



STATE OF
COLORADO

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Trapper Mine Midterm Review and Findings MT9

1 message

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

Tue, Jun 17, 2025 at 5:06 PM

To: Graham Roberts <graham.roberts@trappermine.com>, Robin Reilley - DNR <robin.reilley@state.co.us>

Good Evening Graham,

Please find DRMS's Midterm Review and findings document for Trapper Mine attached. Please contact me with any questions and concerns.

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

image.png

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Trapper_MT9_Findings_2025.pdf

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

June 17, 2025

Trapper Mining, Inc.
Attn: Graham Roberts
P.O. Box 187
Craig, Colorado 81626

RE: Trapper Mine, C1981010, Midterm Review No. 9 (MT9)

Dear Mr. Roberts,

The Colorado Division of Reclamation, Mining and Safety has completed a Midterm Review of the Trapper Mine permit. The Midterm Review Findings Document is enclosed. If you have any questions, please feel free to contact me at (720)-646-0277.

Sincerely,

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



Midterm Permit Review No. 9
(MT9)

Tapper Mine
Permit No. C1981010



Michael Cunningham, Director

Prepared by
Robin A. Reilley, GISP
Environmental Protection Specialist II
16 June 2025

This document presents the results of Midterm Permit Review MT9 of the Trapper Mine, LLC.'s (TMI), Trapper Mine. The Colorado Division of Reclamation, Mining and Safety (The Division), conducted this review for the purpose of fulfilling the requirements of the Colorado Surface Coal Mining Reclamation Act and the Regulations of the Colorado Mined Land Reclamation Board for Coal Mining. Detailed information about the review process can be found in the Act and the Regulations of the Colorado Mined Land Reclamation Board for Coal Mining. All Rules referenced within this document are contained within the Regulations and in the *Guidelines Regarding Selected Coal Mine Bond Release Issues*, dated April 18, 1995. All "Sections" referenced within this document are contained within the Regulations, unless otherwise noted. Detailed information about the mining and reclamation operations at SPL are available in the Trapper Mine Permit Application Package, accessible on the Division web site: <https://drms.colorado.gov/data-search>

This Midterm Review was conducted to fulfill the requirements of Sections 2.08.3, 2.06.2(10), 2.06.3(4)(a), 2.06.5(3), 2.06.7(5) and 3.02.2(4).

Section 2.08.3 of the Regulations requires that the Division conduct a review of each permit issued, prior to its midterm. Based on this review, for good cause shown, the Division may require reasonable revisions or modifications of the permit provisions to ensure compliance with the Act and Regulation.

Section 3.02.2(4) requires that the Division review the amount of the bond and the terms of acceptance of the bond every 2 ½ years.

Sections 2.06.2(10), 2.06.3(4)(a), 2.06.5(3) and 2.06.7(5) require that experimental practices, mountaintop removal variances, variances from approximate original contour (AOC) for steep slope mining and variances from contemporaneous reclamation for combined surface and underground mining, respectively, be reviewed by the Division where applicable during the Midterm Review.

This Midterm Review consisted of a detailed review of the following documents:

- The Trapper Mine permit application, including stipulations and responses
- All revisions made to the permit since the issuance of the permit
- The Trapper Mine annual reclamation and hydrology reports
- Bond surety and reclamation cost estimate
- The Division findings documents
- The Division's inspection reports
- Any notices of violations since the issuance of the permit.

Section I History

Operations

Utah International Inc. began exploration drilling operations for Trapper Mine in 1954 to obtain geologic information on the structure of coalbeds and estimates of mineable coal reserves. In 1973, Utah International Inc. and four electric utilities signed a contract for delivery of coal to fuel the Craig Generating Station. This coal delivery obligation of approximately 111 million tons over a 52 year period required strip mining six to seven thousand acres of land since the mining activities began in 1976.

Environmental studies for the Trapper Mine began in 1972 and intensified in 1973 and 1974. Most of those studies will continue throughout the life of the project. Trapper Mine endeavors to reclaim disturbed lands to as good as or better condition than before mining. TMI attaches a high priority to the reclamation programs, all of which are designed to protect wildlife, water, air quality and other environmental resources of the mine area.

The shop and warehouse buildings were completed in November 1975, while the office complex was completed in November of 1976. The construction of the first of three, 30 cubic yard walking draglines started in February 1976. Actual mining operations began in May 1977, and coal deliveries started in August 1978.

The original owner of Trapper Mine was Utah International, Inc. an international mining company. All initial permitting and mining efforts were performed by Utah International. In July 1982, Utah International formed the subsidiary, Trapper Mining Inc. to consolidate and hold the properties and rights that make up Trapper Mine. The owners of the Craig Generating Station, the electric utility receiving its coal from Trapper Mine, purchased Trapper Mining Inc. in July of 1983.

This findings document replaces Trapper Mine's previous findings document associated with Mid Term 8. Please note that much of the information in this document is derived from previous findings documents.

The application has been revised twelve times. With the most recent permit revision (PR12), submitted by TM1 in November of 2024. The Division, Issued a Decision and Findings of Compliance for Permit Revision No. on 21 in June 2025.

SECTION II Permit Review

Enforcement Actions

One enforcement action was issued by DRMS in June of 2023 and resolved in August of 2023.

Stipulations

The stipulation history associated with the Trapper Mine was reviewed as part of this Midterm Review process. The review included an investigation of the stipulation response file, revisions to the permit, and associated findings documents. Stipulations are a binding part of the permit and previously assigned stipulation numbers are not re-used. Any stipulations associated with the Trapper Mine permit and issued over the life of the operation not discussed in this Midterm Review document have been complied with or terminated.

Since the last Permit Renewal (PR8) in 2022, no stipulations have been placed on the permit.

Variances

Rule 2.06.7(5)

The Division previously granted variances (PR9), from approximate original contour requirements for portions of the Trapper Mine. These changes to post mining topography at the Trapper Mine were approved with Permit Revision No.9 (PR9). This variance has been updated and granted as changes to the reclamation configuration of L Pit changed with eastward expansion. PR12 approved a change to the original variance.

The Division reviewed another item that has no specific requirement in the Regulations requiring their review. Regarding the timing of backfilling and grading (Rule 4.14.1), TMI has been granted a variance from the requirement that this operation be performed within 180 days after coal removal. This variance was granted in the approval of a permit revision in 1988 (PR-02). Mining and reclamation activities are ongoing at the Trapper Mine and the variances continue to be necessary.

Bond

Rule 3.02.2(4)

A site wide reclamation cost estimate was developed by the Division as a part of the Permit Revision No. 12 (PR12), in May of 2025. The Division's reclamation costs have been updated since that date. The Division currently holds a corporate surety in the amount of \$40,500,000. The amount of performance bond reflects the Division's projection of reclamation costs should the Division be required to reclaim the site during this permit term and reflects bond releases for reclamation work completed. The current bond held is deemed adequate and no increase in bond is required.

SECTION III Permit History and Revisions

Minor Revisions, Technical Revisions, Permit Revisions, and Bond Release approvals to the Trapper Mine permit since the last Mid Term Review (MT8), proposed in August of 2020 are listed below.

Minor Revisions (MR)

Submittal	Proposed Decision Date(s)	Permitting Request
MR229	20 Nov. 2023	Redisturbance for additional topsoil stripping; J Pit
MR228	4 August 2023	L Pit diversion ditch relocated
MR227	12 June 2023	Resurvey of Archeology for J and L Pits
MR226	16 Oct. 2020	Topsoil stripping, diversion ditch to No Name drainage
MR225	16 June 2020	Drill 3 new groundwater monitoring wells; I/J Pits

Technical Revisions (TR)

Submittal	Proposed Decision Date(s)	Permitting Request
TR126	21 Dec. 2021	Midterm 8 Review and Responses
TR127	14 May 2021	Annual Reclamation Report 2020
TR128	16 Sept. 2021	Pit limit increases and update to Coyote Pond
TR129	30 June 2022	Annual Reclamation Report 2021
TR130	29 July 2022	Expansion I and L Pits
TR131	30 June 2022	Spillway modification; No Name Pond #2
TR132	10 Nov 2023	Stockpile extension I Pit, build dragline walk road
TR133	12 MY 2023	Annual Reclamation Report 2022
TR134	14 July 2023	Topsoil stripping; C and J Pits; expand J Pit
TR135	21 May 2024	L Pit expansion with 50.8 acres added disturbance
TR136	15 May 2024	Annual Reclamation Report 2023
TR137	7 April 2025	Annual Reclamation Report 2024

Permit Revisions (PR)

Submittal	Proposed Decision Date(s)	Permitting Request
PR12	5 May 2025	Additional L Pit cut and modify AOC variance.
PR11	19 April 2023	5 year mine plan update; 137 acre increase in permit area.
PR10	12 Oct. 2020	Mine plan for I and J Pits; 155 acres additional disturbance and 51.7 acres of redisturbance of Phase III reclamation.
PR9	7 August 2020	5 year mine plan update; AOC variance.

Surety Releases (SL)

Submittal	Proposed Decision Date(s)	Released Area Ph I (acres)	Released Area Ph II (acres)	Released Area Ph III (acres)	Reduction in Liability
SL25	24 October 2024	316.5		0.0	\$2,625,421
SL24	27 March 2023	0.0	298.3		\$99,348
SL23	9 December 2021			265.5	\$400,746
SL22	11 December 2020		170		\$439,038
SL21	11 December 2020	293.3			\$1,796,590

Midterm Adequacy Items

Pursuant to 2.08.3, the Division finds that the permit application C1994082 contains no deficiencies at this time, following the review for the purpose of fulfilling the requirements of the Colorado Surface Coal Mining Reclamation Act, and the Regulations of the Colorado Mined Land Reclamation Board for Coal Mining.