

**Mountain Coal Company, LLC**  
A subsidiary of Arch Resources, Inc.  
West Elk Mine  
5174 Highway 133  
Somerset, CO 81434

December 28, 2023

Colorado Dept. of Health and Environment  
Water Quality Control Division  
4300 Cherry Creek Dr. South  
Denver, CO 80246

**Re: Mountain Coal Company, LLC, West Elk Mine; Permit No. CO0038776 - Semi-Annual Stormwater Inspections**

To Whom it may Concern:

Mountain Coal Company, LLC (MCC) is required by the Colorado Discharge Permit System, Permit Number CO00338776 (the permit): Part I, Section H,1. A. to conduct two comprehensive stormwater inspections for Outfalls 014, 019-043, 046-048, 050-051, 053-054, 056-062, 065-069, 071-104, 107, 117-119, 123-125 between March 21<sup>st</sup> and June 20<sup>th</sup> and again between September 21<sup>st</sup> and December 20<sup>th</sup> of each year. Part I, Section H, 1, E, states that during times of adverse weather conditions that prevent field inspections, permittee must document the basis of failure to inspect. Furthermore, in the same section, the permit states that, "conditions that are dangerous or create inaccessibility for personnel" as reasons for failure to inspect. Below is the reasoning for failure to complete Fall 2023 inspection requirement:

MCC and the surrounding local areas have experienced severe winter weather conditions in 2023 and have continues to battle ongoing snow and rainstorms fall months. This extreme weather has caused Highway 133 to wash out and limit vehicle access to the mine for some time. It also delayed MCC 's contractors in opening and repairing the mountain roads that access the mine ventilation boreholes (MVBs). For these reasons, a portion of the MVBs were not safely accessible for the Semi-Annual Stormwater Inspections. Attempts to reach the inspection areas and photo documentation of weather conditions were made and photo documentation is available upon request.

Please see the attached inspection forms for outfall Inspection information. Feel free to contact me for more information.

Sincerely,



Chase Hiatt  
Mine Engineer Tech

**Storm Water Management System  
 Semi-Annual Inspection Form**

Inspection Team Member(s) Chase Hiatt Date: 5-Dec  
 Weather Conditions: Clear/Cloudy w/in 24hrs of storm event? no  
 Inspectors' Initials: \_\_\_\_\_

Feature	Any Concerns observed?		Maintenance Repairs Needed?		Details of any Yes answers	Date
<b>Train Load Out (TLO)</b>	Select one		Select one			
Good Housekeeping	YES	NO	YES	NO		
Signs of spill/leaks	YES	NO	YES	NO		
Condition of berms	YES	NO	YES	NO		
Sed. Trap/ erosion Control	YES	NO	YES	NO		
Chemical Storage Areas	YES	NO	YES	NO		
<b>Main Mine Area</b>						
Good Housekeeping	YES	NO	YES	NO		
Silo area/signs of erosion	YES	NO	YES	NO		
Coal Stockpile area/ Signs of erosion	YES	NO	YES	NO		
GOB pile/ signs of erosion	YES	NO	YES	NO		
RPE Area	YES	NO	YES	NO		
Storage Benches	YES	NO	YES	NO		
Condition of berms	YES	NO	YES	NO		
Other:	YES	NO	YES	NO		
<b>Buried Utilities</b>						
Good Housekeeping	YES	NO	YES	NO		
Signs of Erosion	YES	NO	YES	NO		
Vegetative Cover	YES	NO	YES	NO		
Mine Water Management	YES	NO	YES	NO		
Equipment Storage Area	YES	NO	YES	NO		
<b>Shaft Exhaust Fan (Sly Gulch)</b>						
Good Housekeeping	YES	NO	YES	NO		
Signs of Erosion	YES	NO	YES	NO		
Vegetative Cover	YES	NO	YES	NO		
Other:	YES	NO	YES	NO		
<b>Fuel and Lube Bay</b>						
Good Housekeeping	YES	NO	YES	NO		
Signs of spill/ leaks	YES	NO	YES	NO		
Oil/ Water separator	YES	NO	YES	NO		
<b>Mobile Refuelers</b>						
Signs of spills/ leaks	YES	NO	YES	NO		
Fuel Storage area	YES	NO	YES	NO		
Other:	YES	NO	YES	NO		
<b>Waste Storage Area</b>						
Good Housekeeping	YES	NO	YES	NO		
Signs of Spills/ Leaks	YES	NO	YES	NO		
Fuel Storage Area	YES	NO	YES	NO		
Other:	YES	NO	YES	NO		

**Storm Water Management System  
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Feature	Any Concerns observed?		Maintenance Repairs Needed?		Details of any Yes answers	Date
<b>Auxiliary Generator Station</b>						
Good Housekeeping	YES	NO	YES	NO		
Fuel Storage Area	YES	NO	YES	NO		
Other:	YES	NO	YES	NO		
<b>Surface Shop</b>						
Good Housekeeping	YES	NO	YES	NO		
Used Oil Storage Area	YES	NO	YES	NO		
Signs of Spills/ Leaks	YES	NO	YES	NO		
Oils/ Water seperator	YES	NO	YES	NO		
Other:	YES	NO	YES	NO		
<b>Inactive Mining Areas</b>						
<b>Inspect Areas for signs of:</b>						
Erosion	YES	NO	YES	NO		
Poor Vegetation	YES	NO	YES	NO		
Other:	YES	NO	YES	NO		
<b>Undisturbed Land</b>						
<b>Inspect Areas for signs of:</b>						
Erosion	YES	NO	YES	NO		
Stormwater Discharge offsite	YES	NO	YES	NO		
Other:	YES	NO	YES	NO		
<b>MVBs</b>						
<b>Inspect pads for signs of:</b>						
Condensate	YES	NO	YES	NO		
Erosion	YES	NO	YES	NO		
Stormwater Discharge offsite	YES	NO	YES	NO		
Other:	YES	NO	YES	NO		
<b>Records Review</b>						
Spill reports: last 6 months	YES	NO	YES	NO		
Training resords- SPCC/SWMP	YES	NO	YES	NO		
Qtr Inspection Forms (Exhibit 66)	YES	NO	YES	NO		
Semi-Annual SWMP Inspection forms	YES	NO	YES	NO		
Copies of Annual Reports: Submitted	YES	NO	YES	NO		
Emergency Contact Info Posted	YES	NO	YES	NO		
Any changes that initiates SWMP change?	YES	NO	YES	NO		





Storm Water Management System  
Semi-Annual Inspection Form

Outfall 027	CSLY-11	11:32a	YES	NO										
Outfall 028	CSLY-13	11:33a	YES	NO										
Outfall 029	CSLY-14	11:35a	YES	NO										
Outfall 030	CSLY-17	11:38a	YES	NO										
Outfall 031	CSLY-19	11:40a	YES	NO										
Outfall 032	CSLY-21	11:48a	YES	NO										
Outfall 033	CSLY-22	12:00p	YES	NO										
Outfall 034	CSLY-23	12:02p	YES	NO										
Outfall 035	TLO	12:05p	YES	NO										
Outfall 036	E1-11.5	11:05a	YES	NO										
Outfall 037	E2-9	12:28p	YES	NO										
Outfall 038	E3-06	10:20a	YES	NO										
Outfall 039	E4-15	1:13p	YES	NO										
Outfall 040	E4-16	12:20p	YES	NO										
Outfall 041	E4-17	1:01p	YES	NO										
Outfall 042	E4-18	12:50p	YES	NO										
Outfall 043	E5-1, 2, 3	2:01p	YES	NO										
Outfall 046	E5-4	2:02p	YES	NO										
Outfall 047	E5-5	2:03p	YES	NO										
Outfall 048	E5-6, 7	2:04p	YES	NO										
Outfall 050	E5-8	2:05p	YES	NO										
Outfall 051	E5-9, 10	2:06p	YES	NO										
Outfall 053	E5-11	2:07p	YES	NO										
Outfall 054	E5-12,13	2:08p	YES	NO										
Outfall 056	E5-14	2:09p	YES	NO										
Outfall 057	E5-15		YES	NO										
Outfall 058	E5-16		YES	NO										
Outfall 059	E5-17	1:08p	YES	NO										
Outfall 060	E5-18		YES	NO										
Outfall 061	E5-20		YES	NO										
Outfall 062	E6-1, 2, 3	10:15a	YES	NO										
Outfall 065	E6-4	10:16a	YES	NO										
Outfall 066	E6-5	10:17a	YES	NO										
Outfall 067	E6-6	10:18a	YES	NO										

Storm Water Management System  
Semi-Annual Inspection Form

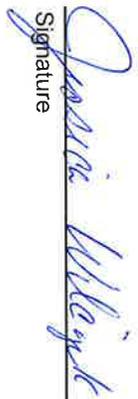
Outfall 068	E6-7	10:19a	YES	NO										
Outfall 069	E6-8, 9	10:20a	YES	NO										
Outfall 071	E6-10	10:21a	YES	NO										
Outfall 072	E6-11		YES	NO										
Outfall 073	E6-12		YES	NO										
Outfall 074	E6-13		YES	NO										
Outfall 075	E6-14		YES	NO										
Outfall 076	E7-1	11:20a	YES	NO										
Outfall 077	E7-2	11:21a	YES	NO										
Outfall 078	E7-3	11:22a	YES	NO										
Outfall 079	E7-4	11:24a	YES	NO										
Outfall 080	E7-5	11:25a	YES	NO										
Outfall 081	E7-6	11:26a	YES	NO										
Outfall 082	E7-7	11:27a	YES	NO										
Outfall 083	E7-8		YES	NO										
Outfall 084	E7-9		YES	NO										
Outfall 085	E7-10		YES	NO										
Outfall 086	E7-11		YES	NO										
Outfall 087	E7-12		YES	NO										
Outfall 088	E8-1	8:20a	YES	NO										
Outfall 089	E8-2	8:21a	YES	NO										
Outfall 090	E8-3	8:22a	YES	NO										
Outfall 091	E8-4	8:23a	YES	NO										
Outfall 092	E8-5	8:24a	YES	NO										
Outfall 093	E8-6	8:25a	YES	NO										
Outfall 094	E8-7	8:26a	YES	NO										
Outfall 095	E8-8	8:27a	YES	NO										
Outfall 098	SS1-1	9:30a	YES	NO										
Outfall 099	SS1-2	9:31a	YES	NO										
Outfall 100	SS1-3	9:32a	YES	NO										
Outfall 101	SS1-4	9:33a	YES	NO										
Outfall 102	SS1-5	9:34a	YES	NO										
Outfall 103	SS1-6	9:35a	YES	NO										
Outfall 104	SS1-7	9:36a	YES	NO										

**Storm Water Management System  
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Date Observed	Location	Control Measure	Maintenance Required	Date Complete
Outfall 117	SS3-1&2	YES	NO	NO
Outfall 118	SS3-3	YES	NO	NO
Outfall 123	SS4-1&2	YES	NO	NO
Outfall 124	SS4-3	YES	NO	NO
<b>Control Measures Requiring Maintenance:</b>				
Outfall 057			Weather prohibited inspection for fall 2023	
Outfall 058			Weather prohibited inspection for fall 2023	
Outfall 060			Weather prohibited inspection for fall 2023	
Outfall 061			Weather prohibited inspection for fall 2023	
Outfall 072			Weather prohibited inspection for fall 2023	
Outfall 073			Weather prohibited inspection for fall 2023	
Outfall 074			Weather prohibited inspection for fall 2023	
Outfall 075			Weather prohibited inspection for fall 2023	
Outfall 083			Weather prohibited inspection for fall 2023	
Outfall 084			Weather prohibited inspection for fall 2023	
Outfall 085			Weather prohibited inspection for fall 2023	
Outfall 086			Weather prohibited inspection for fall 2023	
Outfall 087			Weather prohibited inspection for fall 2023	

I certify this report is true, accurate, and complete, to the best of my knowledge and belief.

Signature  Title Eng. Tech Date 12/28/2023

Signature  Title Engineering Manager Date 12/28/2023

Signature \_\_\_\_\_ Title \_\_\_\_\_ Date \_\_\_\_\_