



July 12, 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
Minor Revision No. 248
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 to minor revision 248 (MR-248) for Permit No. C-1981-019.

Tri-State revised the Division's adequacy letter dated July 11, 2023, and has the following responses to the Division's concerns:

- 1. With the addition of proposed Topsoil Pile 2A to Table 13C-27 on page 17, there appears to be a text shift which causes a portion of approved Table 13C-30 to shift down to page 18 within Exhibit 13C. Please provide an updated page 18 of Exhibit 13C that accounts for the shift with Table 13C-30.*

Response: The pagination issues on pages 17 and 18 of Exhibit 13C has been corrected.

- 2. The Division has performed a reclamation cost estimate to reclaim the addition of Topsoil Pile 2A located at the Collom Pit. The total value of this estimate is \$283,631.00 (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.*

Response: Tri-State has reviewed the Division's reclamation cost estimate which proposes to increase Colowyo's reclamation liability by \$238,631 and hereby provides concurrence with the Division's estimate.



July 14, 2022
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If you should have any additional questions or concerns, please feel free to contact Tony Tennyson at (970) 824-1232 at your convenience.

Sincerely,

DocuSigned by:
A blue ink signature of Chris Gilbreath, written in a cursive style.
D250C711D0BF450...

Chris Gilbreath
Senior Manager,
Remediation and Reclamation

CG:TT:der

Enclosure

cc: Foster Beckett (BLM-LSFO)
Tony Tennyson (via email)
File: C. F. 1.1.1.230 - G471-11.3(21)d

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

Mine Company Name: Colowyo Coal Company

Date: **July 11, 2023**

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

Revision Description: **MR-248 Topsoil Pile and Cumulative Bond Schedule**

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

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

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Revision Description: **MR-248 Topsoil Pile and
Cumulative Bond Schedule**

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, Pages 17 and 18 (2 pages)	Exhibit 13C, Pages 17 and 18 (2 pages)	Pagination issues has been corrected.
21			No Change
22			No Change

Table 13C-26 Collom Pit and Temporary Spoil Pile Revegetation

Area	Acres to be Reseeded
Collom Pit & Temporary Spoil Pile	907.5

Table 13C-27 Topsoil Stockpile Revegetation

Topsoil Stockpile Number	Acres to be Reseeded
25A	50.9
26B	2.2
26A	24.2
36A	4.1
2A	18.2

Table 13C-28 Collom In-Pit Drill Holes

Drill Hole Number	Plugging Requirements
Please see Exhibit 27, Item 3	

Table 13C-29 Collom Pit Power Distribution

Task	
Remove Power Lines	16,897 Feet
Topsoil Replacement	25,000 Cubic Yards
Reseed Disturbance	10.7 Acres

Table 13C-30 Clean Water Diversions

Clean Water Diversion	Overburden Replacement (cubic yards)	Topsoil Replacement (cubic yards)	Acres to be Reseeded
CWD-1	5,923	4,998	4.3

Table 13C-31 Collom Dragline

Dragline Cut Numbers	Total Regrade Volume (Dozer)	Average Dozer Grade	Average Push Distance (ft.)
Cuts 8-12	1,070,258	9.5%	66