



**TRI-STATE**

June 25, 2025

Ms. Hunter Ridley  
Environmental Protection Specialist  
Colorado Division of Reclamation, Mining & Safety  
Department of Natural Resources  
1313 Sherman Street, Room 215  
Denver, CO 80203

**RE: Colowyo Coal Company L.P.**  
**Permit No. C-1981-019**  
**MR-264 Midterm Review (MT-9)**

Dear Ms. Ridley,

Tri-State Generation and Transmission Association Inc. (Tri-State) is the parent company to Axial Basin Coal Company, which is the general partner to Colowyo Coal Company L.P. (Colowyo). Therefore, Tri-State on behalf of Colowyo is submitting this response for minor revision 264 (MR-264) to Permit No. C-1981-019.

On June 18, 2025, the Division issued a completes review letter for MR-264. Tri-State has the following responses for the Division:

- 1. The change sheet lists 'South Taylor/Lower Wilson viii and ix (2 pages)' as pages to be removed and added back into the permit file. However, updated 'South Taylor/Lower Wilson viii and ix' pages were not included with Colowyo's MR264 submission. If changes were made to these pages, please provide the corrected pages to the Division to be included with other replacement pages.*

**Response:** South Taylor/Lower Wilson pages viii and ix are attached.

- 2. Item No. 30 states that Vol. 15 Rule 2, page 69 has been updated with corrected citations. However, an updated Vol. 15 Rule 2, page 69 was not included with Colowyo's MR264 submission or listed on the change sheet. Please provide the Division with the corrected page 69 to be included in the replacement pages.*

**Response:** Rule 2, page 69 is attached.

If you should have any additional questions or concerns, please feel free to contact Tony Tennyson at (970) 824-1232 at your convenience.



June 25, 2025  
Page 2

Sincerely,

DocuSigned by:  
*Chris Gilbreath*  
D250C711D0BF450...

Chris Gilbreath  
Senior Manager,  
Remediation and Reclamation

CG:TT

Enclosure

cc: Tony Tennyson (via email)  
File: C. F. 1.1.1.24

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## 2.05 OPERATION AND RECLAMATION PLANS

### 2.05.1 Objectives

The planned operations and reclamation will be similar to those presented in Volume 1, Section 2.05. Operational changes and information specific to the Collom Pit within the Collom mining area are described in the following sections of this permit revision application.

### 2.05.2 Operation Plan - Estimated Area for Life of Operation

Information regarding the permit term is delineated in Section 2.01.5. Information for the operation plan is delineated in Section 2.05.3. Likewise, for purposes of this application, the permit area identifies the area for the life of the mine

Colowyo will employ detailed and current engineering designs for all surface mining activities in order to maximize coal recovery. The open pit mining technique minimizes or eliminates coal rib losses and coal fenders. The mining operations described in Section 2.05.3 are designed for maximum coal recovery.

### 2.05.3 (1) Operation Plan – Production Methods

Colowyo has selected its mining procedures on the basis of information from numerous exploration drill holes which penetrated the overburden, the interburden, and the coal seams. Each phase of mining has been carefully scheduled so that all equipment can be operated in situations suitable to their design capabilities. The overall operation plan is designed to flow logically from topsoil removal through reclamation. The plan is designed to maximize coal recovery and minimize environmental disturbances. Colowyo's existing operation plan is described in detail within Volume 1, Section 2.05.3.

The locations of the areas to be mined are shown on the Mine Plan Map (Map 23B). Topsoil removal schedules and stockpile locations are delineated on the Topsoil Handling Map, (Map 28C Sheet 1). Topsoil will be removed from an area primarily during the summer and fall months to allow for advancement of mining. A buffer zone, with topsoil removed, will be left between the undisturbed area and the crest of the pit. Additional information on topsoil handling is presented in Section 2.05.3 (5).

The area to be mined within the Collom Pit covers an area of two long ridge lines at about 7900 feet in elevation which is bisected by a 100 to 200 feet deep valley formed by the stream channel of Little Collom Gulch. Ultimately the Collom Pit could cover about 880 acres and could be up to 600 feet deep in places.

Seams that can be mined in the Collom Pit include the Y, X, A, B, C, E, F, and G. The lowermost seam that could be developed is the G<sub>ab</sub>. As shown on the geologic cross-sections presented in Figure 2.04.6, all the coal seams in the Collom Pit are dipping at approximately 8 percent to the northeast. Cross section locations are shown on Figures 2.04.6 Sheets 1 and 2.

Given current market forecasts for coal sales, not all coal seams located within the Collom Pit are scheduled to be mined at this time. Should coal markets change, the Collom Mine Plan will be revised to mine additional seams as needed to meet contractual obligations. The current operating plan is to finish dragline operations in the South Taylor Pit, and then relocate the dragline into the Collom Pit in or around 2023. Once the dragline is in the Collom Pit, it will uncover the upper-most X coal seam and spoil overburden in the last-pass cut location. The truck/shovel fleet will excavate and transport X coal, and will also continue developing the Collom boxcut through the B,C,D and E coal seams.