



U.S. DEPT. OF THE INTERIOR  
OFFICE OF SURFACE MINING  
Mine Site Evaluation  
State Program



1. Permittee/Person <b>COORS ENERGY CO</b>		9. Permit Number <b>C1981028</b>	10. Permit Type <b>PP</b>
2. Address <b>1225 17TH STREET SUITE 3200</b>		11. Field Visit Date <b>8/29/2022</b> <small>mm - dd - yyyy</small>	12. Purpose <b>OBI</b>
3. City <b>DENVER</b>		13. SRA Present <b>Y</b>	
4. State <b>CO</b>		14. Permit Status <b>IN</b>	15. Site Status <b>MC</b>
5. Zip Code <b>80202</b>	6. Phone Number <b></b>	16. Facility Type <b>A</b>	
7. Operator Name, if Different than Permittee <b>COORS ENERGY CO</b>		17. OSM Office # <b>140</b>	18. CCID # <b></b>
8. Mine Name <b>KEENESBURG STRIP</b>		19. Land Code <b>S</b>	
		20. M.S.H.A. ID # <b>05-03515</b>	21. State Abbrev. <b>CO</b>
		22. County/Burrough <b>WELD</b>	
		23. AVS Permittee Entity ID Number <b>56858</b>	24. State Office <b></b>

25. Hours	26. Signature Block	27. Reviewing Official:
<b>5.0</b> a. Permit Review	Signature: <b>Daniel MacKinnon, ID#554</b> Inspector's Name:	Signature: <b>Howard Strand</b> Reviewer's Name:
<b>6.0</b> b. Site Visit Time	Date: <b>10/18/2022</b>	Date: <b>10/18/2022</b>
<b>5.0</b> c. Travel Time		
<b>25.0</b> d. Report Writing		

Permit Type - Item 10 IP = Interim Program PP = Permanent Program NP = No Permit

**Purpose Type Codes - Item 12**

Oxx...Oversight  
Axx...Assistance

RFx...Reclamation Fees  
Fxx...Federal Actions

CCR...Citizen Complaint Referral (non-site visit)  
CC...Citizen Complaint (initial site visit)  
CCF...Assistance

**Joint Inspection - Item 13** A joint inspection is when a state inspector accompanies an OSM inspector at any time during the review of the mine site

**Permit Status - Item 14**

**A** Active: Coal mining activities occurring or permitted but not yet disturbed.  
**IN** Inactive (Permanent Program Permit): Phase II completed or Temporary Cessation of Operations. (Interim Program Permit): Coal mining completed and reclamation activities initiated.  
**BR** Bond Release: Reclamation completed and State Regulatory Authority (RA) has released all of the bond (Phase III Release).

**AB** Abandoned: All surface and underground coal mining activities have ceased and operator has left the site without completing reclamation as defined in 30 CFR 840:11(g).  
**AB1** Bond Forfeiture: Bond forfeiture officially in process or completed and reclamation in progress or not yet commenced.  
**AB2** Partially Reclaimed Forfeiture: Forfeited site where all bonds have been used to reclaim site, but site not reclaimed to Program standards.  
**AB3** Reclaimed Forfeiture: Forfeited site that has been reclaimed to Program standards.  
**NA** Not Applicable: When site is unpermitted.

**Site Status - Item 15**

**ND** No Disturbance: No coal mining and reclamation operations have been started.  
**EX** Coal Exploration: Coal exploration operations have started and where coal mining operations have not begun.  
**AP** Active Coal Producing: Coal surface mining activities are occurring.  
**AN** Active Non-Producing: Active non-producing facility such as tipple or preparation plant.  
**NM** No Mining: The Permit Status is active, site is not in Temporary Cessation, no surface coal mining activity, and site not regraded.

**MC** Mining Complete: No mining activity on site, site regraded and awaiting bond release.  
**TC** Temporary Cessation: The RA has granted cessation of mining pursuant to 30 CFR 816/817:13(b).  
**P1** Phase I Release: At least Phase I bond release granted for entire permitted area. For interim permits, partial bond release.  
**P2** Phase II Release: At least Phase II bond release for the entire permitted area.  
**P3** Phase III Release: Reclamation completed and the RA has released all bond.

**NS** Non-Site Visit: Status of site not determined.  
**FP** Forfeiture Pending: The RA is pursuing actions to revoke the permit, collect the performance bond(s), and/or reclamation of forfeited site is in progress.  
**FR** Forfeited and Reclaimed: Forfeiture reclamation completed.  
**FO** Abandoned Site: Abandoned site that is permitted but there is no bond.  
**WC** Wildcat: Coal mining and reclamation operations have or are taking place and the activity is not covered by the required permits from the RA.

**Facility Type Codes - Item 16**

**A**...Surface  
**B**...Underground  
**C**...Preparation Plant

**D**...Ancillary (Haulroad, Conveyor, and/or Rails)  
**E**...Refuse and/or Impoundment  
**F**...Loading Facility and/or Tipple  
**G**...Stockpiles

**H**...Exploration Permits  
**I**...Notice of Intent to Explore  
**J**...Exempt 16 and 2/3

**K**...Government Financed Construction Exemption  
**L**...Remining site permitted under 30 CFR 785.25

**Small Business Regulatory Enforcement Fairness Act (SBREFA)**

**Your Comments are Important**

The Small Business and Agriculture Regulatory Enforcement Ombudsman and 10 Regional Fairness Boards were established to receive comments from small businesses about Federal agency enforcement actions. The Ombudsman will annually evaluate the enforcement activities and rate each agency's responsiveness to small business. If you are a small business (a business with 500 or fewer employees including those of affiliates) and wish to comment on the enforcement or compliance activities of OSM, call 1-888-REG-FAIR (1-888-734-3247).

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OFFICE OF SURFACE MINING  
Mine Site Evaluation

Permittee/  
Person **COORS ENERGY CO**

Permit  
Number **C1981028**

Field Visit  
Date **8/29/2022**

State Program  
Continuation Page

## 28. Performance Standard Categories

Codes:1=Compliance, 2=Noncompliance, 3=Not Planned, 4=Not Started, 5=Noncompliance Identified Elsewhere, 6=Previously Cited, 7=Permit Defect

### A. Administrative

1. ☐ Mining within Valid Permit
2. ☐ Mining within Bonded Area
3. ☒ Terms & Conditions of Permit
4. ☐ Liability Insurance
5. ☒ Ownership and Control
6. ☐ Temporary Cessation
7. ☐ AML Rec. Fees - Non-Respondent
8. ☐ AML Rec. Fees - Failure to Pay

### B. Hydrologic Balance

1. ☒ Drainage Control
2. ☐ Inspections & Certifications
3. ☐ Siltation Structures
4. ☐ Discharge Structures
5. ☐ Diversions
6. ☐ Effluent Limits
7. ☐ Ground Water Monitoring
8. ☐ Surface Water Monitoring
9. ☐ Drainage - Acid-Toxic Materials
10. ☐ Impoundments
11. ☐ Stream Buffer Zones

### C. Topsoil & Subsoil

1. ☐ Removal
2. ☐ Substitute Materials
3. ☐ Storage and Protection
4. ☐ Redistribution

### D. Backfilling & Grading

1. ☐ Exposed Openings
2. ☐ Contemporaneous Reclamation
3. ☒ Approximate Original Contour
4. ☐ Highwall Elimination
5. ☐ Steep Slopes (includes downslope)
6. ☐ Handling of Acid and Toxic Materials
7. ☒ Stabilization (rills and gullies)

### E. Excess Spoil Disposal

1. ☐ Placement
2. ☐ Drainage Control
3. ☐ Surface Stabilization
4. ☐ Inspections & Certifications

### F. Coal Mine Waste (Refuse Piles/Impoundments)

1. ☐ Drainage Control
2. ☐ Surface Stabilization
3. ☐ Placement
4. ☐ Inspections & Certifications
5. ☐ Impounding Structures

### G. Use of Explosives

1. ☐ Blaster Certification
2. ☐ Distance Prohibitions
3. ☐ Blast Survey/Schedule
4. ☐ Warnings & Records
5. ☐ Control of Adverse Effects

### H. ☐ Subsidence Control Plan

#### I. Roads

1. ☐ Road Construction
2. ☐ Certification
3. ☐ Drainage
4. ☐ Surfacing and Maintenance
5. ☐ Reclamation

#### J. Signs & Markers

1. ☒ Signs
2. ☐ Markers

#### K. ☐ Distance Prohibitions

#### L. Revegetation

1. ☐ Vegetative Cover
2. ☐ Timing

#### M. ☐ Postmining Land Use

#### N. Other

General  
Performance  
Category

## Performance Standard Categories 30 CFR Counterparts

### A. Administrative

1. Valid Permit ..... 773.11
2. Mining within Bonded Area ..... 773.11
3. Terms & Conditions of Permit ..... 773.17
4. Liability Insurance ..... 800.60
5. Ownership and Control ..... 778.13
6. Temporary Cessation ..... §42.11(e) & §16/817.131
7. AML Rec. Fees - Non-Respondent ..... §70.15(b)
8. AML Rec. Fees - Failure to Pay ..... §70.15(a)

### B. Hydrologic Balance (816/817.41-57)

1. Drainage Control ..... 45
2. Inspections & Certifications ..... 49(a)(10)
3. Siltation Structures ..... 46
4. Discharge Structures ..... 47
5. Diversions ..... 43
6. Effluent Limits ..... 42
7. Ground Water Monitoring ..... 41(c)
8. Surface Water Monitoring ..... 41(e)
9. Drainage--Acid - Toxic Materials ..... 41(f)
10. Impoundments ..... 49
11. Stream Buffer Zones ..... 57

### C. Topsoil & Subsoil (816/817.22)

1. Removal ..... 22(a)
2. Substitute Materials ..... 22(c)
3. Storage and Protection ..... 22(c)
4. Redistribution ..... 22(d)

### D. Backfilling & Grading (816/817.95-107)

1. Exposed Openings ..... §16/817.13, 14, 15, & §23.11 & 21
2. Contemporaneous Reclamation ..... 100
3. Approximate Original Contour ..... 102(a)(1)
4. Highwall Elimination ..... 102(a)(2)
5. Steep Slopes (includes downslope) ..... 107
6. Handling of Acid & Toxic Materials ..... 102(c)
7. Stabilization (rills and gullies) ..... 95(b)

### E. Excess Spoil Disposal (816/817.71-74)

1. Placement ..... 71(e)
2. Drainage Control ..... 71(f)
3. Surface Stabilization ..... 71(g)
4. Inspections & Certifications ..... 71(h)

### F. Coal Mine Waste (Refuse Piles/Impoundments) (816/817.81-84)

1. Drainage Control ..... 83(a)
2. Surface Stabilization ..... 83(b)
3. Placement ..... 83(c)
4. Inspections and Certifications ..... 83(d)
5. Impounding Structures ..... 84

### G. Use of Explosives (816/817.61-68)

1. Blaster Certification ..... 61(c)
2. Distance Prohibitions ..... 61(d)
3. Blast Survey/Schedule ..... 62-64
4. Warnings & Records ..... 66 & 68
5. Control of Adverse Effects ..... 67

### H. Subsidence Control Plan (817.121-122)

### I. Roads (816/817.150-151)

1. Road Construction ..... 150(c)
2. Certification ..... 151(a)
3. Drainage ..... 150(b)-151(d)
4. Surfacing and Maintenance ..... 150(e)-151(d)
5. Reclamation ..... 150(f)

### J. Signs & Markers (816/817.11)

1. Signs ..... 11(a),(b),(c)
2. Markers ..... 11(a),(b),(d),(e),(f)

### K. Distance Prohibitions (761.11)

### L. Revegetation (816/817.111-116)

1. Vegetative Cover ..... 111 & 116
2. Timing ..... 113

### M. Postmining Land Use (816/817.133)

#### OSM Action

- 1) Deferred to State Action
- 2) TDN Issued
- 3) NOV Issued
- 4) FTA-CO Issued
- 5) IH-CO Issued
- 6) ID-CO Issued (Imminent Danger to Public)
- 7) Previously cited by RA, abatement pending
- 8) Abated during or before OSM inspection
- 9) Follow-up of Federal Action
- 0) Off-site impact with no violation

#### Off-Site Impacts

- For each type of impact and resource affected, enter "N, D, or J" to describe the degree of off-site impact:
- N - Minor Occurrence
  - D - Moderate Occurrence
  - J - Major Occurrence

## **Denver Field Branch Bond Release Evaluation Report**

Permittee:	Coors Energy Company
Mine:	Keenesburg Mine
Permit No:	C-1981-028
Date of Inspection:	August 29, 2022
Inspection Type:	Partial Phase I bond release
Weather:	Sunny and warm with dry ground conditions
Operator Representative(s):	Ben Moline
State Official(s):	Rob Zuber
BLM Official(s):	N/A
OSMRE Official(s):	Dan MacKinnon (#554) & Daniel Cunningham

### **Background**

This was a partial bond release inspection at the Keenesburg Mine in Weld County, Colorado. Coors Energy Company (CEC) proposes a Phase I bond release on approximately 101.28 acres of reclamation in Areas 35 through 38 and 42 through 45. The Division of Reclamation, Mining and Safety (DRMS) found the application administratively complete on August 04, 2022.

The lands proposed for Phase I bond release lie within the County of Weld, State of Colorado, Section 25, Township 3 North, Range 64 West of the 6<sup>th</sup> PM. Notification of the proposed bond release was posted in the Fort Lupton Press for four consecutive weeks, beginning June 23, 2022, and ending July 14, 2022. The parcels proposed for Phase I bond release were reclaimed between 2019 and 2022. CEC currently posts a surety bond in the amount of \$1,201,563.00 which covers the entire mine site including the above listed areas. With this application, CEC requests the maximum bond release for Phase I, \$574,531.00.

Colorado outlines the requirements for bond release at Rule 3.03.1 of the Regulations for the Colorado Mined Land Reclamation Board for Coal Mining. For Phase I up to 60% of the applicable bond amount shall be released when the permittee successfully completes backfilling, regrading (which may include the replacement of topsoil and seeding), and drainage control in accordance with the approved reclamation plan.

### **Findings**

The team walked each reclamation area to visually confirm the applicable performance standards for Phase I bond release had been met.

#### **Phase I Areas**

- Area 35 (Figure 1): 9.67 Acres
- Area 36 (Figure 2): 25.10 Acres
- Area 37 (Figure 2): 22.55 Acres
- Area 38 (Figure 3): 10.92 Acres
- Area 42 (Figure 4): 11.38 Acres
- Area 43 (Figure 5): 8.30 Acres
- Area 44 (Figure 5): 9.95 Acres

- Area 45 (Figure 6): 3.41 Acres

No field issues were noted that would prevent Phase I bond release on the 101.28 acres (pending further analysis by DRMS). At the time of inspection, all areas were stable and free of major erosional features. Overall, the drainage patterns and topography on site agreed with the permit application. DRMS has identified one minor discrepancy in the topography transect line B - B' for area 38 and will address it in an adequacy review for this bond release application.

The post-mining topography was representative of and blended well with the adjacent, off-permit lands. DRMS and OSMRE assessed the topography of the site using two methods. The first method used GPS and GNSS technology (via an iPhone 8 and the Arrow Gold Eos Positioning Systems). The GPS/GNSS data agreed with the information submitted in the application. The second method manually collected topography data with a rangefinder and slope calculation (estimated by DRMS). The data collected by DRMS is summarized below:

- Area 38 (Figure 1) slopes to the southwest (approximately transect B-B' in the application). A comparison between the field data and the information within the application requires further evaluation by DRMS.
- The portion of Area 42 (Figure 2), due west of the Dugout Pond, slopes to the north at 1.3%. This is close to the slope of 1.1% estimated from the map in the application.
- Area 44 slopes to the northeast at approximately 3.3%. This is close to the slope of 2.6% estimated from the map in the application.
- The Area 35 (Figure 5) slope to the northeast (approximately transect A-A' in the application) of approximately 5% is somewhat above the slope indicated on the cross-section in the application, approximately 3%.

Elevation data was collected through GPS technology; however, the software used indicated a possible variance in elevation of up to 2.3 feet. When the elevation data collected on site was compared with the elevation from the application it showed a variance between 0.2 feet and 6 feet. The data collected appeared to be suspect; staff at OSMRE and DRMS will further analyze the data to find the source of errors (and possible correction). This analysis may inform the forthcoming adequacy review by DRMS.

## **Conclusion**

The reclamation in Areas 35 through 38 and Areas 42 through 45 of the Keenesburg Mine permit totaling 101.28 acres evaluated for bond release comports with the permittee's approved permit and support the rangeland postmining land use (pending further analysis by DRMS). No enforcement actions were taken as a result of this inspection, nor are any pending.



## Figures



Figure 1: Area 35. B-Pit, functioning as designed at the time of inspection.



Figure 2: Area 36 and 37, Long Term Spoil Area, stable and fully functional at the time of inspection.



Figure 3: Area 38. The drainage pattern of this Topsoil Area matched what was submitted in the bond release application; however, the final grade of this area requires further analysis by DRMS to confirm the conditions in the field match the bond release application and the approved permit.



Figure 4: Area 42. Long Term Spoil Area, stable and fully functional at the time of inspection.





Figure 5: Area 43 and 44. Long Term Spoil Area, stable and fully functional at the time of inspection.



Figure 6: Area 45. Stormwater Drainage Area, drainage ditch that runs along the fence line towards Dugout Pond. The ditch was stable and fully functional at the time of the inspection.