



August 4, 2025

Mr. Clayton Wein
Environmental Protection Specialist
Colorado Division of Reclamation, Mining and Safety
1313 Sherman Street, Room 215
Denver, CO 80203

**RE: New Horizon North Mine
Permit No. C-2010-089
2024 Annual Reclamation Report Review Response**

Dear Mr. Wein,

Tri-State Generation and Transmission Association, Inc. (Tri-State), is the parent company to Elk Ridge Mining and Reclamation, LLC New Horizon North Mine. The New Horizon North Mine operates under the Colorado Division of Reclamation, Mining, and Safety Permit No. C-2010-089.

The Division's provided an adequacy review of the 2024 Annual Reclamation Report for New Horizon North Mine dated August 1, 2025. Tri-State has the following response to the Division's concern:


Adequacy Item #1:

The 2024 ARR lists 157.1 acres have been disturbed during the life of mine. The report also indicates that 154.8 acres have been topsoiled and seeded. There are 2.3 acres that have not been accounted for in the report. The 2.3 acres are associated with features requested by the landowner and approved to remain as permanent post-mining features. Please revise the 2024 ARR to incorporate the 2.3 acres into the Permanent Facilities category.

Response: The 2.3 acres noted for the Permanent Facilities category has been added to the 2024 Annual Report form, and a revised 2024 Annual Reclamation Report reflecting this addition has been provided for the Division.

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

Sincerely,

DocuSigned by:

D250C711D0BF450...
Chris Gilbreath
Senior Manager
Remediation and Reclamation

CG:TT

Enclosure

Cc: Tony Tennyson (via email) - C.F. 11.1 - G474-11.3(21)c-9

Elk Ridge Mining & Reclamation, LLC

PERMIT C-2010-089

NEW HORIZON NORTH MINE

2024 ANNUAL RECLAMATION REPORT

JANUARY 1, 2024 to DECEMBER 31, 2024

Table of Contents

A. Rule Requirements.....	1
B. Permittee	1
C. Disturbed Areas	1
D. Backfill and Grading.....	1
E. Reclamation Activities.....	2
1. Spoil & Topsoil Quality	2
2. Topsoil.....	2
3. Seeding	2
4. Soil Fertility Testing and Fertilizer Application	2
F. Wildlife Monitoring and Mitigation	2
G. Interim Revegetation Report.....	3
H. Weed Management	3

List of Tables

Table 1 – Stockpile Volumes at the End of Report Year.....	4
Table 2 – New Horizon North Reclamation Table	5

List of Figures

Figure 1 – CDRMS Annual Reclamation Report Form.....	6
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List of Attachments

Attachment 1 – Soil Testing Results
Attachment 2 – Fertilizer
Attachment 3 – Interim Revegetation Monitoring Report

List of Maps

Map 1 – Annual Reclamation Report Map

A. Rule Requirements

Rule 2.04.13(1)(a-f) states, by February 15, or such date agreed on, each permitted shall file an annual reclamation report covering the previous calendar year for all areas under bond. The report shall include, but are not limited to, text, discussion and maps which address:

- the name and address of the permittee and permit number
- location and number of acres disturbed during that year
- location and number of acres backfilled and graded during that year
- location and number of acres topsoiled during that year
- the species, location and number of acres of vegetation planted during that year, including any augmented seeding or cultural practices
- location, number of acres and date of planting for all previously revegetated areas

Per Section 2.04.13 of Permit No. C-2010-089 the New Horizon North Mine submits the annual reclamation report annually by March 15. Additional requirements for contents of this annual reclamation report can be found in Section 2.05.4(2)(d), Section 2.05.4(2)(e), and Section 2.05.6(2).

B. Permittee

Elk Ridge Mining and Reclamation, LLC
New Horizon North Mine
Permit No. C-2010-089
PO Box 628
Nucla, CO 81424

C. Disturbed Areas

During 2024, 0.0 acres of new disturbance occurred at the New Horizon North Mine.

At the end of 2024, the total disturbance was 155.9 acres. Of this, 0.0 acres are in long-term mining, reclamation, or facilities. All of the active mining areas have been backfilled, graded, and topsoiled. Therefore, there are no active mining areas exist at the New Horizon North Mine.

D. Backfill and Grading

During 2024, 0.0 acres were backfilled and graded.

E. Reclamation Activities

1. Spoil Quality

The spoil sampling and analysis program for the New Horizon North Mine is described in Section 2.05.4(2)(d), Table 2.05.4(2)(d)-1 of the approved permit. All areas for spoil quality (Bench 1) have been sampled for the entire mine site. Please see previous annual reclamation reports for the results of the analyses.

2. Topsoil

During 2024, 0.0 acres were topsoiled. Table 1 provides the overall stockpile volumes for the mine.

3. Seeding

The New Horizon North Mine permanently seeded 0.0 acres in 2024. Please see Table 2 for specific details on each reclamation unit, and Map 1 for the reclamation areas seeded to date.

4. Soil Fertility Testing and Fertilizer Application

The landowner conducted soil testing in 2024. The results of the test are presented in Attachment 1.

The landowner ordered and fertilized reclamation unit NHN-04 in 2024. Documentation of the fertilizer used by the surface landowner is presented in Attachment 2.

5. Irrigation

The Colorado Cooperative Company commenced water deliveries on April 25, 2024, and New Horizon North Mine began irrigation operations shortly thereafter. The Colorado Cooperative Company discontinued water delivery for the irrigation season on October 18, 2024.

6. Irrigated Pasture Yields

In 2024, the first cutting from reclamation unit NHN-04 yielded 210 tons, the second cutting produced 142 tons, and the third cutting produced 137 tons.

F. Wildlife Monitoring and Mitigation

No wildlife monitoring nor mitigation occurred in 2024.

G. Interim Revegetation Report

Interim vegetation monitoring occurred on reclamation unit NHN-06 in 2024, and a report with the monitoring results is presented in Attachment 3.

H. Weed Management

During 2024, various areas within the permit boundary were treated for noxious weeds by spot spraying and/or hand removal. The actual treatment sites were generally small and random and thus too small to accurately depict on a map.

Target species for noxious weeds included Knapweed(s), Thistle(s), White Top, Russian-olive, saltceder/tamarisk, burdock, mullein, halogeton, purple loosestrife, and Western whorled milkweed. Other target species are included in the Montrose County (2010) and San Miguel County (2002) Noxious Weed lists.

Table 1 – Stockpile Volumes at the End of Report Year

<u>Stockpile Type</u>	<u>Volume (Cubic Yards)</u>
Topsoil Pile 3 - Progresso	16,580

Table 2 – New Horizon North Reclamation Table

New Horizon North Reclamation Table							
Area	Reclamation Period		Status				Notes:
	Year	Acreage	Revegetated Years	Bond Release			
				Phase 1	Phase 2	Phase 3	
NHN-01	2017	3.7	8	2017	2022	2022	3.7 acres planted to Dryland Pasture
NHN-02	2017	2.7	8	2017	2022		2.7 Acres planted to Dryland Pasture
NHN-03	2018	20.6	7	2017	2022		20.6 Acres planted to Dryland Pasture
NHN-04	2019	88.3	6	2017	2022		88.3 Acres planted to Irrigated Pasture
NHN-05	2019	4.9	6	2017	2022		4.9 Acres planted to Dryland Pasture
NHN-06	2020	0.6	5	2024			0.6 Acres planted to Dryland Pasture
NHN-07	2023	34.0	2	2024			34.0 Acres planted to Dryland Pasture - Reclaimed Sediment Control Structures
Total		154.8					

Figure 1 - CDRMS Annual Reclamation Report Form

Colorado Division of Reclamation, Mining and Safety

Annual Reclamation Report for Calendar Year – 2024

New Horizon North Mine	C-2010-089	Elk Ridge Mining & Reclamation, LLC.
Mine Name	Permit Number	Permittee
P.O Box 628 – 27646 W. 5 th Street Nucla, CO 81424		
Address		

This report, required by Rule 2.04.13, is due by February 15 of each year, or other date, as agreed upon by the Division. It should include text, discussion, and maps, at a minimum, in addition to any other reclamation monitoring data as required by the approved permit. The location of the acreage reported under each land status category and year of seeding (if applicable) should be clearly identified on a map included with the report.

Land Category	Last Year's Cumulative Total (from last year's ARR)	This Calendar Year			Cumulative Total
		Acres Added (+)	Acres Subtracted (-)		
Acreage in Active Mining Areas ¹	0	0	0	=	0

Land Category	Last Year's Cumulative Total (from last year's ARR)	This Calendar Year			Cumulative Total
		Acres Added (+)	Acres Subtracted (-)		
Acres Disturbed ²	157.1	0	1.2*	=	155.9
Acres Backfilled and Graded	117.0	0	0	=	117.0
Acres Topsoiled	154.8	0	0	=	154.8

Acreage in Long-term Facilities ³	Last Year's Cumulative Total (from last year's ARR)	This Calendar Year			Cumulative Total
		Acres Added (+)	Acres Subtracted (-)		
Non-Permanent Facilities	0	0	0	=	0
Permanent Facilities (permitted)	0	2.3	0	=	2.3
Totals	0			=	2.3

Acres Seeded (permanent)	Last Year's Cumulative Total (from last year's ARR)	This Calendar Year			Cumulative Total
		Acres Added (+)	Acres Subtracted (-)		
9 Years and Less	154.8	0	0	=	154.8
10 Years and Greater	0	0	0	=	0
Totals	154.8			=	154.8

Bond Release	Last Year's Cumulative Total (from last year's ARR)	This Calendar Year			Cumulative Total
		Acres Added (+)	Acres Subtracted (-)		
Phase I Released	120.2	34.0	0	=	154.2
Phase II Released	118.6	0	0	=	118.6

New Horizon North Mine

Phase III Released	3.7	0	0	=	3.7
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¹Includes pits, topsoil stripped areas in advance of pits, and spoil not backfilled and graded

²Surface Mine Acres Disturbed = B&G + Long-Term Facilities + Active Mining Areas; Underground Mine Acres Disturbed = B&G + Long-Term Facilities; Separately-permitted Loadouts = B&G + Long-Term Facilities

³Includes haul, access and light-use roads, temporary dams and impoundments; permanent dams and impoundments; diversion and collector ditches, water and air monitoring sites; topsoil stockpiles; overburden stockpiles; repair, storage and construction areas; office area, repair shops, and parking; coal stockpiles, loading, and processing areas; railroads; coal conveyors; refuse piles and coal mine waste impoundments; head-of-hollow fills; valley fills; ventilation shafts and entryways; and non-coal waste disposal area (garbage dumps and coal combustion by-products disposal areas).

*The 1.2 acres subtracted from disturbance was a Phase III released area removed from the permit boundary in 2024.

Attachment 1
Soil Testing Report

SOIL ANALYSIS REPORT

CLIENT:	DUSTIN GARVEY
56904	PO BOX 646
	NUCLA, CO 81424




www.servitech.com

1602 Park West Dr.
PO Box 169
Hastings, NE 68902
800.557.7509
402.463.3522
Fax 402.463.8132

LAB NO:	108981
INVOICE NO:	605316
DATE RECEIVED:	03/12/2024
DATE REPORTED:	04/01/2024

SOIL ANALYSIS RESULTS FOR: DUSTIN GARVEY															FIELD ID: COAL MINE PIVOT														
METHOD USED:			1:1 Water-Soil			XSL(i)	LOI(r)	Cd Reduction		Bicarb P	Mehlich 3 ICP							Calculated DTPA	Mehlich 3 ICP										
Lab Number	Sample ID	Sample Depth	Soil pH	Buffer pH		Excess Lime	% Organic Matter	Nitrate-Nitrogen ppm	lb. N/A	Phosphorus ppm P	Potassium ppm K	Sulfur ppm	lb. S/A	Calcium ppm Ca	Magnesium ppm Mg	Sodium ppm Na	Zinc ppm Zn	Iron ppm Fe	Manganese ppm Mn	Copper ppm Cu	Boron ppm B								
108981	COAL MINE	0 - 8	7.8			Hi	0.9	9.3	22	6	171	49	118	10700	535	23	4.8	85.0	41.2	3.2	1.1								
METHOD USED:			Hg Thiocyanate																										
Lab Number	Sample ID	Sample Depth	Chloride ppm	lb. Cl/A																									
108981	COAL MINE	0 - 8	3	7.2																									
FERTILIZER RECOMMENDATIONS:															POUNDS ACTUAL NUTRIENT PER ACRE										Cation Exchange Capacity				
Lab Number	Sample ID	Crop To Be Grown	Yield Goal	Lime, ECC Tons/A to raise pH to:			N	P ₂ O ₅	K ₂ O	Zn	S	Mn	Cu	MgO	B	Ca	Cl												
				8.0	6.5	7.0																	CEC	%H	%K	%Ca	%Mg	%Na	
108981	COAL MINE	ALFALFA NEW SEEDING	6 tons				0	100	50	0	0	0		0	1.5	0		30	0	1	83	15	0						
SPECIAL COMMENTS AND SUGGESTIONS:																													
Lab Number(s): 108981 FORAGE LEGUMES (alfalfa or clover), NEW SEEDING: Applying 15 to 20 lb. of nitrogen can aid in establishing legumes, if soil nitrate is low. Do not apply excess nitrogen or it may stimulate competition from grassy weeds.																													
Lab Number(s): 108981 The CEC value calculated by cation summation has been adjusted to compensate for the presence of excess lime (reactive carbonates).																													
Lab Number(s): 108981 ZINC: The "c-DTPA-Zinc" equivalent was calculated from the Mehlich-3 ICP zinc value. Zinc fertilizer recommendations were calculated using the Mehlich-3 ICP zinc value.																													

Analyses are representative of the samples submitted	Samples are retained 30 days after report of analysis	Explanations of soil analysis terms are available upon request
Reviewed and Approved By:	Hans Burken Lab Manager	
The reported analytical results apply only to the sample as it was supplied. The report may not be reproduced, except in full, without permission of ServiTech.		Page 1 of 1 04/01/2024 3:32 pm
Your opinion is valuable to us. Please let us know what you think about our services! Send an email to feedback@servitech.com .		

Attachment 2

Fertilizer

InfoTrac 1-800-535-5053

FERTILIZER ORDERS

31396

428-2244

Date Ordered: 4/2/24

Landlord:

Dustin Garvey

Delivery Date: April 11th

Acres:

88

PPA:

283

GA:

0

Density:

Comments:

Alfalfa

Product	CWT		Price/CWT	Total
11-52-0	173.10	11-52-0	8650	
46-0-0	15.00			
0-0-60	75.00	(0-0-60)	3750	
Sulfur			12400	
82-0-0				
32-0-0		Baron	70	
8-20-5-5-.5			12470	
Baron	1.40			
Rental	249.50	Spinner	\$15/AC	
Spread Fee				
Totals				

X2

PAT

Location:

Nucla - call him.

Attachment 3
Interim Revegetation Monitoring Report