

**PS24-013**  
**PROJECT NARRATIVE**

# TWENTYMILE COAL, LLC – FOIDEL CREEK MINE PROJECT NARRATIVE

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**Type of Operation:** Underground Coal Mine and Related Operations

**General Location:** 23 miles south of Steamboat Springs at the junction of CR33 and CR27

**Proposal summary (for notice purposes):** Application for renewal and extension of SUP PP2014-035 (PL-21-160), and request for amendment to include two new auxiliary mine support pad locations (please refer to the attached Exhibit C-1 for brief description).

This SUP application requests renewal and extension of the existing SUP approval under PP2014-035 (PL-21-160) for mining and related activities for TC's Foidel Creek Mine for an additional 10-year term. It also requests amendment of the existing SUP to include the two new auxiliary mine support locations, as part of continuing and future operations. The 6-East Utility Borehole location and the WC Mains Utility Borehole Location will be used for utility boreholes from the surface into the mine workings.

**Existing conditions:** The Foidel Creek Mine has been in operation since the mid-1980's. As an underground mine, the surface disturbance associated with the mining and related operations is limited and involves only those areas associated with the required surface support facilities and controlled mining-related surface subsidence over the active mining areas. As part of a comprehensive mine permitting process with the Colorado Division of Reclamation, Mining and Safety (CDRMS), extensive field studies have been completed to characterize the pre-mining baseline environmental conditions. This detailed information is included in TC's CDRMS Permit document (Permit C-82-056).

The Mine area is dominated by the Twentymile Park Basin, a broad structural basin surrounded by rolling hills and sandstone outcrops. Four drainages cross the Mine area, Fish, Foidel, Middle, and Trout creeks. Fish and Trout creeks generally flow year-round, with Foidel and Middle creeks flowing primarily during spring runoff and following major thunderstorm events. There are several vegetation communities occurring over the Mine area, but a mixed sagebrush-grassland community dominates. Primary land uses include mining, livestock grazing, and wildlife habitat. Once mining is completed, any disturbed lands are generally returned to productive use as rangeland and wildlife habitat. A variety of wildlife species occur on the Mine area, including deer, elk, antelope, a variety of small mammals, reptile, amphibians, a wide variety of bird species, and a limited number of fish species in area streams. Given the limited surface disturbance and activity, mining and related operations have little impact on most of the wildlife species present in the area.

**Location and type of on-site facilities/structures:** Those facilities currently permitted under (PL-21-160) will continue to be utilized until such time as they are no longer needed to support ongoing and future mining and related activities, at which time they will be reclaimed. Existing Mine facilities are shown on Map 24.

**Acreage and location of all involved areas:** The acreage and location of the existing mine facilities currently approved under (PL-21-160) will remain the same. The Mine Permit Area encompasses 22,647 acres, and the surface disturbance area is approximately 830 acres.

**Number of employees and operating schedule:** The mine is an existing underground coal operation. The mine workforce is currently approximately 300 people. Workforce numbers may fluctuate up or down dependent on market conditions and other considerations. The Mine operates on a 24-hour per day, 7-day per week schedule, year-round.

**Date of commencement:** The proposed permit renewal/extension is for the continuation of the existing approved Foidel Creek Mine mining and related operations. The current permit approval expires on August 26, 2024, and the renewal/extension would take effect on that date, extending the permit through August 26, 2034.

**Phasing plan:** Subject to management approval and timely receipt of the required permit approvals, TC will continue to develop and mine the Wolf Creek Reserve (WCR). Mine production levels may fluctuate based on market conditions and other variables, but are projected to range from 1.5 to 3 MM tons per year.

The Planning Director will be notified of any significant changes to the projected schedule.

**Completion date:** As TC continues with the development and mining of the WCR, mining operations are projected to continue another 10 to 15 years, but highly dependent on market conditions and corresponding production rates. This timeframe extends beyond the term of the requested permit renewal/extension, so TC would anticipate the potential for submittal of future permit renewals to extend permit approvals as necessary to support continuation of mining and related operations and subsequent reclamation of all mining-related disturbance.

**Type of equipment on site:** The type of equipment currently approved under PP2014-035 will remain the same, and no new surface equipment is anticipated to be added. The WCR development and mining operations continue to utilize the same production, coal handling, and support equipment that has been utilized for past mining and related operations.

**Type of vehicles used for project:** Most of the Mine's production is loaded into dedicated unit-trains and transported to customers using the existing mine rail spur, which connects to the Union Pacific Railroad Craig branch-line near the Town of Milner. The Mine typically ships three to five trains weekly. Highway legal trucks will be used to transport the coal from the Mine's load-out facility to US Route 40, using RCR27. All off-site coal transportation is permitted with Routt County under separate SUP's. At the load-out, mobile surface equipment will be used to maintain the stockpiles. A road grader will be used as needed for on-site road maintenance. During the winter months, a snow plow with sander will be used to keep the mine roads open for traffic.

**Location of stockpiles for topsoil, overburden, etc, if any:** Coal stockpiles are located at various approved locations throughout the surface facilities area. Stockpiles include run-of-mine, sized product coal, coarse refuse, and numerous topsoil stockpiles.

**Drainage control on site, if grading, excavating, or building:** All run-off and sediment from mine-related surface facilities and disturbance is intercepted and routed to designed sediment control structures prior to discharge to natural drainages. For small, isolated, or temporary facilities or disturbance areas, appropriate site controls and management practices are used to effectively control, erosion, runoff, and sediment transport. All mine discharges are permitted with the Colorado Department of Public Health and Environment - Water Quality Control Division (CDPHE-WQCD) under several mine discharge permits.

**Roads to be used for project, and existing conditions of roads and anticipated improvements:** Existing mine roads will be used and are constructed and maintained in compliance with applicable regulatory provisions and requirements of TC's CDRMS Mining and Reclamation Permit C-82-056.

**Utilities and potable water/wastewater systems:** Electrical service for the Mine is provided by Yampa Valley Electric Association (YVEA), with connections to the YVEA system at several dedicated Mine substations. The Mine operates its own potable water and wastewater systems, which are permitted with the CDPHE-WQCD. The potable water system utilizes a dedicated potable water well and treatment system. The wastewater system consists of a collection system and a series of aerated sewage lagoons and polishing pond, followed by outlet treatment and a shallow groundwater infiltration system. Both the potable water and wastewater systems operate under the supervision of a licensed water/wastewater operator.

**Mine and process water sources and use:** TC's mining and related operations require significant quantities of water for dust control (both surface and underground) and coal processing. Generally, water is sourced primarily from underground mine water storage and surface runoff impoundments. TC has extensive water rights to support all current and anticipated mine water storage and use requirements. In addition, TC has an extensive water recycling program which is supported by the mine water storage reservoirs and an integrated system of mine dewatering wells, water treatment systems, and water transfer pipelines.

**Dust control plan:** The Foidel Creek Mine operates under an approved Air Emissions Permit (Permit 93-RO-1204) which specifies applicable emission control measures and monitoring requirements for all potential emission sources.

**Waste disposal plans:** Coal processing waste from the coal washplant is either placed in an engineered permanent coal refuse storage area (coarse refuse) or slurried and placed underground in sealed and abandoned mined-out areas (fine refuse). TC collects and recycles a wide range of solid waste materials (tires, batteries, steel scrap, wood waste, cardboard and paper, used oil, used antifreeze, and solvents) using qualified recycling contractors. Non-recyclable solid wastes are collected in transfer area for pick-up by a licensed solid waste disposal contractor. Non-recyclable liquid wastes are similarly collected in transfer areas for pick-up and disposal by a licensed waste disposal contractor.

**Hazardous materials:** TC carefully plans and manages operations to avoid or minimize the use or generation of any hazardous materials or wastes. Any hazardous materials used on site are stored and used in full compliance with applicable manufacturer's recommendations. TC maintains MSDS's for all chemicals and other materials stored or used on site, and all containers are labeled relative to contents. Any hazardous waste generated on-site are labeled and stored in a secure area (Old Washbay) for pick-up and processing by a licensed hazardous waste contractor.

**Emergency response and wildland fire plans:** TC maintains a comprehensive Emergency Response Plan which addresses a wide range of potential emergency situations, including, but not limited to wildland fire. Emergency response resources available on-site include fully-equipped and trained mine-rescue teams, a fully-equipped ambulance staffed by trained EMT's, a trained fire-brigade, and environmental emergency response materials and equipment. These resources are linked to and coordinated with the Routt County Emergency Services.

**Noise and visual impact mitigation:** TC's mining and related operations are located in a rural area with sufficient surrounding lands to create a reasonable buffer with residential and other non-industrial uses. The majority of TC's surface facilities and activities occur within areas zoned for "Mining" uses, and thus are compatible with surrounding lands and uses. Potential noise and visual impacts from the related surface activities are effectively mitigated by enclosures and sound-suppression systems on process equipment and ventilation installations, and through siting, design, and the use of earth-toned coatings and downcast lighting on surface structures and facilities.

**Reclamation plan:** The mine facilities are part of TC's existing facilities, and detailed final grading and reclamation plans are included in TC's CDRMS Permit C-82-056. As an integral part of TC's comprehensive reclamation plans, TC has an ongoing water development program, and is working with Colorado Parks and Wildlife and a grazing leasee on an ongoing cooperative wildlife management program and grazing management plans.

**Landscape plan including plant materials:** The approved CDRMS reclamation plans include grading to the approximate original contours, restoration of effective site drainage, replacement of suitable soil materials, and revegetation using approved seed mixtures to restore stable, self-sustaining vegetation communities which are compatible with the approved postmining land uses. Approved revegetation seed mixtures include rangeland, pastureland, and cropland mixtures dominated by plant species native to the area, with some adaptive introduced species to achieve specific reclamation objectives.

**Weed control plan per Weed Control Act of 2003:** The site will be stabilized with vegetation, and weeds will be controlled, as needed, and consistent with TC's Weed Management Plan. Post-reclamation management will also include regular inspection of reclaimed areas, repair of any significant erosional features, reseeding, as necessary, and assessment of reclamation success relative to the permit requirements and commitments.

**Proposed future land use(s) and its locations:** All surface disturbance associated with ongoing and future mining and related operations will be reclaimed to the postmining land uses of rangeland and wildlife habitat.

## **PROPOSAL SUMMARY**

**TWENTYMILE COAL, LLC – FOIDEL CREEK MINE  
RENEWAL AND AMENDMENT TO  
SPECIAL USE PERMIT NO. PP2014-035**

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**Proposal Summary:**

Special Use Permit No. PP2014-035 (SUP), addresses Twentymile Coal, LLC's (TC) ongoing coal mining and related operations for the Foidel Creek Mine. The existing permit approval officially extended the SUP from August 26, 2014 through August 26, 2024. Multiple amends were made to this SUP during the last 10 years with the most recent being TPL21-160. TC is requesting that the existing SUP be renewed and extended for an additional ten-year term.

Under the Conditions of Approval, there are a number of Specific Conditions which will be carried forward with the requested permit renewal, including Specific Conditions 15, 16, 18, 19 20, 22, 24, 25, 26, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, & 40. The remaining Specific Conditions relate to activities that have already occurred, and for which the related conditions have been met.

In conjunction with this permit renewal, TC is also requesting that the existing SUP be amended to include the construction of two new pad locations (6 East Utility borehole, and WC Mains Utility Borehole), as part of our continuing and future operations.

The current SUP No. PP2014-035 is scheduled to expire on August 26, 2024. The requested renewal/extension to the SUP will extend the required approvals through August 26, 2034.