



STATE OF
COLORADO

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

C1980007, TR-153, Initial Adequacy Review

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

Fri, Apr 12, 2024 at 11:35 AM

To: "Aire, Michael E." <maire@archrsc.com>

Mike,

The initial adequacy review letter for TR-153 is attached.

Leigh Simmons
Environmental Protection Specialist



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

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TR153_Adequacy_1.pdf

210K



COLORADO

Division of Reclamation,
Mining and Safety

Department of Natural Resources

April 12, 2024

Michael Aire
Mountain Coal Company, LLC
5174 Highway 133
Somerset, CO 81434

**Re: West Elk Mine (Permit No. C-1980-007)
Technical Revision No. 153, (TR-153)
Initial Adequacy Review**

Dear Mr. Aire,

The Colorado Division of Reclamation, Mining and Safety (Division) has completed a review of materials submitted by Mountain Coal Company, LLC (MCC) in support of the TR-153 application. Please respond to the adequacy items below.

Rules 2.05.2 & 2.05.3 Operation Plan

1. The Deer Creek facilities are briefly described on Page 2.05-28. The text refers to Map 53D and Exhibit 77 for more details. The documents submitted with TR-153 will be added to Exhibit 77.

No further action is required.

Rule 2.05.4 Reclamation Plan

2. Reclamation of the Deer Creek facilities is not discussed explicitly in Section 2.05.4 of the PAP (from Page 2.05-50), but details of the reclamation plan are included in Exhibit 77.

Please update Table 41A (Page 2.05-84) to include the Deer Creek facilities. Please add a footnote to the table referring to Exhibit 77 for details of the reclamation plan.

3. The diameter of the pilot hole is larger than a typical borehole, so it is not clear that the pvc plug/backfill with concrete method to plug and abandon, as used with MVBs, will be appropriate.

Please add a page of text to the TR-153 submission, that will be added to Exhibit 77, describing how the 19" pilot hole will be plugged and abandoned. Please also describe the method that will be used to seal the three E-seam entries at final closure.



Rule 2.05.6(3) Protection of hydrological balance

4. The shaft section figure shows that the shaft will be lined with 12" of concrete. Although groundwater is not anticipated, the possibility of encountering a perched zone cannot be ruled out. The lining of the shaft is protective of vertical groundwater migration.

No further action is required.

The decision due date for TR-153 is 6/11/2024.

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

Appendix 1 - Trujillo Review Memo