



STATE OF  
COLORADO

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

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## Adequacy letter for SL-12

1 message

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**Zuber - DNR, Rob** <rob.zuber@state.co.us>  
To: "Moline, Ben" <ben.moline@molsoncoors.com>

Wed, Sep 4, 2024 at 5:09 PM

Hi again -

I know that I said I would send this tomorrow, but I decided to get it done this afternoon.

Please let me know if you have questions.

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.***

**Physical Address:**

1313 Sherman Street, Room 215  
Denver, CO 80203

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1001 East 62nd Avenue  
Denver, CO 80216

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**Keenesburg\_SL12\_DRMS\_Second\_Adequacy.pdf**  
86K



September 4, 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,  
Second Adequacy Review of Bond Release No. 12 (SL-12)**

Dear Mr. Moline:

The Division has determined that there is a contradiction between the equation for the Vegetation Cover Standard in the Permit Application Package (PAP) and in the SL-12 application.

Please see page 126 in Section 2.05 of the PAP. On this page the equation is:

$$y = 0.0127x^3 + 0.2115x^2 + 2.1772x.$$

In the application, the equation used to calculate the Vegetative Cover Standard (page 8 in the Revegetation Success Demonstration) is:

$$y = -0.0127x^3 + 0.2115x^2 + 2.1772x.$$

Notice the difference in the first term on the right side of the equation. The negative sign produces a large difference in the resulting y value. Please submit a Minor Revision that explains why the equation in the application is correct and submit a new version of page 126.

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.

Sincerely,

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

