



January 5, 2023

Mr. Zach Trujillo
Environmental Protection Specialist
Colorado Division of Reclamation, Mining & Safety
Department of Natural Resources
1313 Sherman Street, Room 215
Denver, CO 80203

RE: Colowyo Coal Company L.P.
Permit No. C-1981-019
Technical Revision No. 157 (TR-157)
Adequacy Response

Dear Mr. Trujillo,

Tri-State Generation and Transmission Association Inc. (Tri-State), is the parent company to Axial Basin Coal Company, which is the general partner to Colowyo Coal Company L.P. (Colowyo). Therefore, Tri-State on behalf of Colowyo is submitting this adequacy response for technical revision 157 (TR-157) to Permit No. C-1981-019.

Tri-State received an adequacy letter from the Division dated January 3, 2023, and has the following response to the Division's concern:

- 1. Currently with the issuance of Technical Revision No. 154, the Colowyo Mine reclamation plan is approved for spoil to remain out of pit permanently near the Collom Pit along with a total of 6,608,464 c.y. of temporary spoil to be transported and used to finish backfilling the remaining portion of the Collom Pit once mining has concluded. However, if the Division were to currently perform the reclamation at the Collom Pit, it is unclear if the 6,608,464 c.y. of temporary spoil would be sufficient to backfill the Collom Pit as it is currently is as well as future approved mining progression. Please provide the Division with additional information showing that the 6,608,464 c.y. of temporary spoil is sufficient to backfill the maximum extent of volume necessary at the Collom Pit or with the amount of temporary spoil that will be needed to backfill the maximum extent of volume necessary at the Collom Pit.*

Response: As discussed with the Division via telephone on January 5, 2023, Exhibit 13C has been updated to reflect that the 6,608,464 cubic yards of material necessary to backfill the Collom Pit is the maximum volume necessary.

If you should have any additional questions or concerns, please feel free to contact Tony Tennyson at (970) 824-1232 at your convenience.



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Sincerely,

DocuSigned by:
Chris Gilbreath
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Chris Gilbreath
Senior Manager,
Remediation and Reclamation

CG:TT:der

cc: Tony Tennyson (via email)

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CHANGE SHEET FOR PERMIT REVISIONS, TECHNICAL REVISION, AND MINOR REVISIONS

Mine Company Name: Colowyo Coal Company L.P.

Permit Number: **C-1981-019**

Date: **January 5, 2023**

Revision Description: **TR-157 Collom Temporaroy Spoil Pile
and Surety Reduction**

Volume Number	Page, Map or other Permit Entry to be REMOVED	Page, Map or other Permit Entry to be ADDED	Description of Change
1			No Change
2A			No Change
2B			No Change
2C			No Change
2D			No Change
2E			No Change
3			No Change
4			No Change
5A			No Change
5B			No Change
6			No Change
7			No Change
8			No Change
9			No Change
10			No Change
12			No Change
13			No Change
14			No Change
15			No Change
16			No Change
17			No Change
18A			No Change
18B			No Change
18C			No Change
18D			No Change
19			No Change

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Volume Number	Page, Map or other Permit Entry to be REMOVED	Page, Map or other Permit Entry to be ADDED	Description of Change
20	Exhibit 13C page 16 (1 page)	Exhibit 13C page 16 (1 page)	Exhbit 13C has been updated in response to comments.
21			No Change
22			No Change

Collom Pit and Temporary Spoil Pile

Tables 13C-23 through 13C- 27 provide the volumes of overburden, topsoil, and reseeding acreage necessary to reclaim the Collom Pit and out of pit stockpile area. There is temporary and permanent out of pit spoil (including the Little Collom Valley Fill) associated with the Collom Pit. Tables 13C-23 and 24 reflect the maximum total amount of overburdened necessary to backfill and regrade the Collom Pit (not including the dragline spoils) to achieve the final approved post mine topography for the Collom Pit, and they do not include the permanent out of pit spoil. Please refer to Map 13C-2 for the final Collom Pit box cut and temporary out of pit stockpile configurations which reflect the locations associated with the volumes presented in Tables 13C-23 and 24.

Table 13C-23 Collom Pit Backfill*

Area	Cut (Cubic Yards)
Collom Pit	6,608,464

*Please see to Map 13C-2

Table 13C-24 Temporary Spoil Pile Removal

Area	Total (Cubic Yards)	Haul Distance (feet)	Average Grade (%)
Temporary Spoil Pile	6,608,464	4,244	3.8

Table 13C-25 Collom Pit and Temporary Spoil Pile Topsoil

Area	Acres Disturbed	Topsoil Replacement Volume (Cubic Yards)	Haul Distance (feet)	Average Grade (%)
Collom Pit & Temporary Spoil Pile	684.4	1,412,134	5,144	3