

PEABODY SAGE CREEK MINING LLC

Red Rock Pit

March 18, 2012

Mr. Dustin Czapla
Division of Reclamation, Mining and Safety
101 South 3rd, Suite 301
Grand Junction, CO 81501

RECEIVED

APR 20 2012

GRAND JUNCTION FIELD OFFICE
DIVISION OF
RECLAMATION MINING & SAFETY

**RE: Red Rock Pit, Permit No. M-1978-315
112 Permit Conversion Application
Response to Site Visit Comments (Round 4)**

Mr. Czapla,

Based on your comments during the April 17, 2012 site visit, where you indicated that you were concerned about re-establishment of vegetative cover on the high wall areas....PSCM has prepared the following response.

- *Pursuant to Rule 3.1.10(1)... "In those areas where revegetation is part of the Reclamation Plan, land shall be revegetated in such a way as to establish a diverse, effective, and long-lasting vegetative cover that is capable of self-regeneration, without continued dependence on irrigation, soil amendments or fertilizer, and is at least equal in extent of cover to the natural vegetation of the surrounding area.*

Response:

- 1) PSCM will replace the salvage growth medium on all areas where equipment can work safely (i.e. slopes flatter than 2H:1V). Where possible to be conducted in a safe manner, growth medium fines will be pushed off the crest of the pit to attempt to provide small micro-areas to allow seeds to germinate.
- 2) All disturbed areas, including the highwalls, will be reseeded. It is anticipated that broad-cast seeding will be the method used to reseed the disturbance area.
- 3) This approach will allow the revegetation to establish cover that is at least equal to the cover of the natural vegetation of the surrounding area in compliance with Rule 3.1.10(1).

Please contact me (Scott Cowman) at (970) 276-7003 if there are any further questions or concerns.

Sincerely,



B. Scott Cowman
Permittee Contact
Peabody Sage Creek Mine
Red Rock Pit