



"Safety as a Value"

Telephone: 970.385.4528
Facsimile: 970.385.4638

GCC Energy, LLC
6473 County Road 120
Hesperus, CO 81326

April 24th, 2025

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

Attn: Clayton Wein, Environmental Protection Specialist

Re: GCC Energy, LLC, King I Mine CDRMS Permit # C-1981-035
March 2025 Complete Inspection Maintenance Items #3 - Proposed Plan

Mr. Wein:

In response to the recent observations from the March 2025 Complete Inspection and subsequent discussions with the Division, GCC Energy (GCCE) has developed a plan to address coal dust accumulations identified within the permit and affected area boundaries, as well as to ensure the protection of Clearwater Ditch-1A (CWD-1A). The Division has granted GCCE a 90-day time frame to determine the source of the accumulated coal dust. This time frame started with the release of the March Inspection Report on April 16th, 2025, and will end on July 15th, 2025. This memo outlines the steps GCCE will take to mitigate the issue, minimize additional disturbances, and identify the source of the accumulations.

To formally define the area identified in the March Complete Inspection, GCCE specifies the affected zone as located between CWD-1A station points 11+80 and 13+20. These points will be clearly marked to support the following steps outlining the measures that will be implemented to mitigate coal dust accumulations, protect CWD-1A, and identify the source of the issue while minimizing additional disturbance.

1. Silt Fencing Installation:

Silt fencing will be installed on the hillside, along station points 11+80 to 13+20 of the CWD-1A. This measure aims to prevent any runoff from depositing fines into CWD-1A.

2. Addressing Coal Dust Accumulations:

- **Location:** The accumulations will be addressed only within the Disturbed Area Boundary, specifically between station points 11+80 and 13+20. Refer to the Maintenance Inspection Report and Map "King II-007 B" which are attached.
- **Method:** Cleanup will be conducted using handheld tools, such as rakes and shovels, to minimize vegetation disturbance and avoid displacing additional fines along the hillside. Care will be taken to ensure the accumulations are removed without exacerbating the issue.
- **Adjustments as Needed:** If additional accumulations are identified within the Disturbed Area Boundary but outside the area between station points 11+80 and 13+20, these will be addressed upon identification. GCCE will notify the Division upon completion of any such cleanup.

3. Monitoring and Reporting:

- **Continuous Monitoring:** The site will be regularly monitored throughout the 90-day inspection period granted by the Division, using the attached Maintenance Inspection Report. These reports will be filed throughout the 90-day period to track conditions and ensure the effectiveness of implemented measures.
- **Source Identification:** During the 90-day period, GCCE will attempt to definitively identify the source of the accumulations through monitoring. Once the source is identified, corrective actions will be promptly undertaken, pending Division approval. If additional time is required to determine the root cause, GCCE will submit a formal extension request to the Division before July 15th, 2025
- **Adjustments as Needed:** Any observations indicating that further action is required will be addressed promptly in coordination with the Division.



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r tqr qugf "r ncp0Please contact Michael Dickson at ; 920 2; 06244"qt "Lqtf cp"
O eEqwtv'cv'970.385.4528 x 6553 with questions or comments.

Sincerely,

Michael Dickson

Michael Dickson

Attachments: King II Maintenance Inspection Report, Map (King II-007 B
Clearwater Ditches As-Built).



GCC Energy, LLC
King II
Location: Hillside (Station 11+80 to 13+20)
Maintenance Inspection Report

Inspection Date:	___/___/___	Inspection Time:		Weather:	
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Inspection Checklist

Vegetation Area:

1. Is there fugitive coal dust visible in the disturbed are surface? YES ☐ NO ☐
 - a. If yes? How much of the surface is covered (i.e., size of area and depth)?

2. Are there any present erosions on the undisturbed surface? YES ☐ NO ☐
3. Has any runoff occurred from above the disturbed area boundary? YES ☐ NO ☐
4. Photography area? YES ☐ NO ☐

Rock Channel

1. Is there a present of sediment (dark colored) between the rocks? YES ☐ NO ☐
 - a. If yes? How much is present:

10%	20%	50%	70%	90%
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Silt Fences

1. Are the Silt Fences still structurally competent? YES ☐ NO ☐
2. Has there been any accumulation caught in the Silt Fences? YES ☐ NO ☐
 - a. If yes? Were the fences cleaned? YES ☐ NO ☐

Inspection Corrective Actions:

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Any deficiencies identified will be corrected within 1 week of inspection

Signature _____

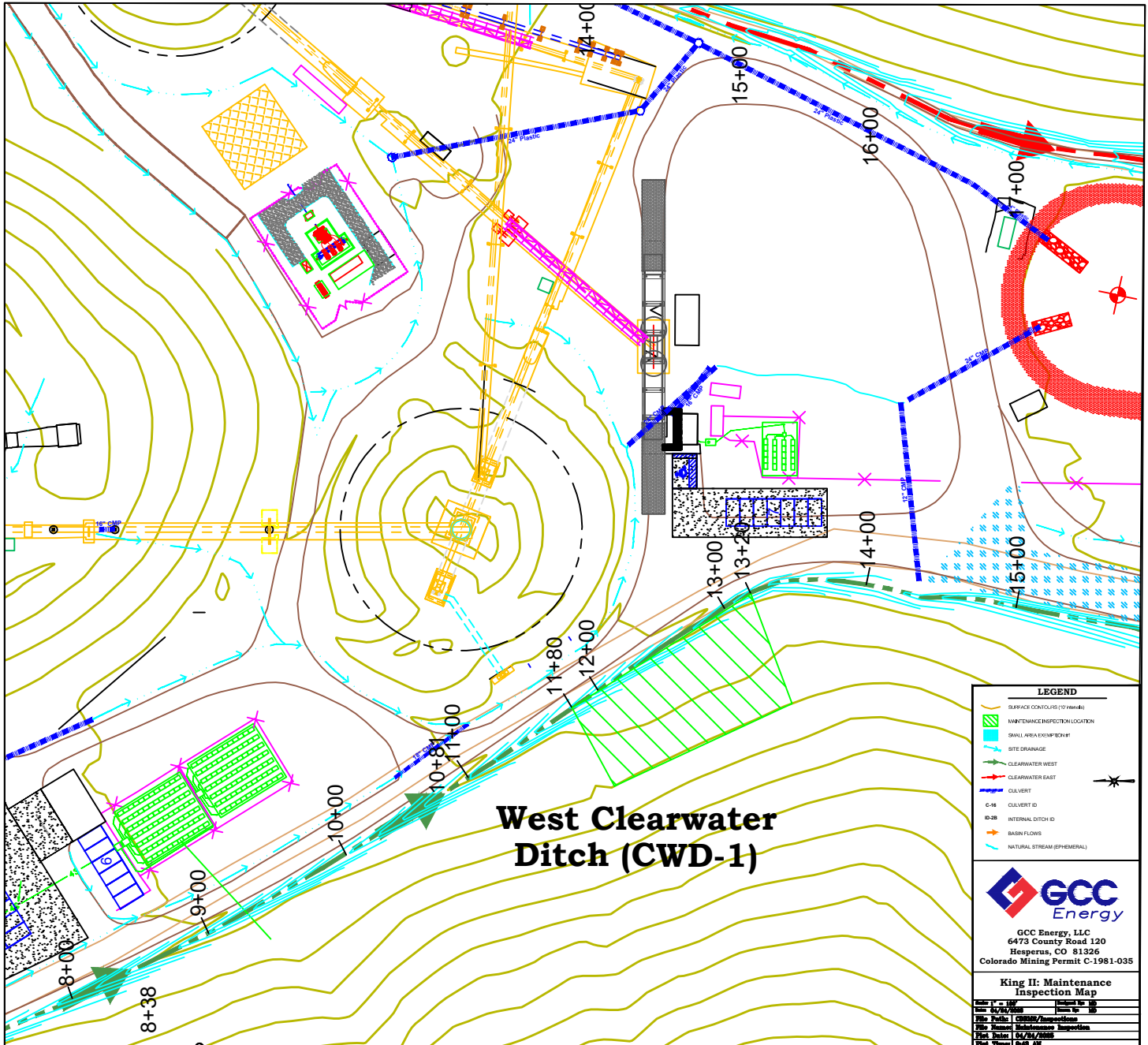
Corrective Action Close Date: _____

Owner	Version	Revision Date	Next Review Due	Page
Environmental Engineer	1.0	March 2025	March 2026	1 of 2

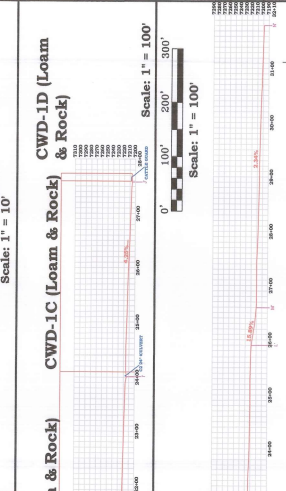
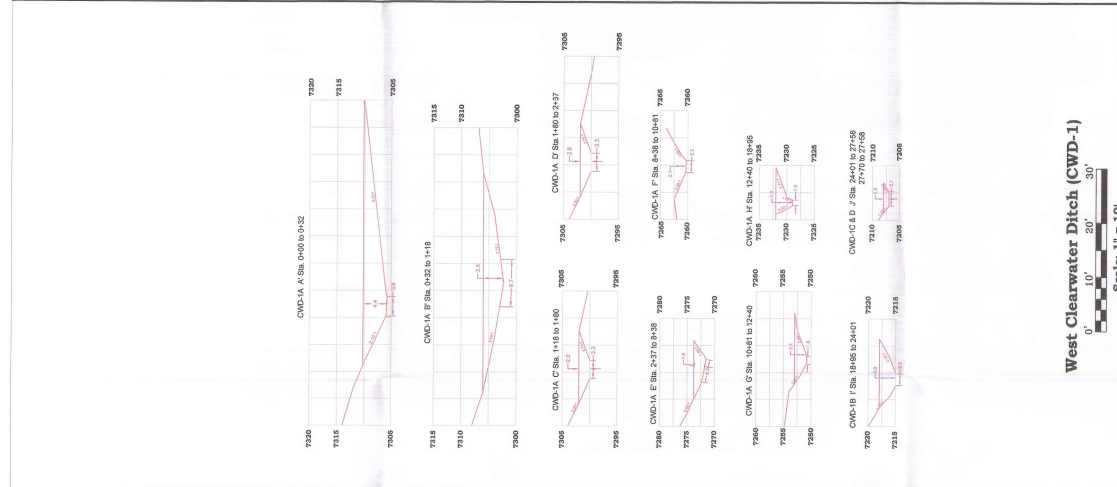
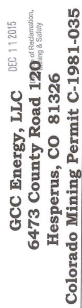
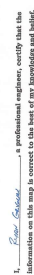


GCC Energy, LLC
King II
Location: Hillside (Station 11+80 to 13+20)
Maintenance Inspection Report

Inspection Location



Owner	Version	Revision Date	Next Review Due	Page
Environmental Engineer	1.0	April 2025	April 2026	2 of 2

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Scale: As Shown	Designed By: J. McCourt
Date: 12/03/15	Drawn By: J. McCourt
File Path: Environmental\King II\Permit Maps	
File Name: King II-007B Clearwater Ditches	
Plot Date: 12/03/15	
Plot Time: 3:55 pm	Approved 12/17/2015 -