

STATE OF COLORADO

DIVISION OF RECLAMATION, MINING AND SAFETY

Department of Natural Resources

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16 October 2012

Donald MacDonald
Coors Energy Company
P.O. Box 467
Golden, Colorado 80402

**RE: Keenesburg Mine; C-1981-028, 2011 AHR Review
Response to Coors Sep. 10th, 2012 Letter; Proposed Revegetation Success Standards Equations**

Dear Mr. MacDonald,

The Division received your response to the review of the 2011 Annual Hydrology and Reclamation Report on September 12, 2012. The Division conducted a preliminary review of the proposal to revise the predictive equations used to project the revegetation success standards for cover and production at the Keenesburg Mine.

One item that will need to be addressed is an error in the precipitation value for the year 1995. Based on the Division's calculations it appears the precipitation amount from September of 1994 to July of 1995 should be 16.59 instead of the 16.77 as indicated in the response letter. This precipitation value modifies the predictive equations slightly.

The Division agrees with Mr. Savage's analysis that the correlation coefficients of the new predictive equations are lower than the currently approved equations. For the vegetation cover predictive equation, the currently approved equations yielded a correlation coefficient value of .9433; the new equation yields a value of .7698. Similarly for herbaceous production, the currently approved equation yielded a correlation coefficient value of .8948 and the new equation yields a value of .8414. Please provide documentation and rationale that the correlation coefficients yielded by the new equations are adequate.

This revision will need to be submitted in the form of a Technical Revision.

If you have any questions please feel free to contact me at (303) 866-3567 ext. 8120.

Sincerely,

Jared Ebert
Environmental Protection Specialist, DRMS

CC: Brock Bowels, DRMS
Mike Savage, Savage and Savage *via e-mail*.