



29515 Routt County Road 27
Oak Creek, CO 80467
970.879.3800

Twentymile Coal, LLC

April 1, 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 ARR Adequacy Response

Dear Mr. Bowles:

In response to your adequacy review dated March 4th, 2025, Twentymile Coal (TC) is submitting the following responses:

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.
 - a. The ARR only represent the actual disturbed acreage and does not account for all the permitted disturbed acreage. Although 11.6 acres were permitted only 8.35 were actually disturbed in 2025
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.
 - a. Seed tags are included with this submittal.
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.
 - a. The mine map is included with this submittal
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.

TC ARR 2024

- a. The ARR was corrected to reflect the 815.70 as shown in the disturbance sheet and is included with this submittal.

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.

Miranda Kawcak
Manager, Environmental

Attachments: 2025 Seed tags, Underground Mine Map, Updated CDRMS ARR Form

Colorado Division of Reclamation, Mining and Safety

Annual Reclamation Report for Calendar Year – _____

Mine Name	Permit Number	Permittee
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Address

This report, required by Rule 2.04.13, is due by February 15 of each year, or other date, as agreed upon by the Division. It should include text, discussion, and maps, at a minimum, in addition to any other reclamation monitoring data as required by the approved permit. The location of the acreage reported under each land status category and year of seeding (if applicable) should be clearly identified on a map included with the report.

Land Category	Last Year's Cumulative Total (from last year's ARR)	This Calendar Year			Cumulative Total
		Acres Added (+)	Acres Subtracted (-)		
Acreage in Active Mining Areas ¹				=	

Land Category	Last Year's Cumulative Total (from last year's ARR)	This Calendar Year			Cumulative Total
		Acres Added (+)	Acres Subtracted (-)		
Acres Disturbed ²				=	
Acres Backfilled and Graded				=	
Acres Topsoiled				=	

Acreage in Long-term Facilities ³	Last Year's Cumulative Total (from last year's ARR)	This Calendar Year			Cumulative Total
		Acres Added (+)	Acres Subtracted (-)		
Non-Permanent Facilities				=	
Permanent Facilities (permitted)				=	
Totals				=	

Acres Seeded (permanent)	Last Year's Cumulative Total (from last year's ARR)	This Calendar Year			Cumulative Total
		Acres Added (+)	Acres Subtracted (-)		
9 Years and Less				=	
10 Years and Greater				=	
Totals				=	

Bond Release	Last Year's Cumulative Total (from last year's ARR)	This Calendar Year			Cumulative Total
		Acres Added (+)	Acres Subtracted (-)		
Phase I Released				=	
Phase II Released				=	
Phase III Released				=	

¹Includes pits, topsoil stripped areas in advance of pits, and spoil not backfilled and graded

²Surface Mine Acres Disturbed = B&G + Long-Term Facilities + Active Mining Areas; Underground Mine Acres Disturbed = B&G + Long-Term Facilities; Separately-permitted Loadouts = B&G + Long-Term Facilities

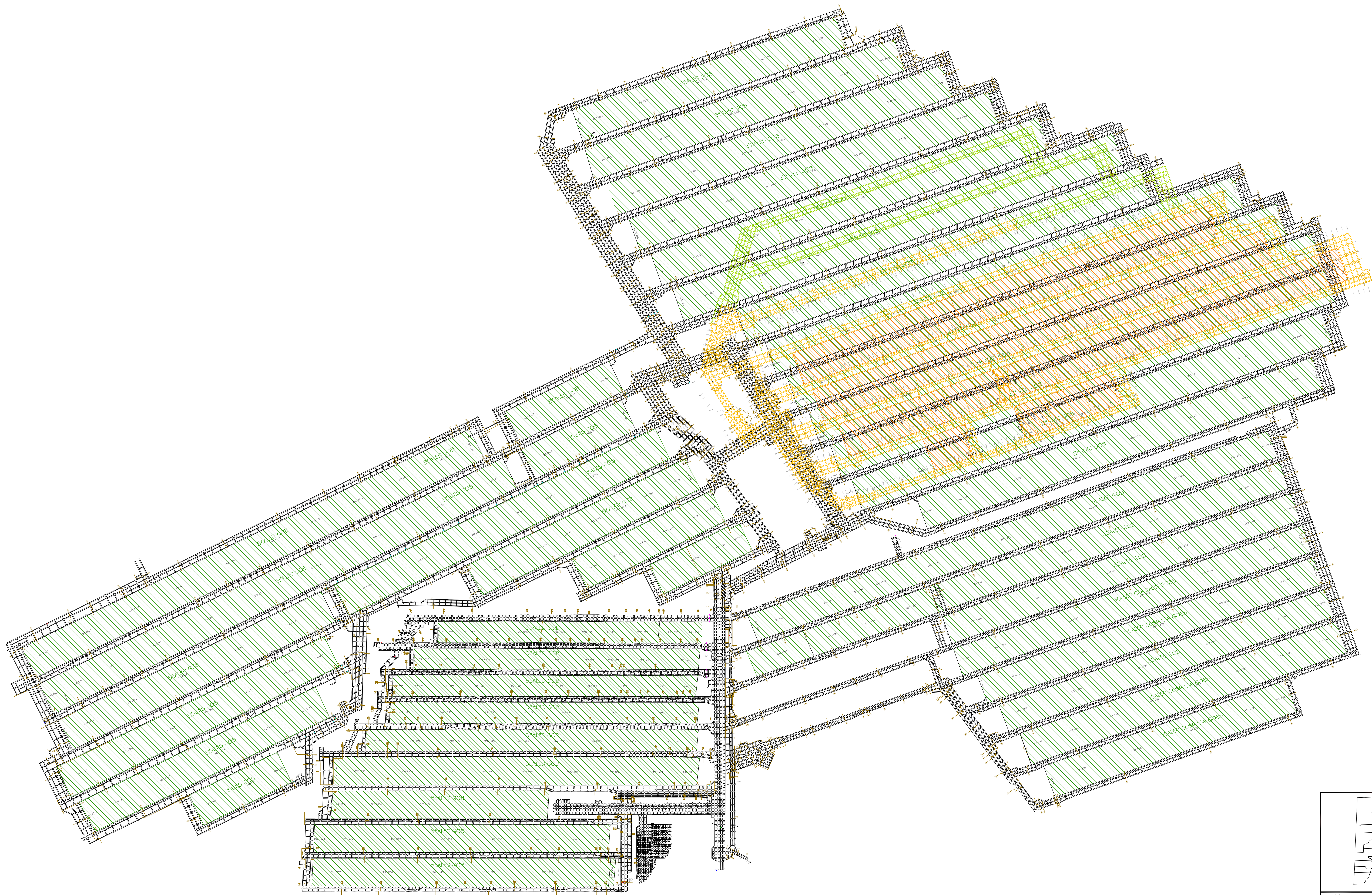
³Includes haul, access and light-use roads, temporary dams and impoundments; permanent dams and impoundments; diversion and collector ditches, water and air monitoring sites; topsoil stockpiles; overburden stockpiles; repair, storage and construction areas; office area, repair shops, and parking; coal stockpiles, loading, and processing areas; railroads; coal conveyors; refuse piles and coal mine waste impoundments; head-of-hollow fills; valley fills; ventilation shafts and entryways; and non-coal waste disposal area (garbage dumps and coal combustion by-products disposal areas).

Corehole Reclamation Seed tag



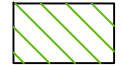
PASTURELAND SEED MIX			
LOT: G-241787			
Mixture/Variety:	Pure Seed %	Total Viable %	Origin:
SLENDER WHEATGRASS, SAN LUIS	17.88%	94.00%	WY
INTERMEDIATE WHEATGRASS, RUSH	17.55%	96.00%	WA
PUBESCENT WHEATGRASS, LUNA	17.16%	98.00%	MT
CRESTED WHEATGRASS, NORDAN	15.22%	83.00%	WA
SMOOTH BROME, VNS	8.67%	97.00%	KS
ORCHARDGRASS, PAIUTE	4.92%	86.00%	OR
MEADOW BROME, FLEET	4.30%	98.00%	CAN
TIMOTHY, CLIMAX	2.49%	85.00%	WA
CICER MILKVETCH, LUTANA	2.33%	90.00%	WY/MT
ALFALFA, LADAK			
* VNS = Variety Not Stated			
Crop Seed: 0.03 % Inert Matter: 4.37 % Weed Seed: 0.17 % Net Wt. 50#			
Noxious Weeds: NONE FOUND		Tested: JULY 2024	
CUSTOM MIX FOR FRONTIER STATION			
Buffalo Brand Seed	Greeley, CO 80631	(970) 356-4710	

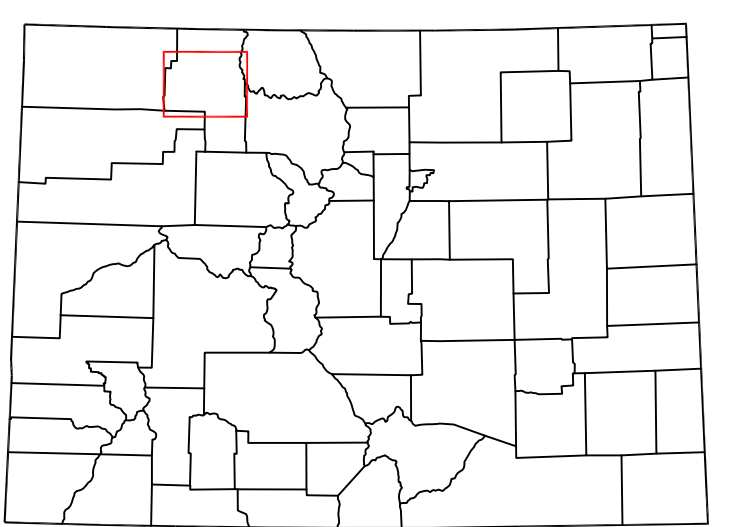
Refuse Pile Face Reclamation Seed tag

FOIDEL CREEK RANGELAND MIX			
LOT: G-241786			
Mixture/Variety :	Pure Seed %	Total Viable%	Origin
MOUNTAIN BROME, BROMAR	10.94%	97.00%	WA
SLENDER WHEATGRASS, REVENUE	10.87%	98.00%	WA
CHOKECHERRY, VNS	8.77%	60.00%	UT
WESTERN WHEATGRASS, ROSANA	6.50%	81.00%	WA
WOODS ROSE, VNS	5.99%	88.00%	NV
STREAMBANK WHEATGRASS, SODAR	5.64%	93.00%	WY
THICKSPIKE WHEATGRASS, CRITANA	5.58%	94.00%	WY
MOUNTAIN BIG SAGEBRUSH, VNS	4.64%	85.00%	UT
ANTELOPE BITTERBRUSH, VNS	4.19%	95.00%	ID
BLUEBUNCH WHEATGRASS, GOLDAR	2.95%	90.00%	WA
SMALL BURNET, DELAR	2.71%	97.00%	WA
GREEN NEEDLEGRASS, LODORM	2.66%	99.00%	MT
BIG BLUEGRASS, SHERMAN	1.71%	79.00%	WA
CICER MILKVETCH, LUTANA	1.57%	85.00%	WA
WESTERN YARROW, VNS	1.56%	86.00%	UT
MEADOW BROME, FLEET	1.53%	86.00%	WA
ALFALFA, LADAK	1.51%	90.00%	WY/MT
ROCKY MTN PENSTEMON, BANDERA	1.47%	91.00%	CO
BASIN WILDRIE, MAGNAR	1.41%	96.00%	WA
ARROWLEAF BALSAMROOT, VNS	1.41%	96.00%	ID
INTERMEDIATE WHEATGRASS, RUSH	1.38%	96.00%	WA
LEWIS BLUE FLAX, APPAR	1.37%	96.00%	WY
PUBESCENT WHEATGRASS, LUNA	1.35%	98.00%	MT
CRESTED WHEATGRASS, EPHRAIM	0.60%	95.00%	WY
ANNUAL SUNFLOWER, VNS	0.58%	97.00%	WY
SMOOTH ASTER, VNS	0.56%	47.00%	CO
ORCHARDGRASS, POTOMAC	0.35%	85.00%	OR
DOUGLAS RABBITBRUSH, VNS	0.22%	77.00%	NV
TIMOTHY, CLIMAX	0.21%	98.00%	CAN
RUBBER RABBITBRUSH, VNS	0.21%	80.00%	UT
* VNS = Variety Not Stated			
Crop Seed: 0.11% Inert Matter: 9.45% Weed Seed: 0.04% Net Wt: 19.1#			
Noxious Weeds NONE FOUND		Tested: 08/2024	
CUSTOM MIC FOR FRONTIER STATION			
THIS 19.1# BAG COVERS APPROX. 1 ACRE			
Buffalo Brand Seed	Greeley, CO 80631	(970) 356-4710	



LEGEND

-  CM MINED AREAS - (BLACK) WADGE SEAM
-  CM MINED AREAS - (ORANGE) WOLF CREEK SEAM
-  CM MINING PROJECTIONS - (BLUE)
-  UNMINED AREAS - (GREEN) WADGE SEAM
-  UNMINED AREAS - (ORANGE) WOLF CREEK SEAM



REVISION	REV'D BY	DATE

Twentymile Mine
29515 Routt County Road #27
Oak Creek, CO 80467

Peabody ENERGY

TWENTYMILE UNDERGROUND MINING STATUS MAP (ARR)

DESIGNED BY: Technical Services	COUNTRY: USA
DRAWN BY: Technical Services	STATE/PROVINCE: CO
APPROVED BY:	DATE: 03/31/2025
DATE: 03/31/2025	SCALE: 1" = 1,000'
SCALE: 1" = 1,000'	DRAWING SHEET: 1 of 1

