

Twentymile Coal, LLC
Renewal/Extension for Existing Special Use
Permit No. PL-18-198

1. **Haul Route and Anticipated Traffic:** The renewal of this SUP would allow the continued use of Routt County Road 27 from the Foidel Creek Mine entrance (0.25 miles south of intersection of CR27 and CR33) in Section 28, Township 5 North, Range 86 West, to its intersection with U.S. Highway 40 to transport coal. Highway-legal tractor-trailer trucks will be used to transport the coal from the Mine's load-out facility to US Highway 40. No trucks will exceed the legal limit of 110,000 lbs loaded.
TC anticipates producing and shipping by truck no more than 2.5 million tons during the five year term of the extended permit. Production would be from the Foidel Creek Mine, Twentymile Loadout facilities. At this rate Twentymile would not exceed the current permit terms of 55 truck trips per day.
The proposed maximum annual truck haulage tonnage of 500,000 total tons, under the Permit renewal/extension is approximately 20 percent of the projected average annual shipments. The remaining tons are shipped by rail to local and out-of-state customers. Although the 500,000 tons covered by this Permit is only a portion of total production, in today's challenging economic and coal market conditions, it is an important component and factor in maintaining production levels, employment, profitability, and viability for TC's operations over the long-term.
2. **Dust & Air Pollution Control Plan:** In conjunction with the current SUP and DOT regulations, all loaded haulers are required to tarp their loads before leaving the mine site. This reduces any coal dust that may draft from the trucks on the haul route and reduces the potential for any loose coal to cause any safety concerns to other drivers on the route. Drivers will also be required to have electronic loggers that records and ensures the speed limit is being obeyed.
Dust mitigations are also in place during the loading of the trucks for the safety of the drivers and surrounding workforce. Water sprays and a wet scrubber unit is in place to filter and remove dust from the stoker loadout facility.
3. **Emergency Response and Fire Plan:** In the event of an emergency while on the haul route, Local Authorities will be called to handle to situation. Twentymile works closely with West Routt Fire district and has a fire plan in place if a fire were to break out near the mine site. If the incident is in close proximity or on the mine property the Twentymile fire brigade team will also respond to the incident. All incidents related to this haul will be reported to Routt County Planning within 3 days.
In the event of a coal spill on the haul route Twentymile will coordinate clearing of the road ASAP and the spill will be cleaned up and hauled off.
4. **Water Pollution Control Measures:** Although not relative to the haul route, which is managed by Routt County Road & Bridge, runoff and mine water discharges are passed through sedimentation ponds or treatment facilities prior to discharge at the mine site.

Small areas not within a controlled drainage area use Best Management Practices to treat water, i.e. include rock check-dams, vegetative filters, straw bales, silt fences and sediment traps.

5. **Noise Mitigation**: As stated in the current SUP, all trucks hauling coal per the SUP are required to be equipped with “Best Available Technologies” for muffling noise from engine brakes.
6. **Mitigation Plan (per Zoning Regulations)**: Twentymile Coal, LLC’s (TC) operations are located in a rural area zoned “Coal Mining”, which allows for the mining of coal and all related ancillary operations, and Agricultural/Forestry. TC submits that the Coal Mining zoning designation inherently includes the right to mine coal and ship it to its customers by rail and/or by truck. TC also submits that this existing right and the existence of past, present, and ongoing coal mining and transport activities have established a reasonable precedent that should be recognized as an existing condition by current and prospective future residents of the area. The coal haulage route falls within the “Agricultural/Forestry” zone and has limited residents residing on the haul route. Twentymile pays for ongoing maintenance and repair of RCR27 on an annual basis to offset the use and wear by the tractor/trailer trucks hauling coal.
 - a. Since 1996, Twentymile has provided approximately \$2.7 million for the partial reconstruction and upgrade of RCR27, spent \$2.1 million for a new roundabout on RCR27 at our Sage Creek Portal location, and in recent years, has paid the County an average of over \$60,000 annually to fund any incremental maintenance required due to the truck haul.