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Twentymile Coal, LLC

February 13, 2025

Mr. Brock Bowles
Environmental Protection Specialist
Division of Reclamation, Mining, and Safety
1313 Sherman Street - Room 215
Denver, Colorado 80203
720-774-0040

Re: Twentymile Coal, LLC (TC) – Foidel Creek Mine (C-82-056), 2024 Annual Reclamation Report

Dear Mr. Bowles:

Submitted via Laserfiche is the 2024 Annual Reclamation Report (ARR) for the Foidel Creek Mine. During 2024, two projects were permitted under Minor Revision approvals (summarized as follows), with all of the permitted activities occurring within the existing Permit Area and most within existing disturbance areas, with changes in acreage noted below:

- MR24-325 – 6E Utility and WC Mains Utility Boreholes & Pad Sites. (Submitted 4/4/24 and approved 4/25/24, 5.5 acres permitted new disturbance)
 - 6E site was not constructed during 2024
 - WC Mains pad was constructed but no borehole was drilled.
- MR23-324 – 2024 Exploration Coreholes (Submitted 7/1/24 and approved 7/17/24, 6.1 acres new disturbance)
 - Corehole were completes and fully reclaimed in 2024

Changes in permitted, disturbed, and affected area acreages during 2024 included a total increase of 11.6 acres to the permitted disturbed acreage. The actual disturbed acreage is now 815.7. No additional acreage was added to the affected area or the permit boundary during 2024, keeping the total at 22,647 acres and 19,996.33 acres, respectively. Please refer to the latest maps and text associated with the revisions referenced above, for specific details.

Key mining and related activities occurring during 2024 included:

- Ongoing development and longwall mining operations in the Wolf Creek Reserve
- Ongoing refuse placement activities.

TC ARR 2024

- Sedimentation Ponds B, D and E were dredged to remove accumulated sediment as part of our ongoing drainage maintenance program
- Dewatering on the New West Mining District commenced.
- 6MN passive treatment system continues to develop.
- CDPHE discharge permit remains in administrative extension.

Under our ongoing noxious weed control program, TC contracted with Osborne Industries to complete noxious weed control spraying for both active and bond-released areas (approximately 100 acres), consistent with the approved Noxious Weed Control Plan (MR06-206). Areas sprayed for weeds are shown on the most recent map 29, Reclamation Map, and/or listed as follows (spot or area spraying, as appropriate):

- Substations electrical installations, propane storage areas, and surface conveyors (bare-ground spraying to address combustion hazard per MSHA)
- Both sides (approximately 30 to 40 feet) of facility roads
- Soil stockpiles
- Facility pad areas (e.g. 9RT, 10RT, 5MN, 6MN, 13LT, Fish Creek Borehole, 16LT, 18LT)
- Select areas on CRDA and associated soil/cover material stockpiles
- Pond embankments and perimeters

The spring spraying program (June) focused on spot or area spraying for control of white-top (hoary cress), houndstongue, knapweed, and mullein using Escort, Liberate, and 2,4D. The fall spraying program (August - September) focused on control of thistle, any residual weeds, and toadflax, which had previously been found on the site only as small, isolated occurrences, using 2,4D in combination with Tordon. Spraying was also conducted during the fall, within and around electrical installations, conveyors, and propane storage areas using Esplanade, Buccaneer, and Piper to eliminate all vegetation, as a fire-safety and MSHA consideration. Also part of the fall weed spraying is application towards all thistle varieties. As part of our ongoing land management programs, TC conducted managed livestock grazing activities on both affected and non-affected mine areas. The grazing activities are conducted by Camilletti and Sons, who graze around 8,000 yearly steers in the area annually (depending on range conditions).

There are several areas on the attached “2024 Annual Reclamation Report Disturbed Acreage” summary that are identified as “Reclaimed”. These areas have previously been regraded and stabilized with vegetation, however, TC has not pursued bond release for these areas due to the potential for re-disturbance in conjunction with required access and site maintenance activities.

Permit approvals and updated bond calculations during 2024 resulted in an overall increase in bond (\$157,158), increases in the calculated reclamation liability and required surety coverage, summarized as follows:

- MR24-325 – 6E Utility and WC Mains Utility Boreholes & Pad Sites (+\$42,596)
- MR23-324 – 2024 Exploration Coreholes (+\$114,562)

TC ARR 2024

Attached is the standard form (CDRMS) Annual Reclamation Report for 2024 and an updated disturbance summary. If you have any questions or require further information, please feel free to contact me directly at (970) 870-2718.

Sincerely,
For Twentymile Coal, LLC

A handwritten signature in black ink that reads "Miranda Kawcak". The script is cursive and fluid, with the first name "Miranda" and last name "Kawcak" clearly legible.

Miranda Kawcak
Manager Environmental

Attachments: CDRMS ARR Form, Disturbed Acreage Spreadsheet, 2024 Weed Spray Log