



STATE OF  
COLORADO

Reilley - DNR, Robin <robin.reilley@state.co.us>

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## Inspection Complete Trapper 2024 August

1 message

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**Reilley - DNR, Robin** <robin.reilley@state.co.us>

Mon, Aug 26, 2024 at 3:35 PM

To: Graham Roberts <graham.roberts@trappermine.com>, Robin Reilley - DNR <robin.reilley@state.co.us>

Good Afternoon Graham,

Please find the above referenced inspection report for the site.

I'm available to answer any questions or concerns.

Thank you

Robin Reilley, M.S. GISP  
Environmental Protection Specialist II



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

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

**22 August 2024**

PERMIT INFORMATION

Permit Number: C1981010 Mine Name: Trapper Mine Operator: Trapper Mining, Inc. Operator Address:  Mr. Graham Roberts P.O. Box 187 Craig, CO 81626	County: Moffat Operation Type: Surface Permit Status: Active Ownership: Federal
	Operator Representative Present:
This report was issued electronically from the Divisions' Denver Office.	

INSPECTION INFORMATION

Inspection Start Date: <b>22 August 2024</b> Inspection Start Time: 8:45 a.m. Inspection End Date: <b>22 August 2024</b> Inspection End Time: <b>18:30</b> p.m.	Inspection Type: <b>Coal Complete Inspection</b> Inspection Reason: Normal I&E Program Weather: Cloudy
Joint Inspection Agency:	Joint Inspection Contacts:
Post Inspection Agency: None	Post Inspection Contacts:
Inspector(s): Robin A. Reilley, M.S. GISP	Inspector's Signature:  Signature Date: <b>26 August 2024</b>

Number of Partial Inspection this Fiscal Year: 1

Number of Complete Inspections this Fiscal Year: 1

Inspection Topic Summary	
NOTE: Y=Inspected N=Not Inspected R=Comments Noted V=Violation Issued NA=Not Applicable	
Y - Air Resource Protection	R - Roads
R - Availability of Records	R - Reclamation Success
R - Backfill & Grading	R - Revegetation
NA - Excess Spoil and Dev. Waste	R - Subsidence
R - Explosives	R - Slides and Other Damage
R - Fish & Wildlife	R - Support Facilities On-site
R - Hydrologic Balance	R - Signs and Markers
R - Gen. Compliance With Mine Plan	NA - Support Facilities Not On-site
NA - Other	NA - Special Categories Of Mining
NA - Processing Waste	R - Topsoil

### COMMENTS

This was a complete inspection of the Trapper Mine; permit C1981010, operated by Trapper Mining Inc. The inspection was conducted, and the report and photos prepared by me, Robin Reilley of the DRMS. Graham Roberts Trapper Mine representative was present throughout the inspection. No hydrologic or air quality issues were detected at the time of inspection. Skies were partly cloudy, and there was an intermittent breeze with a short afternoon rainstorm. Temperatures ranged between 65 and 80 degrees Fahrenheit.

#### *PERMITTING ACTIONS in PROGRESS:*

*SL 25*

#### *MAINTENANCE ITEMS COMPLETED*

- 1. Repairs have been made to D Pit constructed drainage rills and gullies as well as compromised check dams.*
- 2. Repairs have been made to constructed drainages MF2, MF3 and MF' in Parcels ZA 17, LA18 and LAB19 exhibited gullies.*
- 3. East Pyeatt Pod had been cleaned.*
- 4. Rocks have been stockpiled for spillway repairs in the Buzzard system.*
- 5. Permit boundary markers have been placed along the PR11 expansion area.*
- 6. Middle Flume #1 and #3 Ponds exhibit deltas. Dozer basin above have been cleaned and approximately a third of the deltas have been removed.*

#### *MAINTENANCE ITEMS*

- 7. Flume at West Buzzard Pond #3 is undercut and discharge plunges 4 or so feet into the plunge pool, requiring stabilization and reconstruction. Rock is staged for repairs that will be taking place in later August or early September*
- 8. West Buzzard Pond #4 has rock staged for lining spillway.*
- 9. Far East Buzzard and East Pyeatt #1 ponds require sediment markers.*
- 10. Johnson system has vegetation growing in the ponds and may require dredging. Cleaning is scheduled for late August or early September.*
- 11. Oak system exhibits vegetation in spillway that may impede flow.*
- 12. D pit permanent seed mix and topsoil is scheduled for application in the autumn of 2024.*

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**INSPECTION****GENERAL MINE PLAN COMPLIANCE:**

**J Pit West:** There is a coal pile ready to be hauled and mixed. Highwall miner entrances have been closed. Highwall mining is complete at the west end and this area could be ready for backfilling and grading in spring of 2025. However, backfilling and grading would not occur until soils are dry enough to be worked. Mining to the east area of the pit is scheduled for late this year (2024). Mining should be completed early next year (2025) so reclamation could begin. The Queen Ann dragline was working in J Pit West, and topsoil stripping was occurring at J Pit East at the time of inspection. A blast was set up.

**D Pit:** The temporary seed mixture comprised of triticale showed good germination and cover. Erosional features existing at the apex of the D Pit constructed drainage as well as areas between check dams and along slopes had been repaired.

**N Pit:** Coal extraction is idle as there was a high wall slump about 20 feet wide. The rocks fell onto the bench. However, the highwall minor is stuck and cannot be extracted at this point. Cracks are exhibited in a horseshoe pattern on the slope above the highwall and some horizontal cracking (east west) in the haul road above was observed. N Pit is ready to back fill at west end for access to the next level coal. All the adits in the N Pit are backfilled.

Constructed drainages in parcels ZA 17, LA18 and LAB (SL 24 release), discharging to the Middle Flume system have been repaired.

**L Pit:** The Baby Doe was working in the pit and Molly Brown was under repairs. Coal and overburden were being loaded and hauled. A blast is set up in L Pit.

**SIGNS and MARKERS – Rule 4.02**

- The mine identification sign was in place at the site entrance from the Highway 13. The sign was intact, displaying all required information: mine name, operator name, address, phone number, DRMS permit number and contact information.
- The blasting sign was also situated at the entrance displaying all the required blasting safety information.

**ROADS – Rule 4.03**

*Construction 4.03.1(3) I 4.03.2(3); Drainage 4.03.1(4) I 4.03.2(4); Surfacing and Maintenance 4.03.1(5) and (6) I 4.03.2(5) and (6); Reclamation 4.03.1(7) I 4.03.2(7)*

- Main haul roads were dry and in good repair.
- Haul roads were being watered as needed.
- All access roads were accessible and in adequate repair at the time of inspection.
- Ditches along haul roads and access roads appeared to be functioning adequately.

**HYDROLOGIC BALANCE – Rule 4.05**

*Drainage Control 4.05.1, 4.05.2, 4.05.3; Siltation Structures 4.05.5, 4.05.6; Discharge Structures 4.05.7, 4.05.10; Diversions 4.05.4; Effluent Limits 4.05.2; Ground Water Monitoring 4.05.13; Drainage- Acid and Toxic Materials 4.05.8; Impoundments 4.05.6, 4.05.9; Stream Buffer Zones 4.05.18*

Pond banks were stable and vegetated, spillways, discharge structures; flumes and decant structures, appeared in good repair at the time of inspection. Dam out slopes were vegetated and no seepage was observed through the dams at the time of inspection. The Flume system has suddenly experienced a

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proliferation of aquatic growth comprised of cattails and grasses, covering a significant portion of the pond and its circumference.

Ponds visited include:

- East Buzzard #3 holding turbid water at the time of inspection. The pond was not discharging. Rock is staged for lining the spillway.
- West Buzzard #4 holding a small amount of water. Rock is staged for lining spillway.
- No Name Pond #2 had been dewatered to facilitate dredging. Dredging was completed early in August. Repairs are scheduled for the spillway. Dredging may occur every year or so until Derringer Pit vegetation stabilizes the slopes above. Inflow water from upstream springs is no longer diverted around pond. Discharge is flowing clear to the next pond in the system.
- No Name #3 was discharge through the decant structure. The water appeared clear in the drainage way.
- No Name #4 appeared full at the time of inspection.
- No Name #5 was full and was discharging clear water. Cattails will be removed from outlet this fall.
- Coyote holding water.
- Jeffway photo from above holding a small amount of water.
- Deal Pond #1 holding water and not discharging at the time of inspection. Sumps have been installed in the drainage above the pond as snowmelt in recent years has been significant.
- Deal Pond #2 was dry at the time of inspection.
- East Middle Flume #1. Discharging clearwater, cattails are abundant at the entrance to the spillway and grass is prevalent throughout the pond.
- Middle Flume#3, a portion of the delta has been removed. There is grass growing throughout the pond and a formidable stand of cattails around the perimeter. The pond was not discharging at the time of inspection.
- Middle Flume #1 held water and exhibited some algal growth.

#### *USE of EXPLOSIVES – Rule 4.08*

*General Requirements 4.08.1; Pre blasting survey 4.08.2; Public Notice of Blasting Schedule 4.08.3; Surface Blasting Requirements 4.08.4; Records of Blasting for Surface Coal Mining 4.08.5; Seismographic Measurements 4.08.6d stripping.*

- Blasts were being prepared in L and J Pits.

#### *SLIDES and OTHER DAMAGE- Rule 4.12*

- A crack has existed at top of D Pit. Despite 2023 efforts to mitigate the cracking, the crack remerged in 2024.
- A crack is evident where A Pit ends.
- A highwall slump occurred in N Pit and cracking, possibly associated with the failure was observed in the slopes to the south above the slump and in the road above the highwall to the south.
- The operator will routinely monitor the areas for any changes, specifically additional movement, cracking or slumping.

#### *BACKFILL and GRADING – RULE 4.14*

- Reclamation consists of benched (dragline) and dozer piled overburden in L Pit awaiting grading, what should be an ongoing activity at Trapper Mine.
- The depth of L Pit and track and dozer operations for recent new cuts in L Pit appear to inhibit the traditional contemporaneous reclamation activities generally practiced with Trapper mine's dragline operations.

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- The flat surfaces of the Ash Pit were dry and firm, with no standing water or ruts and appeared to be functioning adequately at the time of inspection.
- Ash was being hauled and dumped at the time of inspection.

#### *REVEGETATION - Rule 4.15*

##### *General Requirements 4.15.1; Use of Species 4.15.2, Grazing 4.15.5*

- Revegetated areas of reclamation appear stable with a diverse mix of perennials, grasses and shrubs. Some species were beginning to go dormant as a result of a hot, dry July and some grasses exhibited new green growth as a result of August monsoon rains.
- Temporary seeding at the D Pit had sprouted well and was providing shade and root structure to the recent backfill, graded and topsoiled areas.

#### *FISH and WILDLIFE– RULE 4.18*

Wildlife sightings included red and white tailed hawks, ravens and waterfowl.

#### *INSPECTION, ENFORCEMENT and CIVIL PENALTIES – RULE 5*

##### *Inspections 5.02; Availability of Records*

- As this was a complete inspection, records were checked. See any highlighted items on the records check list.
- Seismographs will be ready for calibration by September.

#### *DOCUMENTS RECEIVED*

None

#### *ENFORCEMENT ACTIONS/COMPLIANCE*

No enforcement actions were initiated as a result of this inspection, nor are any pending. Previous actions are listed below.

### **PHOTOGRAPHS**



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**Photo 3:** Permit boundary signs at the PR11 expansion area.



**Photo 4:** East Buzzard Pond #3 rock piled for spillway repairs.

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***Photo 5:*** East Buzzard Pond #3 holding a small amount of water.



***Photo 6:*** Coyote Pond holding water and the dragline working in J Pit.

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*Photo 7: Ash Pit looking toward the east.*



*Photo 8: D Pit looking south up the constructed drainage.*

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**Photo 9:** No Name Pond holding water and discharging clear water.



**Photo 10:** N Pit south highwall rock fall of approximately 20 feet wide.

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***Photo 11: N Pit overview of south wall and highwall miner.***



***Photo 12: N Pit activities at the west end, looking west.***

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***Photo 13:** DealPond #1 looking up the drainage.*



***Photo 14:** Middle Flume #1 Pond exhibiting a verdant growth of vegetation.*

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*Photo 15: Middle Flume #3 Pond exhibiting a verdant growth of vegetation.*



*Photo 16: Jeffway from above looking sout east.*

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## AVAILABILITY OF RECORDS

### PERMIT RECORDS

DRMS Permit	Exp. 12/31/2027
Permit Application w/Revisions	Yes
Findings Document	RN8
Insurance Certificate	EXP. 1/2025
Bond Document	OK
Phased Bond Release	SL24
Documents/Findings	
Air Emission Permits	OK
County Special Use Permits	OK
UG Mining Landowner Notification	NA
Subsidence Monitoring Reports	NA
Subsidence Monitoring Data	NA
Rill & Gully Survey	NA

Vegetation Monitoring Data	SL22
Specific Variance Approvals	NA
Annual Reclamation Reports	2023
Midterm Review Documents	MT7
DRMS/OSM Inspection	Through July
Reports/Enforcement Actions (3 Years)	2024

Transfers/Succession of Operator	Na
Temporary Cessation Notification	Na
Reclamation Cost Estimate	RN8 App A VolV

### CERTIFICATIONS

Pond Certifications	App Q Sect XVI
Annual Certifications for Impoundments	July 2024 Coyote
Fill Certifications for Excess Spoil or Underground Development Waste	Horse Gulch Q2
• Quarterly Inspections	2024 Q2
• Compaction Testing	NA
• Final Certification	NA
Coal Processing Waste Banks	OK
Haul Road Certifications	App S PR11
Access Road Certifications	M52

### HYDROLOGIC RECORDS

NPDES Permit	Yes
NPDES Records	June 2024
Stormwater Management Plan	NA
SPCC Plan	2012 July updated
MSHA Pond Inspections	2024 Aug
State Engineer's Pond Inspection	
Quarterly Pond Inspections	2024 Q2
Annual Hydrology Reports	2023
• Ground Water Monitoring	Yes
• Surface Water Monitoring	Yes
• Spring & Seep Monitoring	Yes
• Mine Water Discharge Monitoring	Yes
• Mine Inflow Study	NA
• Water Consumption Records	Yes
Well Permits	Yes

### BLASTING RECORDS

Blasting Publication	Feb 2024
Blasting Records (3 years)	Yes
ATFE Explosives Permit	Yes, Exp. 2026
Blasting Variances	NA
Pre-Blast Surveys	Blasting Office

### ADDITIONAL RECORDS (specify)

County Ash Disposal	Book 2 Office
Certification, Seismographs Rule4.08.5	calibration date Sept 2023

COMMENTS: NPDES Permit number CO 00032115 renewed in 2020

Seismographs should be sent for calibration