

6473 County Road 120  
Hesperus, CO 81326

970.909.4022  
michael@summitmining.co



April 7<sup>th</sup>, 2025

State of Colorado  
Division of Reclamation, Mining & Safety  
1313 Sherman St., Room 215  
Denver, CO 80203

Attn: Environmental Protection Specialist

Re: GCC Energy, LLC, King II Mine  
CDRMS Permit # C-1981-035  
Sunder, Miller & Associates: Quarterly Inspection: Refuse Pile 1<sup>st</sup> Quarter 2025

Mr. Wein:

Please find enclosed a copy of Stoner Engineering's Quarterly Inspection report of the King I mine refuse pile/embankment for the 1<sup>st</sup> quarter of 2025.

Please contact me at 970.909.4022, or michael@summitmining.co if you have any questions or require any additional information.

Sincerely,

*Michael Dickson*

Michael Dickson

March 27, 2025

#5534219 Task 1

Jordan McCourt  
Project Coordinator  
GCC Energy, LLC  
6473 County Road 120  
Hesperus, CO 81326  
[jmccourt@summitmining.co](mailto:jmccourt@summitmining.co)  
(970) 385-4528

RE: King Coal I – Quarterly Waste Pile/Embankment Inspection

Dear Mr. McCourt:

On March 20, 2025, Stephanie Hinds, P.E., under guidance of Ryan Griglak, P.E., visited the GCC Energy, LLC King I Mine site to conduct inspection of the coal waste pile/embankment. Mr. Griglak, P.E. has conducted inspections for the placement of earthwork/embankment fill material for numerous commercial, residential and municipal projects in which buildings, roadways and parking facilities were installed over the placed materials.

The south treated water ditch (Reach 10) and the north clear water ditch (Reach 1) appeared to be in generally good condition at the time of the inspection. The previously washed-out, now repaired riprap of Reach 10 south haul road switchback remains in good condition and continues to prevent runoff from escaping the channel section (see Pic. 1). The angular riprap added to the upper section of Reach 10 appears to be controlling erosion as intended, though it should be kept under monitoring (see Pic. 2).

The face of the upper waste embankment pile was found to be in generally good condition (see Pic. 3). There were no signs of instability or sloughing observed on the main waste embankment pile at the time of the inspection. The waste embankment pile level appears to be relatively unchanged since the previous inspection. The grading of the upper waste piles appears to direct surface runoff away from the face of the piles and the required berming is in place. The slope of the top of the existing pile is close to that defined in the Waste Bank Design produced by Don May, 1997.

It does not appear that any additional fill material has been placed on the lower waste pile since the previous inspection. The face of the lower pile was found to be in good condition with no signs of instability or sloughing observed. The face of the lower waste pile is at a consistent height and the required berming is in place at the top of the pile to direct runoff away from the face of the embankment pile (see Pic. 4).

The only structure with any proximity to the embankment material is the old, abandoned bath house which is no longer utilized.

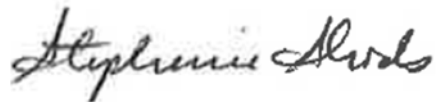
The waste pile has been and continues to be constructed and maintained as specified in the design approved by the Division of Reclamation, Mining & Safety. Potential hazards to life and property are minimal since GCC has moved most of their operations to their King II facility.

*Jordan McCourt*  
*March 27, 2025*  
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Please let me know if you have any additional questions or concerns in regard to the issues that are discussed above.

Sincerely,

SOUDER, MILLER & ASSOCIATES, INC.

A handwritten signature in black ink, reading "Stephanie Hinds". The signature is written in a cursive, flowing style.

Stephanie Hinds, P.E.  
Senior Engineer  
[stephanie.hinds@soudermiller.com](mailto:stephanie.hinds@soudermiller.com)

*Enc: Pictures*



Pic. 1a and 1b – Reach 10, riprap between upper and lower waste piles, preventing escape of runoff.



Pic. 2 – Reach 10, upper section channel riprap functioning as intended.





Pic. 3a and 3b – non-vegetated and vegetated face of the upper waste pile are in good condition.



Pic. 4 – Drainage off the lower waste pile into rock riprap is generally good condition.