

STATE OF
COLORADO

Ridley - DNR, Hunter <hunter.ridley@state.co.us>

Phase I, II and III Bond Release Inspection Request (SL-25), Colwyo Coal Mine, C1981019

Ridley - DNR, Hunter <hunter.ridley@state.co.us>

Tue, Jul 22, 2025 at 1:16 PM

To: "Tennyson, Tony" <tony.tennyson@tristategt.org>, "Cummings, Thomas F" <tcummings@blm.gov>, "Monroy, Andrew E" <amonroy@osmre.gov>

Hello all,

Thank you for your attendance at our SL-25 release inspection last week. Please find attached the Division's report for the 7/17/2205 inspection. The Division's Findings document will follow in the coming weeks. Please let me know if you have any questions or concerns as you review the report in the meantime.

Kind regards,

Hunter Ridley (she/her/hers)

Environmental Protection Specialist I

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

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**InspReport_7_17_25_SL25_C1981019.pdf**


8456K



PERMIT INFORMATION

Permit Number: C-1981-019 Mine Name: Colowyo Coal Mine Operator: Colowyo Coal Company L.P. Operator Address: Mr Tony Tennyson 5731 State Highway 13 Meeker, CO 81641	County: Moffat, Rio Blanco Operation Type: Surface Permit Status: Active Ownership: Private
	Operator Representative Present: Tony Tennyson
Operator Representative Signature: (Field Issuance Only) 	

INSPECTION INFORMATION

Inspection Start Date: July 17, 2025 Inspection Start Time: 07:30 Inspection End Date: July 17, 2025 Inspection End Time: 11:00		Inspection Type: Coal Partial Inspection Inspection Reason: Surety Release Requested Weather: Clear	
Joint Inspection Agency: OSM		Joint Inspection Contacts:	
Post Inspection Agency: OSM		Post Inspection Contacts:	
Inspector(s): Hunter Ridley	Inspector's Signature: 		Signature Date: July 22, 2025

Inspection Topic Summary

NOTE: Y=Inspected N=Not Inspected R=Comments Noted V=Violation Issued NA=Not Applicable

N - Air Resource Protection

N - Availability of Records

R - Backfill & Grading

N - Excess Spoil and Dev. Waste

N - Explosives

R - Fish & Wildlife

R - Hydrologic Balance

N - Gen. Compliance With Mine Plan

N - Other

N - Processing Waste

N - Roads

R - Reclamation Success

R - Revegetation

N - Subsidence

N - Slides and Other Damage

N - Support Facilities On-site

R - Signs and Markers

N - Support Facilities Not On-site

N - Special Categories Of Mining

N - Topsoil

COMMENTS

This was a partial inspection at the Colowyo Mine conducted by Hunter Ridley of the Colorado Division of Reclamation, Mining and Safety (Division). Andrew Monroy of the Office of Surface Mining and Reclamation Enforcement (OSM), Tom Cummings of the Bureau of Land Management (BLM) and Tony Tennyson representing Colowyo Mine (Colowyo) accompanied the inspection. The focus of this inspection was for bond release as requested through Colowyo's SL-25 (Phase I, II and III) application and included a few other partial inspection areas around the site. A total of 1.8 acres, associated with the reclaimed East Pit, which encompasses the whole of Streeter South Side Ditch as shown on Map 1 of the SL-25 application, has been requested for release under SL-25. The weather was clear and sunny, and ground conditions were dry. Temperatures reached a high of about 80 degrees Fahrenheit.

BACKFILL and GRADING – Rule 4.14 Contemporaneous Reclamation 4.14.1; Approximate Original Contour 4.14.2; Highwall Elimination 4.14.1(2)(f); Steep Slopes 4.14.2, 4.27; Handling of Acid and Toxic Materials 4.14.3; Stabilization of Rills and Gullies 4.14.6:

Rule 3.03.1(2)(a) states, "Up to sixty percent of the applicable bond amount shall be released when the permittee successfully completes backfilling, regrading, and drainage control in accordance with the approved reclamation plan." The Division inspected the SL-25 requested areas in the East Pit to ensure Colowyo has met the drainage control establishment requirements outlined in Colowyo's PAP. The total acreage being requested for Phase I bond release is 1.8 acres and consists entirely of the Streeter South Side Ditch, an approved permanent conveyance structure. The ditch was walked in its entirety (Photos 1-5), and elevational GPS points were collected at eight different locations along the ditch. Data point locations were determined using a georeferenced image of 'Map 1 SL-25 Phase I Bond Release Areas', provided with the SL-25 application and are shown below on Map 1.

Visual inspection of the ditch also included inspection of ditch design such as channel depth, channel type, side slopes and channel material for comparison to approved design criteria for Streeter South Side Ditch. No erosional issues were noted within the requested release area, suggesting that grading and channel establishment has been constructed to encourage proper storm drainage as required. No areas were identified that would suggest stormwater has flowed or could flow outside of the approved channel area. Elevational GPS data will be post-processed and further compared to the data provided by Colowyo to verify the approved post-mining topography has been achieved. In depth analysis of these data points will be provided as part of the Division's Proposed Decisions and Findings of Compliance Document for SL-25.

Number of Partial Inspection this Fiscal Year: 1

Number of Complete Inspections this Fiscal Year: 0

REVEGETATION, RECLAMATION SUCCESS - Rule 4.15, Rule 3: Vegetative Cover; Timing:

At Phase II, Rule 3.03.1(2) (b) states, "Up to eighty-five percent of the applicable bond amount shall be released upon the establishment of vegetation which supports the approved postmining land use and which meets the approved success stand for cover, pursuant to 4.15.8...". Rule 3.03.1(3)(b) also states, "No more than 60 percent of the bond shall be released so long as the lands to which the release would be applicable are contributing suspended solids to streamflow or runoff outside the permit area in excess of pre-mining levels as determined by baseline data or in excess of levels determined on adjacent nonmined areas".

As part of the Colowyo SL-25 application, a statistical vegetation sampling analysis is not required, as revegetation standards outlined in Rule 4.15.8 do not apply to an approved permanent structure that is not being reclaimed. The channel is, however, approved to be a vegetated conveyance channel and was observed to be appropriately vegetated throughout its full length (Stations 0+00 to 16+50). Streeter South Side Ditch was approved to remain as a permanent structure in May 2025 under MR262. The SEDCAD demonstration for the 10-year 24-hour storm event which included Streeter South Side Ditch was reviewed and approved under the approval of Streeter South Side Ditch as a permanent structure, and shows that the ditch design prevents the contribution of suspended solids to streamflow or runoff outside the permit area in excess of pre-mining levels, as required in Phase II bond release criteria and Rule 4.05.3.(4).

HYDROLOGIC BALANCE - Rule 4.05; Drainage Control 4.05.1, 4.05.2, 4.05.3; Siltation Structures 4.05.5, 4.05.6; Discharge Structures 4.05.7, 4.05.10; Diversions 4.05.4; Effluent Limits 4.05.2; Ground Water Monitoring 4.05.13; Surface Water Monitoring 4.05.13; Drainage – Acid and Toxic Materials 4.05.8; Impoundments 4.05.6, 4.05.9; Stream Buffer Zones 4.05.18:

At Phase III, Rule 3.03.1(2)(c) states, "The remaining portion of the bond amount shall be released when the permittee has successfully completed all surface coal mining reclamation operations in accordance with this approved reclamation plan, and the final inspection and procedures of 3.03.2 have been satisfied. This shall not be before the expiration of the period specified for revegetation responsibility in 3.02.3". Although not specifically addressed in Rule 3.03.1, the evaluation by the Division must also comply with the considerations outlined in Rule 3.03.2(2). These include: "results of inspections and monitoring conducted pursuant to 4.05.13 and 5.02, the degree of difficulty to complete any remaining reclamation, and whether pollution of surface or subsurface water is occurring, the probability of future occurrence of such pollution, and the estimated cost of abating such pollution". Colowyo is *not* requesting release of groundwater or surface water monitoring requirements through SL-25. Additionally, all contributing acreage to the Streeter South Side Ditch has either been Phase III bond released or has been removed from the watershed following final construction of the Upper and Lower Section 3 Sediment Ponds approved in 2022 under TR155. Therefore, Colowyo remains in compliance with Rule 4.05.13.

Prior to the SL-25 inspection, four unused water monitoring wells were discovered adjacent to the northern end of Streeter South Side Ditch (Example Photo 3). These were originally used for water monitoring of the Streeter Valley Fill area, which has since been Phase III released and removed from Colowyo's permit boundary. All four wells were abandoned in the days before the SL-25 inspection.

Other areas observed as part of this partial inspection but not related to SL-25 include Prospect Pond, Section 28 Pond, EP1, EP2, EP3 and Final East Pit Ditch (Photos 6-12). All areas were free of erosional issues, had stable embankments, inlet/outlet areas were free of obstruction and were holding water as designed.

SIGNS AND MARKERS – Rule 4.02:

Number of Partial Inspection this Fiscal Year: 1

Number of Complete Inspections this Fiscal Year: 0

Mine identification signs were located at the mine entrance, throughout the site, and along State Highway 13. All information for compliance was observed.

FISH and WILDLIFE – Rule 4.18:

No negative impact to wildlife was observed. A few adult elk were observed across several areas of the site, along with observation of various waterfowl.

Table 1: Eight elevation points collected along Streeter South Side Ditch, locations shown below in Map 1 and follow location points chronologically north to south.

Data Point	Elevation (ft)
1	6910
2	6930
3	6950
4	6950
5	6960
6	6960
7	6970
8	6990

ENFORCEMENT ACTIONS/COMPLIANCE

No enforcement actions were initiated as a result of this inspection, nor are any pending.

Number of Partial Inspection this Fiscal Year: 1

Number of Complete Inspections this Fiscal Year: 0

PHOTOGRAPHS



Photo 1: View north looking towards the northern end of Streeter South Side Ditch.



Photo 2: Looking south across Streeter Fill and towards Streeter South Side Ditch.

Number of Partial Inspection this Fiscal Year: 1

Number of Complete Inspections this Fiscal Year: 0



Photo 3: Example of one of four wells along the edge of Streeter South Side Ditch that were abandoned.



Photo 4: View of the mid section of Streeter South Side Ditch.

Number of Partial Inspection this Fiscal Year: 1

Number of Complete Inspections this Fiscal Year: 0



Photo 5: View north of the southern end of Streeter South Side Ditch.



Photo 6: Prospect Pond.

Number of Partial Inspection this Fiscal Year: 1

Number of Complete Inspections this Fiscal Year: 0



Photo 7: View north of Section 28 Pond.



Photo 8: View southwest of EP2.

Number of Partial Inspection this Fiscal Year: 1

Number of Complete Inspections this Fiscal Year: 0



Photo 9: View east of Reach 2 of Final East Pit Ditch.



Photo 10: EP2 inlet, view southwest.

Number of Partial Inspection this Fiscal Year: 1

Number of Complete Inspections this Fiscal Year: 0



Photo 11: EP2 outlet, view south.



Photo 12: EP3, view south.

Number of Partial Inspection this Fiscal Year: 1

Number of Complete Inspections this Fiscal Year: 0



**Streeter South Side Ditch
Phase I, II & III Bond Release Area
1.8 Acres**

2

STATE HWY 3

Scale: 1" = 200'

LEGEND

- PERMIT BOUNDARY
- SECTION LINE
- STREETER DITCH
- ROADS
- STREAMS
- BUILDINGS/STRUCTURES
- PHASE III RELEASED AREAS
- RECLAIMED AREAS
- PHASE I, II, & III AREAS AS APPLIED FOR
- SEDIMENT OR STOCK POND

Streeter South Side Ditch Phase I, II & III Bond Release Areas

Map 1

COLOWYO COAL COMPANY
Colowyo Coal Company
1000 West 1000 North
Mesa, AZ 86001

REVISION

DATE BY CHK

COORDINATES IN 1982 27 DATUM NORTH ZONE, US FOOT

20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100										
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