



October 29, 2015

OSMRE Trapper 1 Mine MPDD EA  
C/O Nicole Caveny  
Western Region Office, OSMRE  
1999 Broadway, Suite 3320  
Denver, CO 80202-3050

RE: C-079641 and C-07519 EA

Dear Ms. Caveny:

Associated Governments of Northwest Colorado (AGNC) strongly supports the reissuance of the Trapper Mining coal mining permit currently being reviewed through an Environmental Assessment (EA) being conducted by the Office of Surface Mining Reclamation and Enforcement (OSM) in response to the Colorado Federal District Court ruling. This mine has been operating in full compliance with all federal and state environmental requirements since the issuance of the original permit and has been recognized with numerous awards for its environmental and reclamation efforts and successes.

Trapper Mining operates in Moffat County in Northwest Colorado where it employs approximately 180 people directly and hundreds indirectly. Many of these employees span multiple generations and are deeply rooted in the Craig community and the Northwestern region of Colorado. The economies of communities in Northwest Colorado are inextricably tied to the Trapper Mining and ColoWyo mines which produce coal for the coal fired power plant located in Craig, Colorado known as Craig Station. The economies of these communities will be irreparably harmed should Trapper Mining be closed resulting in as much as \$52 million dollars in lost economic activity. There will also be a local, state and federal tax revenue shortfall estimated at more than \$10 million jeopardizing government services in the area.

Trapper Mining has received awards for leadership and stewardship for its operations. Awards include the "Gold Level" Good Neighbor award for community involvement from the federal Office of Surface Mining (OSM), the OSM Bronze Award as one of the best three examples of mine reclamation in the United States out of a field of 1,400 coal mines, and the award for the safest surface coal mine in the United States. This recognition demonstrates Trapper Mining's commitment to its employees, the community at home and abroad.

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Craig Station obtains 50% of its coal from Trapper Mining. This power station provides affordable, reliable electricity to customers in many rural and economically depressed communities. These customers are disproportionately affected by increased electricity rates. Continued elimination of plants like Craig Station furthers the decline of the security of the national power grid. NERC and FERC have both indicated that the security of the nation's electrical grid is in decline and the loss of power plants, like Craig Station, can only serve to exacerbate that situation.

The court's decision in this matter was not based on a violation of any air or water quality laws or regulations. The decision agreed with claims that OSM did not involve the public or take a "hard look" at environmental impacts in its decision to issue the ColoWyo permit in 2007. Yet over the years since the permit was issued, there have been no significant environmental impacts as a result of the mining activity or the burning of the coal in the local power plant. The reality is that there would be greater environmental impacts should Craig Station have to go outside the area for its supply of coal.

It is imperative to the communities in Northwest Colorado that this well run mining operation remain active and its permits be continued unhindered. AGNC members stand ready to provide support in the completion of the EA in a timely fashion and a finding of "No Significant Impact" in the review of the permits for the Trapper Mining coal mine.

Sincerely,



Jeffrey Eskelson, Chairman  
Rio Blanco County



Martin Chazen, Vice-Chairman  
City of Grand Junction