



STATE OF
COLORADO

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Preliminary ADQ Seneca IIW TR83

1 message

Reilley - DNR, Robin <robin.reilley@state.co.us>

Thu, May 8, 2025 at 5:04 PM

To: "Kawcak, Miranda" <MKawcak@peabodyenergy.com>, Robin Reilley - DNR <robin.reilley@state.co.us>

Good Afternoon Miranda.

Please find DRMS's preliminary adequacy for the above referenced permitting action. DRMS requests further information on monitoring results and abandonment reports.

I'm available to answer any questions that come up.

Thank you

Robin Reilley, M.S. GISP
Environmental Protection Specialist II

image.png

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ADQ_Seneca_TR83.pdf
170K



8 May 2024

Ms. Miranda Kawcak
Seneca Property, LLC
29515 Routt County Road #27
Oak Creek, CO 80467

RE: Technical Revision TR83
Seneca IIW Mine, Permit No. C1982057

Dear Ms. Kawcak;

The Division has completed its preliminary review of **Seneca IIW Mine's** permit revision Technical Revision No. 83, TR83 received by the Division on 21 April 2025 via electronic submission. DRMS found the proposed revision complete on 1 May 2025. The proposed decision due date is 30 June 2025. This date is well after the bond release inspection date of 5 June 2025 for termination of jurisdiction is scheduled. Please submit responses to adequacy by 28 May 2025 in order to allow ample time for DRMS to review and respond.

This TR application possesses no introductory text outlining the purpose of the TR, only minimal rationale supporting the request and no data and analysis supporting the request. A series of revised pages with strike throughs was provided. In order for DRMS to make a finding of no hydrologic impact Seneca properties must provide additional information, and abandonment reports to support DRMS's review of the technical revision and for the public record.

Please see the Division's questions below regarding the applications compliance with the following Rules.

2.07.3.	2.05.6(3)	4.07.4
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Adequacy questions below are numbered and in italics.

DRMS 5 May 2025

Rule: 2.07.3

Seneca IIW has not yet provided proof of publication for TR83.

1. Please Provide Proof of Publication.

Seneca Properties requests removal of all ground water monitoring in preparation for abandonment procedures to take place prior to final release of the site through the SL8 terminaion of jurisdiction bond release scheduled for June of 2025.



DRMS 7 May 2025

Rule 2.05.6

DRMS reviews annual hydrology reports individually on an annual basis. DRMS notes that in Permit Section Appendix 15-3A *Current Hydrologic Monitoring Program* the most recent 2016 revision Seneca Properties committed to abandoning certain wells DRMS notes as per page 15-3a-6 wells with a double strikethrough will be abandoned. Wells with a single strikethrough will be suspended (ie, monitoring will be discontinued until one year prior to final bond release for the entire suite of parameters). DRMS finds in the 2024 water year Annual Hydrology Report the annual monitoring results for wells not suspended, however DRMS does not find the semiannual, triannual and annual results for the wells designated suspended in Table I (Pg. 15 – 3a-6) of Appendix 15-3A).

- 2. Please indicate to DRMS that monitoring occurred for the suspended wells for the 2023-2024 water year as per Appendix 15-3A and cite the reference document for this data.**

DRMS 7 May 2025

Rule: 4.05.14, 4.07.3 and 4.07.4

- 3. Will any wells including any proposed for reduced monitoring remain post-bond release? If so, please identify them and provide proof these wells are approved to remain for other purposes by the Colorado Division of Water Resources (State Engineer); and/or please provide proof these wells have been legally transferred in accordance with Rule 4.05.14?**
- 4. Pursuant to Rule 4.07.3(2)(c) please provide abandonment reports for any wells abandoned as per Table 1.**
- 5. Also, Pursuant to Rule 4.07.3(2)(c) please provide abandonment reports for any wells planned to be abandoned prior to final bond release.**

DRMS has no further questions regarding the above mentioned permitting action.

Sincerely,



Robin Reilley, M.S. GISP
Environmental Protection Specialist II
Robin.reilley@state.co.us