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

March 10, 2025

Basil Bear
Bowie Resources, LLC
P.O. Box 1488
Paonia, CO 81428

Re: Bowie No. 2 Mine, Permit C-1996-083,
Initial Review of 2024 Annual Reclamation Report (ARR)

Dear Mr. Bear:

I have reviewed the 2024 ARR for the Bowie No. 2 Mine (received February 13, 2025), and I have the following adequacy issues that need to be addressed.

1. BRL needs to revise the value for long-term facilities in the ARR acreage table, because the number was not decreased when the value for backfilled and graded was increased by 15.6 acres with the 2022 ARR. (This is an error made two years ago and not detected by me when I reviewed the 2022 ARR.) As a reminder, the value for total disturbance area must equal the sum of the area for backfilled and graded plus the total area for long-term facilities. Therefore, when values are added to the backfilled and graded category, they should be subtracted from the long-term facilities category.
2. There is another apparent error (or errors) that must be addressed. The text in the 2024 ARR states that the values for backfilled and graded, topsoiled, and seeded acres are all 119.3 acres. But that contradicts the ARR acreage table for all three of these values. Please add an explanation in the text of the ARR and/or revise the table, as appropriate. If it is helpful, please also create a new map to illustrate the different areas that have been reclaimed.
3. The left-hand column for the 2024 ARR should not be revised, and it should continue to match the right-hand column in the 2023 ARR. Any revisions prompted by the discussion in this letter should be reflected in the other columns of the form and detailed explanation provided in the text of the ARR.

If you have questions, do not hesitate to contact me at 720.601.2276 or rob.zuber@state.co.us. The Division would like to receive your revisions by May 9, 2025.

Thank you,

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

Copy via email: Ryan Wilson and Art Etter, Wolverine Fuels; Tamme Bishop, Consulting Engineer