

STATE OF  
COLORADO

Zuber - DNR, Rob &lt;rob.zuber@state.co.us&gt;

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**Keenesburg SL12 adequacy review**

1 message

**Zuber - DNR, Rob** <rob.zuber@state.co.us>

Fri, Jul 19, 2024 at 11:14 AM

To: "Moline, Ben" &lt;ben.moline@molsoncoors.com&gt;

Cc: "Bowles, Brock" &lt;brock.bowles@state.co.us&gt;

Hi, Ben -

As the attached letter says, we have some questions on the methodology for assessing the vegetation data for SL-12. We were not able to duplicate the answers of Habitat Management using the equations in the application (page 8 of the Revegetation Success Demonstration).

I copied Brock Bowles on this email, so if you or Robin Bay have any questions you can ask them of both of us. Brock is more knowledgeable of the details of the methodology.

FYI, Brock and I will both be unavailable next week. The following week, I will not be available until Wednesday and Brock will be playing catch-up, but if you email us with questions, we will get back to you when we can. Of course, you can send me a formal adequacy response in a letter as well (ePermitting is still not available for bond releases, I think).

Thanks,  
Rob

Rob Zuber, P.E.  
Environmental Protection Specialist  
Active Mines Regulatory Program



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

***I am working remotely and can be reached by cell at 720.601.2276.***

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**Keenesburg\_SL12\_DRMS\_Adequacy1.pdf**

186K



July 19, 2024

Ben Moline, PE  
Senior Manager, Water Resources & Environmental Compliance  
Coors Energy Company  
P.O. Box 4030  
Golden, CO 80402

**Re: Keenesburg Strip Mine, Permit C-1981-028,  
Adequacy Review of Bond Release No. 12 (SL-12)**

Dear Mr. Moline:

The Division of Reclamation, Mining and Safety (Division) received the SL-12 application for the Keenesburg Strip Mine on May 14, 2024, from Habitat Management, Inc., representing Coors Energy Company (CEC). The Division reviewed this application in the context of CRS 34-33-125(9)(c) and Rules 3.03.1 and 3.03.2 (Rules and Regulations of the Colorado Mined Land Reclamation Board for Coal Mining).

The following adequacy items must be addressed before the Division can approve this revision application.

**Vegetation Cover Standard:**

1. In the application, the equation used to calculate the Vegetative Cover Standard is “ $-0.0127x^3 + 0.2115x^2 + 2.1772x$ ”, where “x” is equal to the cumulative September-July precipitation. The provided Sept-July Precipitation is 9.8 inches in 2021 and 6.6 inches in 2022. The Vegetative Cover Standard provided in the application is 27.2 for 2021 and 19.9 for 2022. The Division checked the Vegetative Cover Standard by entering the precipitation for those years into the equation, we got a standard of **29.70 for 2021** and **19.93 for 2022**. Since the Division was unable to replicate the 2021 Vegetative Cover Standard, please explain how the standards in the application were achieved. If this is a mistake, please update the Vegetative Cover Standard in the appropriate tables and text in the application.

**Herbaceous Production Standard:**

2. In the application, the equation used to calculate the Herbaceous Production Standard is “ $0.4666x^{2.1405}$ ”, where “x” is equal to the cumulative September-July precipitation. The Herbaceous Production Standard provided in the application is 21.0 for 2021 and 11.0 for 2022. The Division checked the Herbaceous Production Standard by entering the precipitation for those years into the equation, we got a standard of **61.75 for 2021** and **26.50 for 2022**. Since the Division was unable to replicate the Herbaceous Production Standards for 2021 and 2022, please explain how the standards in the application were achieved. If this is a mistake, please update the Herbaceous Cover Standards in the appropriate tables and text in the application.



If you have any questions, please do not hesitate to contact me at [Rob.Zuber@state.co.us](mailto:Rob.Zuber@state.co.us) or 720.601.2276.

Regards,

A handwritten signature in blue ink, appearing to read "Robert D. Zuber".

Robert D. Zuber, P.E.  
Environmental Protection Specialist