STATE OF COLORADO

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

C1980007, West Elk Mine, September Inspection Report

Simmons - DNR, Leigh <leigh.simmons@state.co.us> Thu, Oct 5, 2023 at 12:48 PM
To: "Wilczek, Jessica" <jwilczek@archrsc.com>

Jessica,

Please find the September inspection report attached. You'll see that there are several areas that were identified as needing maintenance. I've also included a request for more information in bold text in the body of the report.

Apologies for the delay in sending this to you, I've had some family business to deal with over the last few weeks and am just trying to get caught up now.

Please let me know if you have any questions or comments,
Leigh

Leigh Simmons
Environmental Protection Specialist

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

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INSP-REPORTC_C1980007_LDS_09152023045049.pdf
12229K

COLORADO
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PERMIT INFORMATION

Permit Number: C-1980-007 **Mine Name:** West Elk Mine **Operator:** Mountain Coal Company, LLC **Operator Address:** Ms Nicki Poulos 5174 Highway 133 Somerset, CO 81434	**County:** Delta, Gunnison **Operation Type:** Underground **Permit Status:** Active **Ownership:** Private
	Operator Representative Present: None
Operator Representative Signature: (Field Issuance Only)	

INSPECTION INFORMATION

Inspection Start Date: September 12, 2023 **Inspection Start Time:** 10:00 **Inspection End Date:** **Inspection End Time:**	**Inspection Type:** Coal Partial Inspection **Inspection Reason:** Normal I&E Program **Weather:** Clear
Joint Inspection Agency: None	**Joint Inspection Contacts:**
Post Inspection Agency: None	**Post Inspection Contacts:**

Inspector(s):	**Inspector's Signature:**	**Signature Date:**
Leigh Simmons		October 5, 2023

1313 Sherman St. Room 215
Denver, CO 80203
(303) 866-3567

Inspection Topic Summary
NOTE: **Y**=Inspected **N**=Not Inspected **R**=Comments Noted **V**=Violation Issued **NA**=Not Applicable

N - Air Resource Protection
N - Availability of Records
N - Backfill & Grading
N - Excess Spoil and Dev. Waste
N - Explosives
N - Fish & Wildlife
R - Hydrologic Balance
R - Gen. Compliance With Mine Plan
N - Other
R - Processing Waste
N - Roads
N - Reclamation Success
N - Revegetation
N - Subsidence
N - Slides and Other Damage
R - Support Facilities On-site
N - Signs and Markers
N - Support Facilities Not On-site
N - Special Categories Of Mining
N - Topsoil

COMMENTS

This was a partial inspection by Leigh Simmons of the Division of Reclamation, Mining and Safety (Division). Nobody from Mountain Coal Company (MCC) was available to accompany the inspection.
The weather was clear and dry. The mine was active.

HYDROLOGIC BALANCE - Rule 4.05
Drainage Control 4.05.1, 4.05.2, 4.05.3; Siltation Structures 4.05.5, 4.05.6; Discharge Structures 4.05.7, 4.05.10; Diversions 4.05.4; Effluent Limits 4.05.2; Ground Water Monitoring 4.05.13; Surface Water Monitoring 4.05.13; Drainage – Acid and Toxic Materials 4.05.8; Impoundments 4.05.6, 4.05.9; Stream Buffer Zones 4.05.18:

Based on a review of the quarterly reports, the SG-1 and MB-4 ponds were last cleaned in 2021 Q2. No other ponds have been cleaned since then, but a note on the 2023 Q1 and Q2 reports says that the RPE-East pond needs to be cleaned, (the 2023 Q3 report has not yet been submitted). The sediment level in the SG-1 pond was last reported as 5%. Page 2.05-31 of the Permit Application Packet (PAP) states that:

Five stormwater sediment control structures are used as settling ponds for stormwater runoff from the mine site. These ponds have been designed according to CDRMS regulations (see Exhibits 43, 47, 66, and 70)

These ponds have been constructed to contain an estimated three years of sediment storage volume and a runoff storage volume resulting from the 10-year 24-hour rainfall event. Sediment will be excavated, allowing for additional storage, when sediment has reached the maximum storage capacity. Sediment volumes are estimated by a quarterly visual evaluation. The smaller ponds, MB-3 and MB-4, are usually dry during a portion of the year and sediment levels, relative to the primary discharge structure elevations, can be visually determined. The larger ponds usually contain water and visual evaluations are less accurate. These ponds, MB-5E, SG-1 and RPE ponds, will be surveyed at least every three years to determine the actual sediment levels.

The quarterly reports since 2020 Q4 don't refer to any sediment surveys. **Please provide details of the most recent sediment level survey**.

Straw wattles had been effective in controlling runoff on the reclaimed slope west of Shaft #3, however the wattles were in need of repair in places.

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Surface water drainage across the eastern edge of the slope had caused erosion, particularly at outfall 034 (see figures 10 and 11). The slope should be repaired when conditions allow.

The ditch beside the road leading to Shaft #3 (DSLY-14) had breached and debris had spread across the road. Maintenance of the ditch and road is necessary (see figure 13)

The sediment trap at Outfall 032 was in need of maintenance, (see figure 14).

The ditch on the south side of the main Sylvester Gulch facilities area (DSG-1) and the sediment trap at the western end of the ditch were both in need of maintenance, (see figures 15 and 16).

The ditch leading to the RPE ponds, beside the access road (DRPE-2) was in need of maintenance (see figures 18, 19 and 20).

A substantial amount of sediment had accumulated in the south cell of the MB-5E pond, but it was hard to estimate by eye with precision. Based on the sediment level survey, it may be that this cell needs to be cleaned (see figure 23).

GENERAL MINE PLAN COMPLIANCE:

Longwall mining of the LWE15 panel was in progress, between crosscuts 13 and 12 on the headgate. Development of the LWE12 tailgate and start line was complete - the panel had been shortened from what had originally been planned - and development of the headgate was in progress, with crews advancing towards each other from around crosscuts 9 and 17.

PROCESSING WASTE/COAL MINE WASTE PILES – Rule 4.10 and 4.11

Drainage Control; Surface Stabilization; Placement:

As has been the case for several months, coal fines from the wash plant were continuing to accumulate at Stack Tube 5 on the Clean Coal Stockpile pad. Some fines were being blended into the mix to load the trains from this location, but the rate at which fines were being produced continued to exceed the rate at which they could be blended into the coal being loaded onto trains. Excess fines were being transported by truck to the west end of the run-of-mine coal stockpile pad, west of Stack Tube 3, (see figure 22).

At the time of the inspection haul trucks were transporting fines as described above; waste from the temporary stockpile on the RPE to the RPEE; and new waste from the chute coming from the wash plant to the RPEE.

SUPPORT FACILITIES - Rule 4.04:

Contractors with D&S Underground were working to construct a pad for the recently permitted Box Canyon Well (MR-474). The pad footprint had temporarily spread into the Sylvester Gulch Haul/Access Road, covering the roadside ditch which had been diverted through a culvert. After the well has been constructed the pad will be reduced in size and the ditch restored.

Little progress had apparently been made on the reclamation of the SS3 and SS4 pads and roads - these sites were not inspected.

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DOCUMENTS RECEIVED

N/A

OTHER (SPECIFY)

N/A

ENFORCEMENT ACTIONS/COMPLIANCE

No enforcement actions were initiated as a result of this inspection, nor are any pending.

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PHOTOGRAPHS

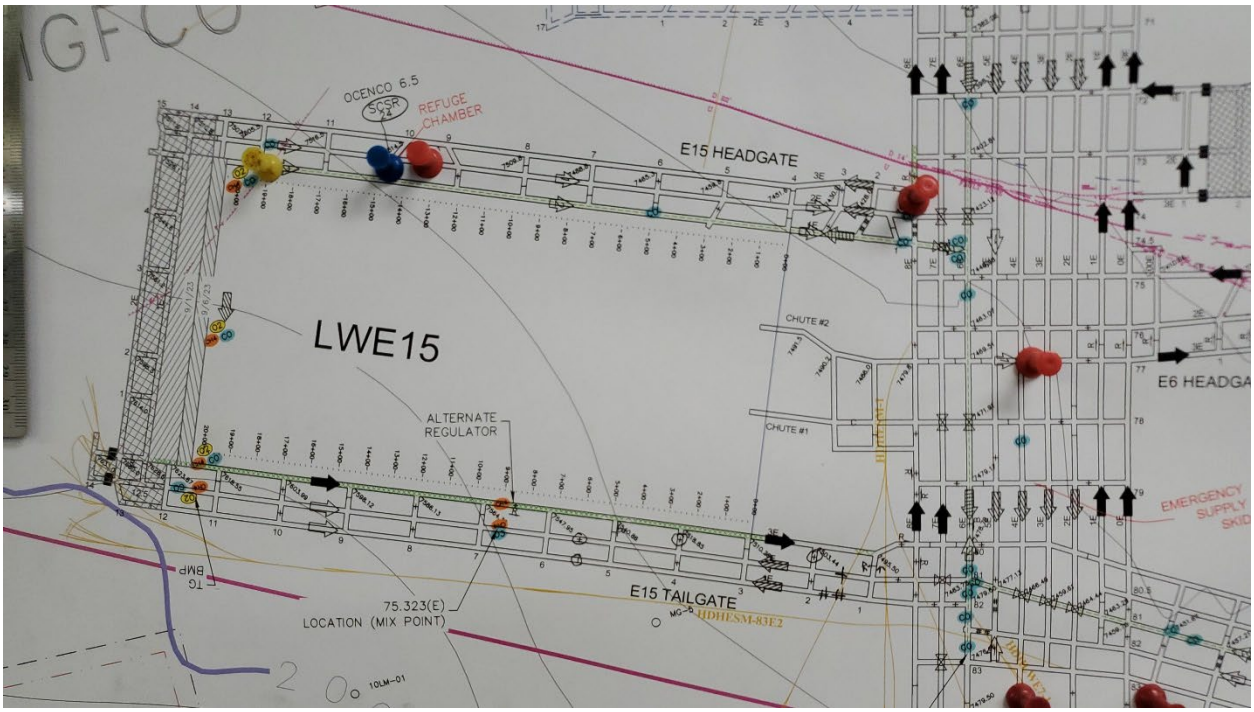

Figure 1: Mine map showing longwall progress in LWE15

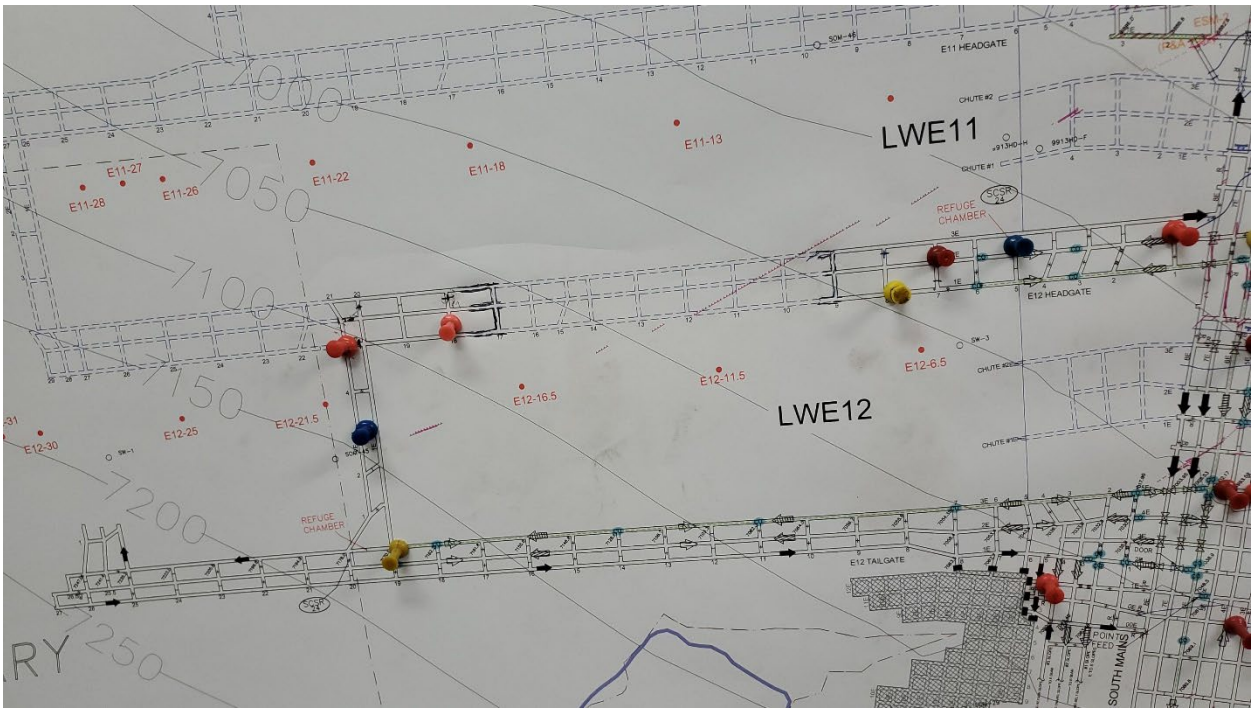

Figure 2: Mine map showing progress on development of LWE12

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Figure 3: Work in progress to construct temporary pad for Box Canyon Well construction; temporary culvert visible in foreground.

Figure 4: Box Canyon Well pad from above

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Figure 5: Material from ditch and road cleaning on subsoil stockpile

Figure 6: SG-1 pond

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Figure 7: SG-1 pond emergency spillway and embankment

Figure 8: SG-1 pond primary spillway discharge control access

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Figure 9: Reclaimed slope west of Shaft #3 pad

Figure 10: Surface water drainage across reclaimed slope west of Shaft #3 pad

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Figure 11: Slope at Outfall 34, needs maintenance

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Figure 12: Outfall 33

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Figure 13: Road to Shaft #3. Road and ditch need maintenance

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Figure 14: Sediment trap below Outfall 32 needs maintenance

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Figure 15: Ditch beside Sylvester Gulch materials storage area needs maintenance

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Figure 16: Sediment trap beside Sylvester Gulch materials storage area needs maintenance

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Figure 17: SG-1 pond from above

Figure 18: RPE pond (east)

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Figure 19: RPE pond (west)

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Figure 20: RPE ponds

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Figure 21: Temporary waste pile on RPE

Figure 22: Fines stored on Run-of-Mine coal stockpile

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Figure 23: MB-5E pond (south)

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Figure 24: MB-5E pond (north)

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