



STATE OF
COLORADO

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C1980007, West Elk Mine, TR-157, Initial Adequacy Review

1 message

Simmons - DNR, Leigh <leigh.simmons@state.co.us>
To: "Munz, Robert" <RobertMunz@coreresources.com>

Mon, Jul 14, 2025 at 12:02 PM

Bob,

The Division's initial adequacy review of TR-157 is attached

Leigh Simmons
Environmental Protection Specialist



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

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Adequacy letter, West Elk, TR-157, 1.pdf
212K



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

Bob Munz
Mountain Coal Company, LLC
5174 Highway 133
Somerset, CO 81434

July 14, 2025

Re: West Elk Mine (Permit No. C-1980-007)
Technical Revision No. 157, (TR-157)
Initial Adequacy Review

Dear Mr. Munz,

The Colorado Division of Reclamation, Mining and Safety (Division) has completed the initial review of materials submitted by Mountain Coal Company, LLC (MCC) in support of the TR-157 application.

Please respond to the following adequacy items:

General Items

1. For all submitted items for TR-157, it must be clear where they fit into the existing PAP or if there are additional exhibits or appendices that should not be included in the PAP. This includes the name and number of the exhibit and page number. Examples include (but are not limited to) the tables of pond calculations and pages from the SEDCAD model.
2. Per Rule 2.05.3(4), analyses must be included for any new ditches and pipes to be used at the West Elk site for stormwater management. This includes new clean water ditches and pipes that carry water from ponds to a receiving water. Also, it must be clear how these materials fit into the existing PAP.
3. Per Rule 4.05.3(7)(c), the TR-157 submittal must include analyses and design drawings of energy dissipation where pipes and emergency spillways discharge to Sylvester Gulch.

Text for Section 2.05

4. The footers of text for Section 2.05 include the list of past revisions. The revised pages should also include the information for TR-157, as appropriate.
5. On pages 2.05-35 and 2.05-36 the text discusses ponds SG-2, SG-3, and SG-4 as if they are not new. For each of these ponds, the text states, "MCC's experience has been that the pond has not required cleaning that often." MCC must revise that text, since these ponds have not been built yet.



6. At the end of Section 2.05.3 there is a statement that Page 2.05-48 is blank. However, this page is not blank, and this statement must be revised.

Design Drawings for Ponds

7. Please check the scale bars on some of the design drawings for the ponds. It appears that some are inaccurate, and MCC must revise them accordingly.
8. On the pond design drawings, the sections should be labeled to clearly show the respective ends. For example, rather than A:A the label should be A:A'.
9. Regarding the drawing for the Typical RipRap Lined Emergency Spillway, it is unclear why there is no riprap on the sides of the channel, as is customary for riprap channels. MCC must explain this omission or revise the drawing.

Maps 53B and 54B

10. Map 54B needs to show the discharge pipes below the ponds.

Pages from SEDCAD Model

11. The pages for the SEDCAD model should include the names of channels, culverts, and ponds in the structure networking and details pages. Please revise, as appropriate.
12. Please explain how UHS values in the model were determined.
13. It appears that the crest lengths for the emergency spillways are incorrect. Please check and revise as necessary.
14. It appears that the side slopes for the emergency spillways are incorrect (SEDCAD does not match the drawing for a typical spillway). Please check and revise as necessary.

Tables with Pond Calculations

15. An explanation of the calculations in the seven pages in this file should be provided.

The decision due date for TR- 157 is August 22, 2025.

Yours sincerely,



Leigh Simmons
Environmental Protection Specialist