



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

October 18, 2023

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

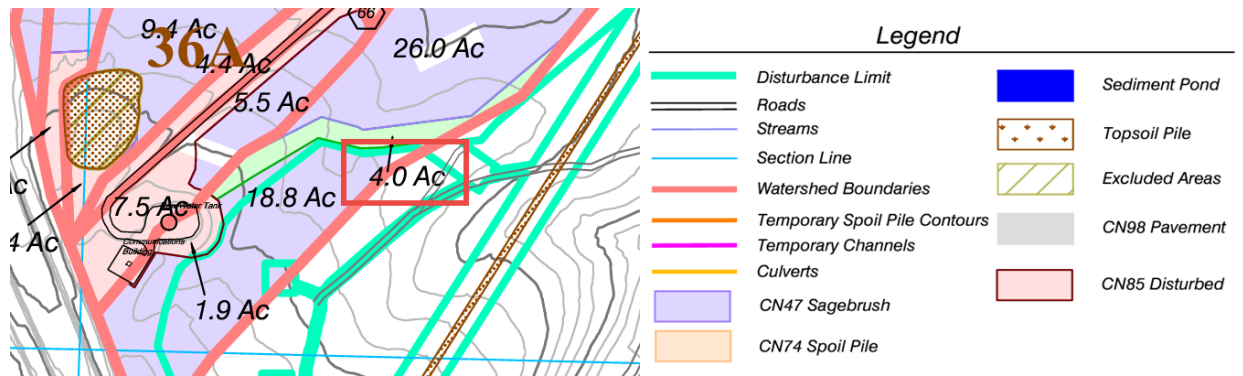
Re: Colowyo Coal Mine (Permit No. C-1981-019)
Technical Revision No. 160 (MR-160)
Adequacy Review

Dear Mr. Tennyson:

After reviewing TR-160 from Colowyo Coal Company L.P. (Colowyo), the Division has the following comments:

1. When reviewing proposed Map 41B, it appears to the Division there is an error in the post-mining drainage profiles. The drainage profiles provided with the above mentioned map appear to correspond to the previously approved profiles prior to the issuance of TR-154. Please provide an updated proposed Map 41B with the correct post-mining drainage profiles or provide updated demonstrations to support the drainage profiles provided under TR-160.
2. When reviewing Proposed Map 13C-1 Sheet 1, channel C-14 is outside the disturbance boundary as shown. Please provide an updated Map 13C-1 Sheet 1 with an adjusted disturbance boundary to include channel C-14.
3. On proposed Figure 7-23B-1 – Section 25 Pond Watersheds During Mining, there is a 4 acre area that is not associated with any designation or curve number when reviewing the map legend. For additional reference, please see the provided figure below this comment. Please provide additional clarification for this area and ensure proper designation on the proposed Figure 7-23B-1 as well as the associated hydrology demonstration in proposed Exhibit 7, Item 23, Part B.

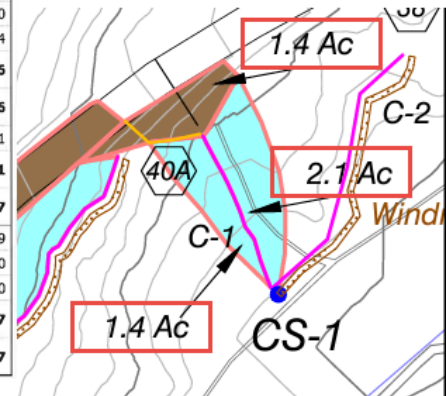




4. When comparing proposed Exhibit 7, Item 25E hydrology demonstration for channels C-1, C-12 and C-13 with proposed Figure 7-25E-1, there appears to be an acreage discrepancy of 0.3 acres. This discrepancy appears to coincide with the immediate contributing acreage associated with the Collom Haul Road channel C-1, specifically the area of CN 85 designation. The total as shown in Figure 7-25E-1 has an acreage of 4.9 while the subwatershed hydrology details in Exhibit 7, Item 25E totals to 4.6 acres. For additional reference, please see the provided figure below this comment. Please provide and updated Exhibit 7, Item 25E hydrology demonstration and/or Figure 7-25E-1 with the correct acreage for Collom Haul Road channel C-1.

Subwatershed Hydrology Detail:

Stru #	SWS #	SWS Area (ac)	Time of Conc (hrs)	Musk K (hrs)	Musk X	Curve Number	UHS	Peak Discharge (cfs)	Runoff Volume (ac-ft)
#12	1	0.700	0.012	0.000	0.000	47.000	S	0.00	0.000
	2	2.900	0.266	0.000	0.000	80.000	F	1.00	0.102
	Σ	3.600						1.00	0.102
#11	Σ	3.600						1.00	0.102
#10	1	12.000	0.187	0.000	0.000	47.000	S	0.00	0.000
	2	2.600	0.024	0.000	0.000	47.000	S	0.00	0.000
	3	2.700	0.309	0.000	0.000	80.000	F	0.88	0.094
	Σ	20.900						1.87	0.196
#9	Σ	20.900						1.87	0.196
#8	1	7.100	0.121	0.000	0.000	89.000	F	6.55	0.511
	Σ	7.100						6.55	0.511
#6	Σ	28.000						7.95	0.707
#3	1	1.100	0.005	0.000	0.000	85.000	F	0.80	0.059
	2	1.400	0.024	0.000	0.000	47.000	S	0.00	0.000
	3	2.100	0.044	0.000	0.000	47.000	S	0.00	0.000
	Σ	32.600						8.75	0.767
#1	Σ	32.600						8.75	0.767



5. On proposed Exhibit 13C, Table 13C-6C, it was observed that Topsoil volume for C-2 was increased from 0 c.y. to 968 c.y. when comparing to the currently approved Table 13C-6C. It was also observed that the revegetation acreage associated with C-2 increased from 0.1 acres to 0.6 acres. Since this volume and acreage differences were not previously captured in the last reclamation cost estimate (RCE) conducted with Renewal No. 8, the Division has included this change in volume and acreage as part of TR-160 RCE. The difference in these increases will be added to the addition of the newly proposed Collom Haul Road channels.
6. It is observed that two new culverts, 71 and 72, were included in proposed Exhibit 13C, Table 13C-8. These culverts have been included in the Division's RCE for TR-160.

7. Under TR-160, Colowyo has proposed an addition of 23.6 acres of disturbance associated with the addition of Collom Haul Road channels and associated sumps. When reviewing proposed Exhibit 13C, the only new disturbance acreage accounted for is associated with channels C-10 through C-15 and this totals 6 acres of the 23.6 acres under TR-160. Please provide the Division with additional information regarding the unaccounted 17.6 acres and provide updates to Exhibit 13C as necessary documenting the additional disturbance under the Collom Cumulative Bond Schedule.
8. At this time, the Division has insufficient information to conduct an accurate reclamation cost estimate associated with the proposed changes associated with TR-160. Once the Division receives additional information regarding some of the above comments, a reclamation cost estimate will be provided under a second adequacy letter.

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

Sincerely,

A handwritten signature in black ink, appearing to read 'Zach Trujillo'.

Zach Trujillo
Environmental Protection Specialist
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Zach.Trujillo@state.co.us