



April 12, 2024

Miranda Kawcak
Twentymile Coal, LLC
29515 Routt County Road No. 27
Oak Creek, CO 80467

**RE: Foidel Creek Mine- File No. C-1982-056, Minor Revision No. 325 (MR325),
Adequacy Review**

Dear Miranda Kawcak:

The Colorado Division of Reclamation, Mining and Safety (Division) has reviewed the above referenced revision. MR325 was found complete on April 11, 2024. Please respond to the following comments or concerns as necessary:

1. The cover letter submitted with MR325 states that a short 200-foot access road will need to be constructed to access the new WC Mains Utility Borehole site from pre-existing access roads. Additionally, a 900-foot access road will need to be constructed to access the possible 6 East Utility borehole site. Please specify by what means existing two track roads will be upgraded and please specify what materials the construction of any new access roads will require. i.e. Will gravel be used to improve access roads / create new roads? Or will all access roads and improved roads remain only as dirt roads?
2. Will the railroad crossing to be installed by Union Pacific also be removed by Union Pacific once final reclamation of the access road to 6 East is completed? Or will this be part of the mine's final reclamation costs?
3. The MR325 cover letter requests that both new borehole sites be certified as small area exemptions (SAE). While the borehole pads meet the size and drainage type requirements for SAE pursuant to Rule 4.05.2(3)(b)(i), the Division requires a technical demonstration that runoff from these areas will not breach effluent standards. A SEDCAD demonstration is the Division's preferred method, as similar demonstrations have been completed previously for other boreholes onsite. However, a RUSLE equation may also be used.

This letter shall not be construed to mean that there are no other technical deficiencies in your application. The Division will review your application to determine whether it is adequate to meet the requirements of the Act after submittal of all required items. The Division's proposed decision date for this revision is currently set for April 21, 2024.

If you have any questions, please contact me at (720) 868-7757 or hunter.ridley@state.co.us.



Sincerely,
Hunter C. Ridley

A handwritten signature in blue ink that reads "Hunter Ridley". The signature is written in a cursive style with a large initial "H" and a stylized "R".

Environmental Protection Specialist
CC: Zach Trujillo, DRMS