



March 4, 2025

Miranda Kawcak
Twenty Mile Coal Company
29515 Routt County Road #27
Oak Creek, CO 80467

RE: Foidel Creek Mine; C-1982-056; 2024 Annual Reclamation Report Review

Dear Ms. Kawcak:

The Colorado Division of Reclamation, Mining, and Safety (Division) has received and reviewed the 2024 Annual Reclamation Reports (ARR) for the Foidel Creek Mine for compliance with Rule 2.04.13. Below is a discussion of the Division's review. Bolded items are issues that the Division requests Twentymile Coal, LLC. (TC) to respond to by April 29, 2024.

Rule 2.04.13(1) – The ARR was received by the Division on February 13, 2025.

Rule 2.04.13(1)(a) – The cover of the ARR Form includes the name of the permittee, the address and the permit number.

Rule 2.04.13(1)(b) - The report indicates there were a cumulative total of 815.25 acres disturbed at the mine site. There were 8.35 acres of new disturbance in the calendar year of 2024. The total acreage approved to be disturbed in 2024 at the Foidel Creek Mine is 815.25 acres. *See adequacy item No. 1

Rule 2.04.13(1)(C) – The report indicated that 19.3 acres were backfilled and graded in 2024. The cumulative total reported 188.5 acres for those backfilled and graded.

Rule 2.04.13(1)(d) – The report indicated that 19.3 acres were topsoiled in 2024. The cumulative total reported 188.5 acres for those topsoiled.

2.04.13(1)(e) – The report indicated that 19.3 acres were revegetated in 2024. The total acreage reseeded at the mine site is 188.5 acres. 2.04.13(1)(f) – A total of 169.2 acres have been reseeded prior to 2024.

2.04.13(2) – Additional documentation provided with the 2024 ARR included; a cover letter, weed spray log, and a 'Disturbed Acreage Spreadsheet' which describes the location of disturbances. Weed control spraying occurred in June, August, September, and October of 2024.

Adequacy items:

1. In 2024, two revisions were approved, MR-325 and MR-326, for a total of 11.6 acres, according to the submitted applications. The ARR report only shows that 8.35 acres were disturbed. Please update the



2024 ARR to show that 11.6 acres were disturbed.

2. The ARR shows that 19.3 acres were seeded in 2024. Rule 2.04.13(1)(e) requires that seedtags need to be submitted. Please submit the seedtags verifying the seed mix used on the 19.3 acres.
3. Rule 2.04.13(3) requires that underground mines submit a map showing the current location of the active and inactive mine workings. Please submit the required map.
4. The Disturbed Acres itemized sheet submitted with the ARR shows a cumulative total of 815.70 acres have been disturbed. The ARR form shows that 815.25 acres have been disturbed. Please clarify the discrepancy.

It is noted that the Division interprets the submittal date of February 15, or other such date as agreed on identified per Rule 2.04.13(1) as the complete and accurate submittal of the Annual Reclamation Report covering the previous calendar year for all areas under bond. As such, please provide all responses to the Division's review of the Annual Reclamation Report within thirty (30) days of the date of this review.

If you have any questions, please contact me at (720) 774-0040 or brock.bowles@state.co.us.

Sincerely,



Brock Bowles
Environmental Protection Specialist