Acres</u>	<u>Year Reclaimed</u>	<u>Plug & Abandon Date</u>	<u>Hole Depth (ft.)</u>
SS1-1	PR15/MR435/ MR457	38° 50' 52.5078", 107° 25' 25.179"	0.54	2021	2021	1,159
SS1-2 & Road	PR15/MR435/ MR457	38° 50' 52.3062", 107° 25' 29.6538"	0.68	2021	2021	1,123
SS1-3 & Road	PR15/MR435/ MR457	38° 50' 54.1998", 107° 25' 35.3346"	0.86	2021	2021	1,143
SS1-4	PR15/MR435/ MR457	38° 50' 55.485", 107° 25' 42.909"	0.52	2021	2021	1,215
SS1-5	PR15/MR435/ MR457	38° 50' 56.7918", 107° 25' 50.145"	0.57	2021	2021	1,141
SS1-7 & Road	PR15/MR435/ MR457	38° 50' 59.985", 107° 26' 8.6598"	0.86	2021	2021	987
SS2-3 & Road	PR15	38° 50' 39.8976", 107° 25' 38.4852"	2.40	2021	N/A	N/A
SS2-5 & Road	PR15	38° 50' 43.1838", 107° 25' 52.5036"	1.17	2021	N/A	N/A
E7-6	PR14/TR140	38° 51' 30.3012", 107° 25' 51.7116"	0.57	2021	2020	975
E7-8 & Road	PR14/TR140	38° 51' 33.84", 107° 26' 15"	1.16	2021	2020	1,300
E7-9 & Road	PR14/TR140	38° 51' 35.3304", 107° 26' 27.2508"	0.82	2021	2020	1,277
E8-6 & Road	PR14/TR140	38° 51' 17.2578", 107° 25' 58.4184"	0.97	2021	2020	723
Road to E7-8&9	PR14/TR141	38° 51' 28.48" N 107° 26' 27.98" W	0.55	2021	N/A	N/A
		Total Acres	8.50			

TABLE I - BONDING

<u>MCC Site Name /</u> <u>MVB Number</u>	<u>Total Number</u> <u>of Acres</u> <u>Reclaimed</u>	<u>RN-7 P&A</u> <u>Cost*</u>	<u>RN-7</u> <u>Regrading</u> <u>Cost*</u>	<u>RN-7 Topsoil</u> <u>Cost*</u>	<u>RN-7 Seed</u> <u>Cost*</u>	<u>Total/ Hole</u> <u>RCE</u>	<u>Bond Release</u> <u>Requested 60%</u>
SS1-1	0.54	\$ 3,219.00	\$ 6,031.00	\$ 2,010.00	\$ 1,664.00	\$ 12,924.00	\$ 7,754.40
SS1-2 & Road	0.68	\$ 3,219.00	\$ 6,031.00	\$ 2,010.00	\$ 1,664.00	\$ 12,924.00	\$ 7,754.40
SS1-3 & Road	0.86	\$ 3,219.00	\$ 6,031.00	\$ 2,010.00	\$ 1,664.00	\$ 12,924.00	\$ 7,754.40
SS1-4	0.52	\$ 3,219.00	\$ 6,031.00	\$ 2,010.00	\$ 1,664.00	\$ 12,924.00	\$ 7,754.40
SS1-5	0.57	\$ 3,219.00	\$ 6,031.00	\$ 2,010.00	\$ 1,664.00	\$ 12,924.00	\$ 7,754.40
SS1-7 & Road	0.86	\$ 3,219.00	\$ 6,031.00	\$ 2,010.00	\$ 1,664.00	\$ 12,924.00	\$ 7,754.40
SS2-3 & Road	2.40	N/A	\$ 6,100.00	\$ 2,033.00	\$ 1,683.00	\$ 9,816.00	\$ 5,889.60
SS2-5 & Road	1.17	N/A	\$ 6,100.00	\$ 2,033.00	\$ 1,683.00	\$ 9,816.00	\$ 5,889.60
E7-6	0.57	\$ 2,219.00	\$ 1,846.00	\$ 615.00	\$ 509.00	\$ 5,189.00	\$ 3,113.40
E7-8 & Road	0.86	\$ 2,219.00	\$ 1,846.00	\$ 615.00	\$ 509.00	\$ 5,189.00	\$ 3,113.40
E7-9 & Road	0.82	\$ 2,219.00	\$ 1,846.00	\$ 615.00	\$ 509.00	\$ 5,189.00	\$ 3,113.40
E8-6 & Road	0.97	\$ 2,323.00	\$ 3,344.00	\$ 975.00	\$ 807.00	\$ 7,449.00	\$ 4,469.40
Road to E7-8&9	0.55	\$ 3,219.00	\$ 6,031.00	\$ 2,010.00	\$ 1,664.00	\$ 12,924.00	\$ 7,754.40
	TOTALS	\$ 31,513.00	\$ 63,299.00	\$ 20,956.00	\$ 17,348.00	\$ 133,116.00	\$ 79,869.60

* See Appendix G for excerpt from RN-7 RCE and table of RN-7 per hole calculations.

** See Table II - Reclaimed Drill Sites and Roads