



6473 County Road 120
Hesperus, CO 81326



970.385.4528 ext. 6540



mihael@summitmining.co



July 11th, 2024

State of Colorado
Division of Reclamation, Mining & Safety
1313 Sherman St., Room 215
Denver, CO 80203

Attn: Environmental Protection Specialist

Re: GCC Energy, LLC, King II Mine
CDRMS Permit # C-1981-035
Stoner Engineering: Quarterly Inspection: Refuse Pile 2nd Quarter 2024

Mr. Wein:

Please find enclosed a copy of Stoner Engineering's Quarterly Inspection report of the King I mine refuse pile/embankment for the 2nd quarter of 2024.

Please contact me at 970.909.4022, or Jordan McCourt at jmccourt@gcc.com if you have any questions or require any additional information.

Sincerely,

Michael Dickson

Stoner Engineering & Surveying

Engineering, Testing & Surveying

Date: July 5, 2024

To: Jordan McCourt
Project Coordinator
GCC Energy, LLC
6473 County Road 120
Hesperus, CO 81326
(970) 385-4528



From: Ryan Griglak, P.E.
Project Manager
Stoner Engineering & Surveying

Re: King Coal I – Quarterly Waste Pile/Embankment Inspection

On June 28, 2024, Ryan Griglak, P.E. visited the GCC Energy, LLC King I Mine site to conduct the quarterly inspection of the coal waste pile/embankment. Mr. Griglak, P.E. has conducted inspections for the placement of earthwork/embankment fill material for numerous commercial, residential and municipal projects in which buildings, roadways and parking facilities were installed over the placed materials.

The south treated water ditch (Reach 10) ditch experienced some erosion issues while the north clear water ditch (Reach 1) experienced some sedimentation as noted in the Water Quality report. The channel sections need to be repaired, re-established or cleaned out as noted to minimize the potential for erosion.

The face of the upper waste embankment pile was found to be in generally good shape (see Pic. 1). There were no signs of instability or sloughing observed on the main waste embankment pile at the time of the inspection.

There appears to have been some placement of additional fill material to the face of the lower waste pile. Fill material appears to have been brought up to roughly three-quarters of the height of the lower waste pile with an equipment access from the west side of the pile (see Pic. 2). Berming along the top of the lower pile, where the equipment access is located, was insufficient at the time of the storm to direct all surface flows to the west side of the lower pile (see Pic.3). A portion of the flows was able to flow down the equipment access to the face of the pile and resulted in erosion to the face of the lower waste pile (see Pic. 4). The erosion took place south of the abandoned bath house located at the base of the lower waste pile. The face of the lower waste pile needs to be replaced and recompact around the eroded location. The equipment access at the top of the lower waste pile needs to be improved to ensure that surface runoff can not bypass the treated water ditch (Reach 10) along the west side of the pile.

The upper waste embankment pile level appears to be unchanged since the previous inspection. The lower waste pile has had additional material installed along the face as well as stockpiled on the top. The grading of the upper waste embankment piles appears to direct surface runoff away from the face of the piles and the required berming is in place. The grading of the lower waste pile generally directs runoff away from the face however, there is a portion near the equipment access for the ongoing fill placement where surface runoff was able to reach the face. The grading near the equipment access needs to be improved to ensure future storm events do not result in runoff reaching the face of the embankment pile.

The face of the upper and lower waste embankments appeared to be in good condition except as noted on the lower pile. There were no signs of instability or sloughing observed on either waste embankment pile at the time of the inspection. The slope of the top of the existing pile is close to that defined in the Waste Bank Design produced by Don May, 1997.

The only structure with any proximity to the embankment material is the old, abandoned bath house which is no longer utilized.

The waste pile has been and continues to be constructed and maintained as specified in the design approved by the Division of Reclamation, Mining & Safety. Potential hazards to life and property are minimal due to the fact that GCC has moved most of their operations to their King II facility.

Please let me know if you have any additional questions or concerns in regards to the issues that are discussed above.

Sincerely,



Ryan M. Griglak, P.E.
Project Manager



Pic. 1 –Face of the main waste embankment pile in good condition.



Pic. 2 – Equipment access, lower waste pile, for fill placement.



Pic. 3 – Erosion from surface runoff at equipment access of lower waste pile.



Pic. 4 – Erosion of face of lower waste pile south of old bath house.