



STATE OF  
COLORADO

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## C1980007, West Elk Mine, Fall 2022 Subsidence Report Review

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

Wed, Aug 2, 2023 at 5:42 PM

To: "Poulos, Nicki" <npoulos@archrsc.com>

Attached

Leigh Simmons  
Environmental Protection Specialist



**COLORADO**  
Division of Reclamation,  
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Department of Natural Resources

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**SubsidenceReportReview\_2022\_Fall.pdf**

186K



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

Nicki Poulos  
Mountain Coal Company, LLC  
5174 Highway 133  
Somerset, CO 81434

August 2, 2023

**Re: West Elk Mine (Permit No. C-1980-007)**  
**Fall 2022 Subsidence Report**  
**Review**

Dear Ms. Poulos,

The Colorado Division of Reclamation, Mining and Safety (Division) has completed the review of the Fall 2022 Subsidence Report.

The report was submitted to the Division in good time, on April 29, 2023. It was prepared by Jonathan M. Kelly, a licensed professional engineer, of Wright Water Engineers, Inc. (WWE).

The report documents field observations made by WWE on October 21, 2022, as well as ongoing monitoring by Mountain Coal Company (MCC) staff.

The report concludes generally that the predictions of subsidence behavior made in the Permit Application (PAP) text and associated Exhibits are borne out by observed subsidence to date, and that field observations made since 1996 continue to validate the conceptual model used to inform the predictions.

Specifically, no impacts to surface water flows as a result of subsidence have been observed. (WWE points out that the hole that opened up under South Prong Creek in 2020 as a result of a roof failure during development mining in the E seam mains that propagated to the surface was not actually "subsidence".)

WWE notes that subsidence effects in the Southern Panels and Sunset Trails areas have been less than those observed in the Box Canyon and Apache Rocks areas, and attributes this to the more subdued topography.

Finally, WWE notes that the healing capacity of the colluvial surface cover in the Southern Panels and Sunset Trails areas is such that subsidence features are nearly imperceptible within a year or two of their formation.



Nicki Poulos  
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The Division appreciates MCC's continued commitment to subsidence monitoring, and WWE's timely submission of a thorough and well documented report.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Leigh Simmons', with a stylized flourish at the end.

Leigh Simmons  
Environmental Protection Specialist