



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

June 27, 2023

Tony Tennyson  
Colowyo Coal Company L.P.  
5731 State Highway 13  
Meeker, CO 81641

**Re: Colowyo Coal Mine (Permit No. C-1981-019)**  
**Minor Revision No. 247 (MR-247)**  
**Adequacy Review 2**

Dear Mr. Tennyson:

After reviewing MR-247 adequacy response from Colowyo Coal Company L.P. (Colowyo) dated June 27, 2023, the Division has the following comment along with summarization of the previous adequacy item comments and responses:

1. **Division:** *The Division has reviewed the provided information and map showing the addition of Topsoil Pile 9A (previous pile 9A now renamed 9B) however it is unclear from where the topsoil is coming from as there is no additional disturbance associated with the proposed MR-247. Additionally, it is unclear to the Division to the amount of topsoil that will be stored at the proposed Topsoil Pile 9A in order to conduct a reclamation cost estimate. Please provide the Division with additional information regarding the source of the topsoil as well as the total volume amount.*

**Colowyo:** *First, topsoil pile 9A is not replacing topsoil pile 9B as noted by the Division. Topsoil pile 9A will be a new stockpile, and topsoil pile 9B still remains for use in future reclamation activities. Second, topsoil pile 9A will be approximately 645 cubic yards. Finally, the topsoil will be from the very northern portion of reclamation units WP027 and WP028 (please refer to 2022 annual reclamation report map for these locations). Neither of these two reclamation units have been applied for nor approved for Phase II bond released, and the northern portion of these reclamation areas are encroaching on the un-reclaimed areas. Colowyo wants to push up the topsoil to ensure the resource is protected until additional reclamation can occur which will tie-in this area completely.*

**Division:** The Division understands that topsoil pile 9A is not replacing topsoil pile 9B. The intent of the Division's comment was to clarify the change in naming designation of the topsoil pile 9A as shown on the currently approved Map 28 (TR-155) to what is being called topsoil pile 9B on the proposed MR-247 Map 28. See Figure 1 (portion of approved TR-155 Map 28) below for additional clarification.

Based on the provided information, the Division has performed a cost estimate to determine the cost associated with the proposed addition of Topsoil Pile 9A as proposed under MR-247. The total liability amount calculated by this estimate is **\$729.00** (see attached cost estimate). The Division's cost estimate is consistent with previous cost estimates approved by both the Division and Colowyo. The Division respectfully requests a response from Colowyo with any questions regarding the cost estimate or an acceptance of the Division's estimate.



If you have any questions, feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'Zach Trujillo' in a cursive, stylized script.

Zach Trujillo  
Environmental Protection Specialist  
(303) 866-3567 ext. 8164  
Zach.Trujillo@state.co.us

## COST SUMMARY WORK

Task description: Doze Topsoil Pile 9A

Site: Colowyo Coal Mine

Permit Action: MR247

Permit/Job#: C1981019

### PROJECT IDENTIFICATION

Task #: 000

State: Colorado

Abbreviation: None

Date: 6/27/2023

County: Moffat

Filename: C019-000

User: ZTT

Agency or organization name: DRMS

### TASK LIST (DIRECT COSTS)

Task	Description	Form Used	Fleet Size	Task Hours	Cost
001	Regrade Topsoil Pile 9A	DOZER	1	2.32	\$543
<b><u>SUBTOTALS:</u></b>				<b>2.32</b>	<b>\$543</b>

### INDIRECT COSTS

#### OVERHEAD AND PROFIT:

Liability insurance: 2.02

Total = \$11

Performance bond: 1.05

Total = \$6

Job superintendent: 1.16

Total = \$87

Profit: 10.00

Total = \$54

TOTAL O & P = \$158

CONTRACT AMOUNT (direct + O & P) = \$701

#### LEGAL - ENGINEERING - PROJECT MANAGEMENT:

Financial warranty processing (legal/related costs): \$0

Total = \$0

Engineering work and/or contract/bid preparation: 2.00

Total = \$14

Reclamation management and/or administration: 1.91

\$13

CONTINGENCY: 0.00

Total = \$0

TOTAL INDIRECT COST = \$186

**TOTAL BOND AMOUNT (direct + indirect) = \$729**

**BULLDOZER WORK**Task description: **Regrade Topsoil Pile 9A**Site: **Colowyo Coal Mine**Permit Action: **MR247**Permit/Job#: **C1981019****PROJECT IDENTIFICATION**Task #: **001**State: **Colorado**Abbreviation: **None**Date: **6/27/2023**County: **Moffat**Filename: **C81019**User: **ZTT**Agency or organization name: **DRMS****HOURLY EQUIPMENT COST**Basic Machine: **Cat D8T - 8SU**Horsepower: **310**Blade Type: **Semi-Universal**Attachment: **NA**Shift Basis: **1 per day**Data Source: **(CRG)****Cost Breakdown:**

		<u>Utilization %</u>
Ownership Cost/Hour:	\$124.85	NA
Operating Cost/Hour:	\$68.34	70
Ripper own. Cost/Hour:	\$0.00	NA
Ripper op. Cost/Hour:	\$0.00	0
Operator Cost/Hour:	\$41.30	NA

Total unit Cost/Hour: **\$234.49**Total Fleet Cost/Hour: **\$234.49****MATERIAL QUANTITIES**Initial Volume: **645**Swell factor: **1.000**Loose volume: **645 LCY**Source of estimated volume: **Map 28 and ARR**Source of estimated swell factor: **Cat Handbook****HOURLY PRODUCTION**Average push distance: **100 feet**Unadjusted hourly production: **852.6 LCY/hr**Materials consistency description: **Compacted fill or embankment 0.9**Average push gradient: **0 %**Average site altitude: **7,500 feet**Material weight: **2,650 lbs/LCY**Weight description: **Decomposed rock - 25% Rock, 75% Earth****Job Condition Correction Factor**

		<u>Source</u>
Operator Skill:	0.750	(AVG.)
Material consistency:	0.900	(CAT HB))
Dozing method:	1.200	(S-BY-S)
Visibility:	1.000	(AVG.)

Job efficiency:	0.830	(1 SHIFT/DAY)
Spoil pile:	0.800	(FND-RF)
Push gradient:	1.000	(CAT HB)
Altitude:	1.000	(CAT HB)
Material Weight:	0.868	(CAT HB)
Blade type:	1.000	(PAT)

Net correction: 0.4668

Adjusted unit production: 397.99 LCY/hr

Adjusted fleet production: **397.99** LCY/hr

### **JOB TIME AND COST**

Fleet size: 1 Dozer(s)

Unit cost: \$0.589/LCY

Total job time: **2.32** Hours

Total job cost: **\$543**

Figure 1

