WESTERN ENERGY COMPANY - *Rosebud Mine*
A Subsidiary of WESTMORELAND COAL COMPANY

P.O. BOX 99 • 138 ROSEBUD LANE • COLSTRIP, MT 59323
(406) 748-5100

August 29, 2016

Mr. Chris Yde
Reclamation Program Supervisor
Department of Environmental Quality
Permitting and Compliance Division
P.O. Box 200901
Helena, MT 59620-0901

Permit ID: C2011003F
Revision Type: NA
Permitting Action: Deficiency Response
Subject: Fourth Round Acceptability Deficiency Response

Dear Chris:

Included in this submittal are WECo's response to the Department's deficiency letter date June 27, 2016:

82-4-222(1), MCA: A complete and detailed plan for mining and reclamation includes adequate indexing of materials. Two problems were noted which require changes: 1) Appendix E is identified as "Baseline Vegetation," but also includes the "Wetlands Delineation" report. The title page and table of contents must be changed to reflect what is included in Appendix E or Appendix E should be broken up with proper references made throughout the permit. 2) Pond designs are contained in an undefined folder (22 Pond Designs) which should be renamed to an Appendix. A reference to the pond designs must be included in Appendix J and in Subchapter 3 narrative, page 315-1. The table of contents must be changed to reflect the new pond design appendix.

Western must check the entire permit document for other large indexing deficiencies.

The permit must also include adequate referencing. Page 515-1 must include a reference to Appendix S and page S-1 should include a reference to rule ARM 17.24.515 and ARM 17.24.501(4).

Response:

1) The baseline vegetation report for Area F has been separated and is now two (2) individual reports (Appendix E-1 Area F – 2006 Baseline Vegetation Survey and Appendix E-2 Area F – 2013 Rosebud Mine Wetlands Delineation Report. The table of contents has been updated to reflect the changes.
2) Folder 22 is now Appendix T Pond Designs and As-Builts. The reference to Appendix T was added in 17.24.315(1)(a)(ii), Appendix J, and the Table of Contents has been updated.
3) The permit document has been scanned for indexing, if further issues evolve the reference will be changed as found.
4) Appendix S has been revised to include the reference to ARM 17.24.515 and ARM 17.24.515 has been revised to include a reference to Appendix S.

FC: 620.170

ARM 17.24.302(1): The CAD files that match the pdf of Exhibit O1 Phase I – Area F Haul Road Construction Drawing must be submitted.

Response: Per the Department's comment 17.24.321(1)(c), Exhibit O1 is being removed from the application.

ARM 17.24.304(1)(e): No photos or descriptions of new Ponds 8 and 9 are included in Appendix B, Attachment B-L. Please include these ponds in Attachment B-L similar to Ponds 1-7. Please also submit whatever field and laboratory data are available for these ponds.

Response: Ponds 8 and 9 are now included in Appendix B, Attachment B-L. Field and laboratory data for these ponds are now included in the Attachments of Appendix B.

ARM 17.24.304(1)(e): In Appendix B, Table B-18, the end of the text is cut off for several entries in the "Source Name" and "User" columns. Please correct this formatting issue so that all text is visible.

Response: The formatting issue was corrected in Table B-18.

ARM 17.24.304(1)(e): Please provide the data results from the 2015 aquatic surveys included in Appendix B in MSExcel spreadsheet or compatible format.

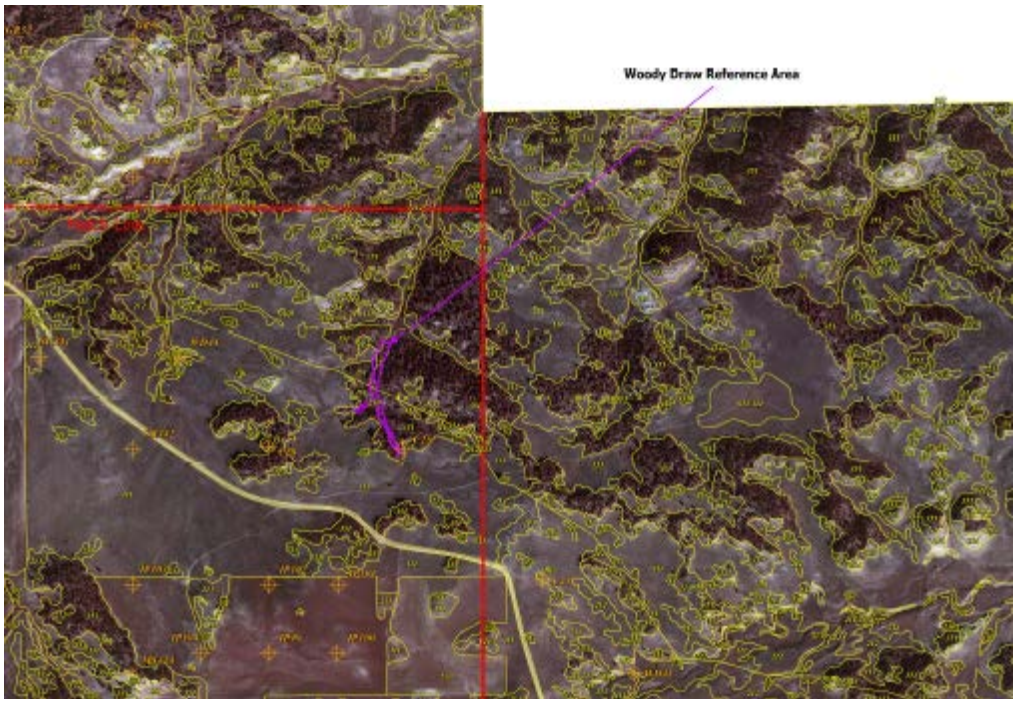
Response: The 2015 aquatic survey is now included in Appendix R. The data from the survey in Excel spreadsheet format is attached to the report in Appendix R.

ARM 17.24.304(1)(e): Tables B-34 and B-35, Appendix B, do not include baseline data for monitored Springs 10 through Spring 14. Please include baseline information for Springs 10 through 14 in these tables.

Response: The tables were revised as specified and available baseline data for Springs 10 through 14 are now included in Appendix B.

ARM 17.24.304 (1)(i)(i): Map 1 is said to include a reference area for Woody Draw community types according to the results section of the Baseline Vegetation Survey. This reference area is not included on the map. Please update Map 1 to include this reference area if it has been established as stated.

Response: After reviewing WECo's submittal for the third deficiency response - the reference area for the Woody Draw community was presented on "Weco Area F Map 1 - NE – 2015". This reference area is still presented on "Weco Area F Map 1 - NE – 2015.pdf" in the fourth round of deficiency responses.



Since there is no documented reference area, there is no defined reclamation standard by which to measure against for phase III bond release. These standards need to be developed, or a reference area must be identified.

This item was not addressed in the previous deficiency response. Cover and production numbers have been established from the reference area baseline data that were collected. Woody Plant Density numbers have not been established. As Woody Draws are considered wildlife habitat, they will need to have a woody plant density standard. Please establish a technical standard for woody plant density on Woody Draw community types.

Response: Please see the information presented below on Woody Plant Density. This information will be submitted as part of the Rosebud Mine Phase III standards also.

- <u>Woody Plant Density</u>

  The proposed standard for Grazing Land woody plant density (200 young and mature woody plants per acre) is intended to match the standard approved for "background areas" at the adjacent Big Sky mine which exhibits nearly identical climate and soils. The proposed standard for Pastureland woody plant density is 0 (zero) given the definition for this land use is that it may occasionally be cut for hay. Having woody plants occasionally occurring in these areas would preclude the ability to "occasionally cut for hay". The proposed standard for wildlife habitat woody plant density is 1,500 young and mature woody plants per acre.

  Areas within the Grazing Land and Pastureland that exhibit higher density of woody vegetation (Wildlife Enhancements) will be grouped into a unique sampling unit, mapped, surveyed, and will be subject to a density standard. The proposed woody plant density standard for wildlife enhancement areas is 1,000 young and mature woody plants per acre. This value matches the approved

standard for "core areas" at the adjacent Big Sky Mine and is the value preferred in discussions with personnel at MDEQ. At these density levels, wildlife enhancement patches can provide sufficient vertical structure for resting, nesting, thermal and escape cover for several species of wildlife while still serving the primary functional land use requirement of forage production. Each Phase III bond relinquishment application shall identify qualifying wildlife enhancement areas and this acreage will be applied to the required total acreage for each permit area.

Trees, shrubs, sub-shrubs, cacti, and succulents that can be included toward the woody plant density standard are discussed below. All trees will be counted. However an evaluation matrix has been developed for this portion of Montana to facilitate isolation of those sub-shrubs (half-shrubs) that have zero or insignificant environmental cover value for wildlife, as opposed to those sub-shrubs and true shrubs that provide some measure of vertical and / or structural habitat value that can be used for either thermal or escape cover. Table 8 resulted from the vast compendium of information and research documented within a U.S. Forest Service database http://www.fs.fed.us/database/feis/plants/. Each individual evaluation is based on research specific to the identified plant species and wildlife classes within the State of Montana unless otherwise noted. Three of the seven half-shrubs and succulents offer virtually zero environmental cover value. These three taxa are: fringed sage (*Artemisia frigida*), brittle prickly pear (*Opuntia fragilis*), and broom snakeweed (*Gutierrezia sarothrae*). In this regard, these three taxa (as well as closely related taxa such as Plains prickly pear – *Opuntia polyacantha*) will not count toward density values. Judgment for exclusion was most conservative and is readily apparent when viewing the table.

Table 8 WECo - Rosebud Mine

Environmental Cover Values for Shrubs, Sub-Shrubs, Cacti, and Succulents commonly found at the Rosebud Mine

Species	Life Form	Wildlife Category - Usefullness of Taxon for Environmental Cover (Thermal and Escape)								Comments	Recommendation (Include with Density Standard)
		Elk	Mule Deer	White-tailed Deer	Pronghorn	Upland Game Birds	Waterfowl	Nongame birds	Small mammals		
Amorpha canescens	Sub-Shrub	**Poor**	**Poor**	**Poor**	**Poor**	**Poor**	**Poor**	**Fair**	**Fair**	Values are for Wyoming	Poor Cover / Structural Value-Sufficient to Include
Artemisia cana	Shrub	*Fair*	**Fair**	**Poor**	**Fair**	**Fair**	**Good**	**Good**	**Good**		Good Cover / Structural Value
Artemisia frigida	Sub-Shrub	**None**	**None**	**None**	**None**	**Poor**	**None**	**Poor**	**Poor**		No - Near Zero Structural Value
Artemisia tridentata	Shrub	**Fair**	**Fair**	**Poor**	**Good**	**Good**	**Good**	**Good**	**Good**	Values are for ssp. *Vaseyana* in Wyoming	Good Cover / Structural Value
Atriplex canescens	Shrub	*Fair*	*Fair*	**Fair**	*Fair*	**Fair**	*Fair*	**Fair**	**Fair**		Reasonable Cover / Structural Value
Atriplex gardneri	Sub-Shrub	**Poor**	**Poor**	*Poor*	**Poor**	**Fair**	**Poor**	**Fair**	**Fair**	Values are for Utah	Poor Cover / Structural Value-Sufficient to Include
Ceratoides lanata	Sub-Shrub	*Poor*	*Poor*	*Poor*	*Poor*	**Good**	*Fair*	*Fair*	**Fair**		Reasonable Cover / Structural Value
Crataegus succulenta	Shrub	**Fair**	**Good**	**Good**	**Poor**	**Good**	**Poor**	**Good**	**Good**	Similar species used: *Craetegus douglasii* in Wyo.	Good Cover / Structural Value
Gutierrezia sarothrae	Sub-Shrub	**Poor**	**None**	**None**	**None**	**None**	**None**	**None**	**Poor**	Tends to cycle with precip.	No - Near Zero Structural Value
Opuntia fragilis	Succ-ulent	**None**	**None**	**None**	**None**	**None**	**None**	**Poor**	**Poor**		No - Near Zero Structural Value
Prunus americana	Shrub	*Fair*	*Good*	*Good*	*Fair*	*Good*	*Good*	*Good*	*Good*		Good Cover / Structural Value
Prunus virginiana	Shrub	**Fair**	**Good**	**Good**	**Fair**	**Good**	*Good*	**Good**	**Good**		Good Cover / Structural Value
Rhus trilobata	Shrub	*Fair*	*Fair*	*Good*	*Good*	*Good*	*Good*	**Good**	**Good**	Similar species used: *Rhus aromatica*	Good Cover / Structural Value
Rosa arkansana	Shrub	*Poor*	*Poor*	**Good**	*Poor*	**Fair**	*Fair*	**Fair**	**Fair**		Reasonable Cover / Structural Value
Shepherdia argentea	Shrub	**Good**	**Good**	**Good**	*Good*	**Good**	*Good*	**Good**	**Fair**		Good Cover / Structural Value
Symphoricarpos occidentalis	Shrub	**Poor**	**Fair**	**Good**	**Fair**	**Good**	**Good**	**Good**	**Good**		Good Cover / Structural Value
Yucca glauca	Succ-ulent	*Poor*	**Poor**	*Poor*	**Poor**	**Poor**	*Fair*	**Fair**	**Fair**		Fair Cover / Structural Value-Sufficient to Include

Bold Type indicates values obtained from Forest Service database website: ***http://www.fs.fed.us/database/feis/plants/***
Non-bold italics indicates values based on professional judgement by Cedar Creek Wildlife Ecologists

ARM 17.24.305(1)(w): Culverts C-1 thru C-6 depicted on the Exhibit O, Haul Road, must also be depicted on the Exhibit D, Hydrologic Control Plan.

Response: Culverts C-1 thru C-6 have been depicted on Exhibit D.

ARM 17.24.312(1)(d): The wetland mitigation plan only discusses impacts to Wetlands B and C in the context of haul road impacts. However, the PHC and submitted mine plan indicate that portions of these wetlands will be mined through, including supply springs. Further, the PHC also includes Wetlands D, E, F-081, F, and F028 as potentially impacted by mining or roads. Any wetland assessment and mitigation plan should include all potentially impacted wetlands. As part of permit acceptability, a final wetland mitigation plan should be submitted and approved. The final wetland mitigation plan should include measures to restore or avoid disturbance to wetlands per 17.24.751(2)(f), including on-site mitigations such as wetland restoration, creation, or enhancement. If on-site mitigation is unfeasible, particularly in the case of Wetlands B and C, off- site mitigation (e.g. other mine areas) may be necessary.

Response: Please see Appendix N-1. The mitigation plan has been revised to include wetland requested above. Also the language in the text has been aligned demonstrating the process of determining the need for replacement or mitigation of the wetlands. Once the need is determined, WECo will work with the Department on the final mitigation plan. With that said, concurrence on the process in Appendix N-1 is necessary as soon as possible to move forward.

ARM 17.24.313(1): Please submit field survey data for all measured channel cross-sections in Exhibit J-1. Data must be in MSExcel or a format that will allow DEQ to recreate and conduct numeric analysis on these cross-sections. CAD data is not sufficient.

Response: Please see the folder Appendix J - Exhibit J-1 PROFILES – csv for the Excel spreadsheets (Folder 23). Please note there are many folders and spreadsheets; each drainage has an individual folder and each cross-section has its own separate file.

ARM 17.24.313(1): Please submit all data tables J-1 through J-6 in MSExcel or compatible format.

Response: The Excel files have been included in Folder 23 Electronic Deliverables folder – Appendix J PHB Spreadsheets. Per previous deficiencies to Area B-MR76 Table J-6 has been removed as the comparison it provided was irrelevant and Table J-5 has been revised to improve readability. Tables J-1 through J-5 and J-9 through J-10 have been updated.

ARM 17.24.313(1): Table 313-9. It is not understood how cross section data from Appendix J were used to create Table 313-9. How were individual cross-sections evaluated for the flow-recurrence intervals presented in the first column? Maximum channel depths appear to be very large, and not representative of actual channel depth in ephemeral drainages (i.e. channel depth of 22ft implies that this depth is the 'active' channel depth) for the purposes of hydrogeomorphic analysis. For each cross section location, please provide a table of 1) watershed area above cross-section, 2) slope of the channel segment 3) floodplain or valley-bottom width at cross section. Please discuss this reclamation approach with DEQ hydrologists.

Response: This section of the permit has been updated to use the surveyed cross sections for postmine reclamation. Table 313-9 has been renamed to Table 313-8 with the deletion of the previous Table 313-8. Changes show the characteristics of the premine channel cross sections that will be used in postmine drainage design.

ARM 17.24.313(1): Exhibit B and Exhibit B1 include line features labeled "Additional Drainage Feature" in the legend. No explanation of these features could be located in the permit. Please provide an explanation of these map features.

Response: WECo has committed to adding more diversity into the Approximate Postmine Topography in ARM 17.24.501(4)(c). "These features will increase the resemblance to the general pre-mine surface configuration; they will blend in a way that will compliment the surrounding landscape and terrain. All of the features will compliment postmine reclamation diversity for wildlife and vegetation, furthering the overall ecological function for the intended postmine land use. These features will provide the micro-, meso-, and large scale topographic diversity necessary for establishing a wide variety of ecological niches and increased odds for success." These additional drainage features will be constructed in the general location of the symbols shown on Exhibit B. Location of the features may shift to allow incorporation of variations in the disturbed surface. Also a notation next to the "Additional Drainage Feature" on the legend has been added to direct the reviewer to 17.24.501(4)(c) and reference to 17.24.501(4)(c) has been added to the language in 17.24.313(1)(d)(iv).

ARM 17.24.313(1)(c): The initial bond calculation was submitted with the February 2016 response to deficiencies. The following deficiencies must be adequately addressed.

1. There are 24,700,459 lcy of truck backfill listed on Page G-3: it appears that this is an error and should be 2,470,046 lcy.

2. The derivation of the push and haul distances used on pages G-3 (backfilling/grading) and G-7 (soils) must be provided in the form of tables. These tables summarize and weight average the block to block information depicted on corresponding maps.

Response:

1. Please see page G-3 of Exhibit G. The truck backfill lcy was adjusted to 2,470,046 lcy.
2. Please see Exhibit G C2011003F Reclamation Bond Calculation 2016-07. Two additional spreadsheets have been provided as the support information for Equipment Hours_Costs – Area F.xlsx (pertaining to page G-3) and Soils Distribution_final.xlsx (pertaining to page G-7).

ARM 17.24.313(1)(d)(iv) and 501(4): Exhibit B and B1 appear to present a postmine topography that meets the performance standards. Additional support for this finding is found in Exhibit T1 and Exhibit T2; however, the table in Exhibit T1 depicts some erroneous information in the "Percent of Total" column (20 to 25 percent range). The 4.73% and 4.49% reported should be closer to 13%. The actual numbers must be included in the table.

Response: Please see Exhibit T1 Premine and Postmine Slope Histogram. The table and the graph have been updated with the correct information.

ARM 17.24.313(1)(g)(ii) and (iii): The soil balance in the soil survey Appendix G, Table 1. Pre-mine Acreages, Salvage Depths, and Volumes for Area F, indicate less than 1 foot each of topsoil and subsoil will be salvaged during the project. The balance shows 0.77ft (9.2 in) and 0.78ft (9.4 in) of material salvaged over the projected 6,743 acres. This is not consistent with the designated 1 foot topsoil and 1 foot subsoil salvage plan. This is due to a third lift designation in Table 1. The third lift material volume is 1.55 feet of material over the disturbance acreage and must be part of the salvage volume. The third lift materials would mostly fall into the tree soils category and should be indicated as tree soil.

Please change the lift three category in "Table 1. Pre-mine Acreages, Salvage Depths, and Volumes for Area F" (appendix G). Soil in the lift three category will be designated tree soil.

Response: The heading "Lift 3" was in Appendix G, Table 1 was changed to "Tree Soil" for consistency with Section 313.

Appendix G

DEQ is in agreement that the selenium levels are not usual for the region. The testing plan for verification is an acceptable approach to check validity of the original. If in fact the original data are wrong this will be proven prior to accepting the soil handling plan.

If the original data are correct, and in fact selenium is elevated, the permit language will have to be rewritten to address the high selenium values. Whether the new language is a plan to ameliorate the selenium, or a demonstration that selenium is not a problem the demonstration must be complete before the soils handling plan is acceptable.

Response: Appendix G has been edited to include the results of soil selenium verification testing as presented in Addendum A. Attachment A1 presents the official laboratory reports attending Addendum A.

ARM17.24.313(1)(h)(iv): The narrative for this rule subsection states that reclamation will be in compliance with ARM 17.24.716(5). This rule does not exist. Please add language to this section indicating how the reclamation plan will be consistent with the requirements of this subsection, "introduced species to be used, if any, and documentation of the desirability and necessity of using the introduced species to achieve the approved post mining land use."

Response: Please see the attached ARM 17.24.313(1)(h)(iv). The outdated language in this rule has been revised.

ARM 17.24.314(2): GIS layers submitted in Appendix O do not match those layers submitted in CAD. It appears that some of the Appendix O layers were from past submittals. The most recent submittal has adjusted CAD layers that presumably were not updated in Appendix O (i.e. stockpile layers, for one). Please update all GIS or CAD layers with the most recent mine plan layers.

Response: Figure O-4 was revised to depict the latest mine plan.

ARM 17.24.314(2): Narrative in Appendix J, Page 3, states that, "*As the water will attain all effluent standards required in the MPDES permit, the discharge produces water suitable for downstream use by wildlife, livestock, and native vegetation.*" No MPDES effluent limitations information regarding MPDES permit limits are provided in the application. MPDES effluent limitations for coal mining discharge permits typically include TSS, Total Settleable Solids, Iron, and Oil and Grease, while pit water pumped to sediment ponds may have high levels of sulfate, sodium, conductivity and/or other constituents not regulated by MPDES permits. Please describe and present an evaluation of the anticipated quality of pit-pumped water, the requirements for water suitability for wildlife, livestock and vegetation, and how pit-pumped water compares to these requirements. If this analysis is provided elsewhere, please reference and summarize that analysis in Appendix J.

Response: Additional narrative referencing the discussion of MPDES permits in the PHC (Appendix O) was added to the report. Additional evaluation and discussion of the water quality of MPDES discharges was added to the PHC (Appendix O).

ARM 17.24.314(2)(a): Exhibit D, Hydro Control Plan

a. Exhibit D must show any planned ditches for routing water (haul and access road ditches). All drainage structures must be connected in a network to ponds, traps, sumps, etc.
b. Exhibit D must show the drainage areas for all sediment ponds and traps (i.e. delineate the entire area that drains to each individual pond on the drainage control map). Pond drainage areas must be submitted in CAD with Exhibit D.
c. Where culverts are used, permittee must demonstrate that they meet requirements of ARM 17.24.605. The legend should have a separate feature for culvert and a different feature for low water crossing. According to ARM 17.24.321(2) the plans for low-water crossings must be certified by a qualified licensed professional engineer. Please correct the legend of the Exhibit D Hydrologic Control Plan and submit the certified designs for all low water crossings for review.
d. Ponds F-4 and F-5 appear to be located on or very near burn zone/clinker. These ponds should be located in areas where infiltration to shallow groundwater is limited, or should be lined to prevent losses to clinker and to adjacent alluvium of Black Hank Creek.
e. No proposed MPDES locations are shown on the Exhibit D. Likewise, Table J-9 does not include associated MPDES information. Please update Exhibit D and Table J-9 to include proposed MPDES locations and relevant table references.

Response:

a. Exhibit D has been updated to show all ditches.
b. Exhibit D has been updated to show all pond and trap drainage boundaries.
c. Exhibit D has been updated to show culvert and low water crossings. Permit section 605 has been updated to include culvert and low water crossing design that has been certified by a professional engineer.
d. Exhibit D has been updated to show the new locations of Ponds F-4 and F-5. New designs for Ponds F-2 through F-30 are included with this submittal. Pond F-1 has been replaced with a trap so it is no longer necessary. Please replace the entire set of pond designs (Ponds F-1 through F-30) that were submitted with the previous deficiency response with the designs included in this submittal.
e. Exhibit D and Table J-9 have been updated to include proposed MPDES outfall locations.

ARM 17.24.314(2)(d): Appendix P, Please remove the MQAP from the Area F permit and provide a reference to the Area B permit.

Response: As agreed upon on July 19, 2016; WECo feels it would be practical to leave the Area F MQAP in the permit application. Once the application is approved, WECo will incorporate the Area F information into the Rosebud Mine MQAP.

The MQAP was revised to address DEQ comments received via email. In addition, the pond level measurement protocol using a reference stake and rating tables were added. The reporting limit for cadmium was changed as described in IML letter attached to the Area F MQAP report. Finally, the description of active pond, spring and surface water sites was updated with data through June 2016.

ARM 17.24.314(2)(d): (received by email) The surface water site to be installed on Donley Creek downstream from SW-90 is referred to by two different names in the MQAP (Appendix P). Section

2.2.1 on page 5 refers to SW-200 while Appendix P-B, Section 3.2.1 on page 18, and Table P-1 and Figure P-1 refer to SW-88. Please clarify what is the correct name for this new surface water site.

Response: The surface water site to be installed on Donley Creek is now consistently named SW-200 and the MQAP was updated accordingly.

ARM 17.24.314(2)(d): (received by email) While the updated monitoring plan presented in Appendix P (MQAP) meets many of the objectives present in Section 2.1, there is a lack of monitoring in several key areas.

Section 2.2.1 Stream Monitoring Design:

The MQAP text refers to SW-200, which will be located downstream of SW-90 on Donley Creek; however, Figure P-1 and Table P-1 label this monitoring location as SW-88. Please update the text to reflect the figure and table labeling.

Not all of the updated stream monitoring locations are located downstream of all mining impacts. The provisional locations of SW-88 (or SW-200) on Donley Creek and CG-103 on Black Hank Creek are too far upstream to capture impacts from mined drainages (pre-mine drainage 158/post mine drainage 139 and pre-mine drainage 508/post mine drainage 517). Ideal locations would be near the county road, using road crossings if necessary for stable, defined channel locations. In addition, not all significant incoming drainages are monitored for background conditions. The southern fork (2,489 acres) of Donley Creek is a significant drainage larger than the currently monitored northern fork (1,370 acres). A crest gage should be added on the southern fork of Donley Creek entering the permit area, which would provide further data on surface water quality and quantity entering the permit area.

Response: As requested, the provisional location of crest gauge CG-103 was moved to a more downstream location and relabeled CG-105. The CG-105 location is immediately downstream from the proposed relocated county road and downstream from Pond 4. In addition, a crest gauge location, CG-106, was added on the southern fork of Donley Creek upstream from mining disturbance.

ARM 17.24.314(3): Appendix J, Page 3, states that "*Mining cuts adjacent to alluvium will temporarily reduce groundwater flow from bedrock units to the alluvium. However, this reduction in recharge to the alluvium will have only a small effect on downstream alluvial flows.*" Please describe and present a numeric evaluation of the alluvial depletions expected, and their expected contribution to downstream alluvial flows. If this analysis is provided elsewhere, please reference and summarize that analysis in Appendix J.

Response: Additional text referencing the applicable discussion in the PHC (Appendix O) and Groundwater Model Report (Appendix I-B) was added to the report.

ARM 17.24.314(3): Table J-5 appears to compare two very different flow calculation methodologies. One method (SCS) estimates the peak flow result from a specific precipitation (i.e. 2yr/24hour) event upon a watershed, and the other method estimates peak flows from a regression equation derived from observed flood recurrence intervals. The flow calculated from a 2yr/24hr precipitation event is not the same concept as a 2-yr flood recurrence flow and do not

lend themselves to meaningful comparison. Please revise and/or remove this comparative analysis.

Response: Revised Tables J-1 through J-5 have been included in Appendix J.

ARM 17.24.314(3): Appendix O does not do an adequate job of evaluating surface flow losses during active mining. Hydrologic modeling efforts provide numerical runoff estimates. Please use modeled surface flows to enumerate and estimate peak flow reductions and surface flow losses to Robbie Creek, Donley Creek, Black Hank Creek, McClure Creek, and Trail Creek due to runoff impoundment or flow losses from mining operations.

Response: Appendix O has been revised to provide an expanded evaluation of impacts to surface water quantity.

ARM 17.24.314(3): Appendix O, Pg 14, states that "statistically significant correlations of changes in surface water quality to mining have not been observed to date." DEQ does not understand this statement. There has been no mining in Area F yet. If this refers to other areas mined previously, please reference the analysis conducted that reaches this conclusion, and its relevance to Area F.

Response: The text has been revised to state that this applies to other Rosebud permit areas.

ARM 17.24.314(3): Appendix O, Pg 14, states that "The sediment control plan will demonstrate that modeled postmine sediment yields will be less than premine yields." How will this be done? Please reference the plan and analysis method that demonstrates this.

Response: Additional narrative was added to address this comment.

ARM 17.24.314(3): Appendix O, Pg 11, states that "surface flows will be augmented by discharges from sediment ponds", seemingly to offset surface runoff detainment (as referenced in the previous sentence). DEQ does not understand how surface flows will be augmented by retention and discharge of runoff flows. Per previous comment, please provide a numerical analysis of how retention of surface water flows will affect stream flows in East Fork Armells Creek.

Response: This text has been revised to expand the evaluation of impacts to surface water quantity.

ARM 17.24.314(3): Appendix O, Pg 13, states that retention of water will result in a "net improvement of downstream water quality during mining". DEQ does not agree that the loss of natural levels of suspended sediment results is an improvement in water quality. Please discuss changes in water quality expected within the context of 'gains' or 'losses' rather than value judgements. Are there other water quality constituents that are expected to change as a result of the retention and release of water? Please also consider this comment when discussing purported 'elevated' levels of any constituent (i.e. "…naturally occurring elevated suspended solids…").

Response: The text has been revised consistent with this comment.

ARM 17.24.314(3): Appendix O, Section 3.3. Aquatic Life, cites the Area F Aquatic Life Survey and states that aquatic organisms identified in the survey are indicative of poor water quality,

and cites cattle use and seasonal or intermittent conditions as the probable cause of the poor water quality indicators. It is then concluded that increases in TDS are not expected to significantly change the presence or composition of aquatic life. The conclusion of poor water quality given in the Aquatic Life Survey is based on the Hilsenhoff Index of Biological Integrity (HIBI), which is an indicator of low oxygen levels (typically from nutrient-related stressors) and hence poor water quality. The HIBI is not known to be sensitive to, or an indicator of dissolved solids conditions. It is DEQ's understanding that, while aquatic communities appear to be impacted by livestock use, and may be naturally limited due to seasonal water supply conditions, statements regarding the aquatic community's response to increases in dissolved solids is conjecture. Please review and revise statements regarding aquatic response to mining sub-McKay sands yield sufficient water for livestock and domestic use." Please include or reference an analysis that assesses and evaluates the suitability of water quality and quantity in these units for both livestock and domestic use.

Response: The Section 3.3 of Appendix O was revised to address this comment.

ARM 17.24.314(3): In Appendix O, Section 3.1.2, page 13, states: "The result is a net improvement of downstream water quality during mining." Reduction of the concentrations of any parameter below natural levels does not qualify as improvement of water quality. Please reword this statement to state: "The result is a net reduction in suspended sediment concentrations during mining."

Response: Please see Appendix O, the text has been revised per the Department's comments.

ARM 17.24.314(3): In Appendix O, Section 3.1.2, page 14, contains a paragraph which discusses alluvial groundwater quality in East Fork Armells Creek. This paragraph is not relevant to surface water in Area F. Please remove this paragraph.

Response: The paragraph was removed.

ARM 17.24.314(3): In Appendix O, Section 3.2.2, pages 21 and 22, there is a discussion of potential for changes in groundwater class. Because groundwater classes are defined by "natural specific conductance," they cannot be changed by activities of man. Please rewrite this section to avoid referring to changes in groundwater class. Evaluations of the probable hydrologic consequences of changes in SC should be made based on the listed beneficial uses in ARM 17.30.1006 for the baseline groundwater classes.

Response: In response to this comment, Appendix B (Hydrology) has been revised to provide a characterization of the premine groundwater classifications. Appendix O has been revised to evaluate impacts to groundwater beneficial uses.

ARM 17.24.314(3): In Appendix O, Section 3.3.1, page 24, it is stated there is significant potential that Springs 7, 10, and 11 will be affected by mining. Due to the location of these springs, there is near certainty that all flow from these springs will cease during adjacent mining. Please modify permit language to reflect this most probable outcome.

Response: The narrative in Appendix O, Section 3.3.1 was revised to address this comment.

ARM 17.24.314(3): In Appendix O, Section 3.3.1, page 25, it is stated Spring 13 is sourced from the McKay coal. As this spring is located approximately 0.7 miles upgradient from the McKay coal outcrop this is unlikely. Please correct the source unit listed for this spring.

Response: The McKay coal outcrop in Figure O-5 was relabeled 'coal outcrop' as it is actually a composite of several coal outcrop data (not just the McKay coal). The likely source of Spring 13 was derived from analysis of nearby drilling logs and is believed to be correct.

ARM 17.24.314(3): In Appendix O, Section 3.3.1, pages 24 and 25, there is no discussion of the long term potential for re-emergence of flow at springs which could be affected by mining, or potential changes in water quality at springs downgradient from the spoil. In particular, Springs 7, 10, and 11 produce water of lower conductivity than other springs in the area. If flow at these springs resumes after mining, it is highly unlikely that similar water quality will be present due to the proximity of spoil. Please include a more detailed discussion of the long term impacts to springs.

Response: The narrative in Appendix O, Section 3.3.1 was revised to address this comment.

ARM 17.24.314(3): Appendix O, Table O-5, contains several incorrect references to Section 4.1. Due to the renumbering of sections, DEQ believes these references should cite Section 3.3 instead.

Response: Table O-5 has been revised to reference Appendix B.

ARM 17.24.314(3): In Appendix O, Section 5.0, is pending a decision on alluvial valley floors. This section must be completed before final review of the PHC can be completed.

Response: Appendix O has been revised to state that DEQ has determined that no AVFs are present at or near Area F.

ARM 17.24.314(3): In Appendix I-B, Section 2.3, on page 14, the narrative states the maximum extents of the five foot drawdown in the Rosebud coal during mining contour occurs in 2034, as displayed in Figure I-5. While this is true for most of the area, in T2N R38E S25 and S26 the furthest extent of the five foot drawdown contour occurs in 2030. Please revise this section to include this variability in the timing of the maximum extents of drawdown.

Response: The narrative in Appendix I-B, Section 2.3 was revised to address this comment. Section labels are now included in Appendix I-B, Figure I-2.

ARM 17.24.314(3): Evaluation of the model datasets provided for the Area F model (Appendix I-B), indicates that the lack of drawdown from the majority of mining conducted between Robbie and Donley creeks is due to mine pit drain elevations which are set above the simulated premine steady state water levels in the Rosebud coal. Geologic structure in this area results in higher elevations for the base of the coal in this area than in adjacent areas, which are not simulated by the quasi-3D modeling approach used in the Rosebud model, thus steady state premine water levels in the Rosebud coal are simulated below the bottom of the Rosebud coal. The quasi-3D modeling approach relies on an assumption of confined groundwater conditions, which may be less applicable to the Rosebud coal in Area F compared to the other mine areas. As a result of the limitations of the modeling method and the drain elevations used to simulate mine pit dewatering, the model simulates continued hydrologic connection and flow occurring in the Rosebud coal through the mine pit during mining in this area. There is no simple solution to correct this

inaccuracy. Model parameters could be locally altered to maintain higher water levels in this area, or mine pit drain elevations could be lowered to below the simulated water levels. While some balancing of over- and under-prediction is inherent to modeling, overall, calibration of the Rosebud model is less accurate in Area F than in other mine areas. Calibration in the Rosebud coal (model layer 2) in this area could potentially be improved by reducing the recharge in Zone G and extending transmissivity/leakance Zone B northward along the ridge west of Area F. While these changes would likely result in greater underprediction in model layer 4 and 5, this may be able to be balanced by also extending transmissivity/leakance Zone K into the same area as Zone B. If this model inaccuracy cannot be corrected, detailed explanations of the cause of the inaccuracy and its implications on the head, drawdown, and flux predictions of the model must be included in Appendix I-B and Appendix O.

Response: The DEQ asserts that the model is inaccurate for Area F. The calibration results for Area F when evaluated on their own merits are reasonable (see information below). The calibration statistics for Area F are relatively "less accurate" for Area F compared to most other portions of the model domain simply because there is greater variance in water levels both vertically and laterally in the vicinity of Area F compared to most other portions of the Rosebud Mine model domain. One factor causing this variability is that several drainages (multiple sinks) dissect Area F. Note that a majority of the Rosebud coal observations for the remainder of the Rosebud Mine are within one drainage, East Fork Armells Creek.

Steady-State Calibration Statistics by Layers of Interest Within Area F

Statistic	Layer 1 - OB	Layer 2 - RBC	Layer 4 - McK C
Residual Mean	-0.98	0.20	-0.74
Absolute Residual Mean	10.56	10.23	13.72
Residual Std. Deviation	12.25	12.46	15.26
Sum of Squares	1056.6	1087.0	2099.9
RMS Error	12.29	12.46	15.27
Min. Residual	-18.31	-18.04	-23.02
Max. Residual	19.56	22.78	20.44
Number of Observations	7	7	9

The mine pit drain elevations were set at the surveyed base of the Rosebud Coal as defined by WECo. The calibration is not affected by the relatively higher elevation of the base of the Rosebud coal in Area F compared to other portions of the mine as was suggested by DEQ. The slightly higher absolute residual mean, again, is purely a matter of greater observation variability over space compared to most (but not all) other areas in the Rosebud Mine model vicinity.

The "quasi-3D" model and what is coined by some as "true-3D" model each have their limitations. For instance, if similar parameter zonation was employed for a "true-3D" method, it would likely lead to similar PEST calibration results, which in turn are similar to those obtained via the "quasi-3D" model. This would occur in order to balance over-predicting and under-predicting observations in Area F. The "true-3D" model would likely lead to dry cells where no flow would be simulated. In effect, as it pertains to the local area of interest, it could be argued that the dry cell problem is a more serious issue as it simulates no flow where it is likely that some flow (seepage) is present. In a perfect world where an exact replication (simulations match observations) is attained via the calibration process (never happens), and there is very good knowledge of geologic structures 3-dimensionally over space (vertical and lateral) [very rare], then the "true-3D" representation may be the better of the two.

In the real world, each method out of necessity represents a mathematical simplification of a very complex hydrogeologic system.

The suggestions made by DEQ for model parameterization will be unsuccessful in meeting its objective of raising water levels in the area of interest. None would cause the simulated water level to rise in that area. The changes would also lead to calibration issues/problems in other parts of the model domain. For instance, reducing the recharge in Zone G would cause serious under-predictions in portions of the model domain northeast of that zone.

Another key reason that the suggestions would be unsuccessful in raising the simulated head in the local area of interest is that the model simulation has assumed a uniform hydraulic conductivity and leakance of the Rosebud coal throughout the model domain. There are two targets out of 63 targets in model layer 2 (mainly the Rosebud Coal) that would need to be altered (raised) substantially. Simply put, the two wells in that local area would not have much leverage in the PEST calibration effort as a whole for the Rosebud coal. In order to raise the simulated groundwater levels in the area of interest, it would be necessary to establish a separate zone(s) within that specific area. The "raise" could be accomplished by adding a new local recharge zone with a higher recharge rate (probably not geologically justifiable). It could also be done by creating a local zone possessing a significant reduction in vertical leakance of the Rosebud coal (probably not geologically justifiable).

Given the limitations in representing the local area of interest, the best option at this stage of the overall evaluation process is to simply state the following in the model report:

> "All groundwater models developed for highly complex systems, such as the Rosebud Mine model, have localized calibration issues that are not always easily solved in the model calibration process. This in large part is associated with unquantifiable or unknown geological/hydrologic complexities, heterogeneity, etc. that affect local or specific observations (e.g., water levels). This is the case for an area between Robbie Creek and Donley Creek where the model does under-predict water levels for the Rosebud coal. Yet, there are other areas in the model domain where the model over-predicts water levels, e.g., the area west of Robbie Creek. "
>
> "Given the manner of the mining process, some caution is warranted in assuming that each year-specific discharge defined in Table I-2 will reflect the actual amount of drain flow (seepage) that results from that year of mining simply because of differences between observed and simulated water levels. Perhaps a more representative reflection of the actual flow (seepage) that will accrue over time is to use the cumulative average discharge shown in Table I-2 (last column), as opposed to relying on instantaneous (yearly) estimates, which, can in some instances, be affected by localized calibration error. Finally, the simulated rates given in this table will be difficult, if not impossible, to discern or observe physically at the mine since they are spread over a distance of a few thousand feet or more."

In addition, qualifying language was added to the text to discuss the implications of the "goodness-of-fit" to the transient water balance simulation/drawdown results in Sections 2.2 and 2.3.

ARM 17.24.315: Western's February 29, 2016 changes to Exhibit D and Table J-10 did not adequately address the conflicting information in the first paragraph, page 14, Appendix J. The

disturbed drainage area above Traps 2, 4, 9, 15, 17, 18, 19, 20, 23, and 24 are all larger than the 10 acre commitment on page 14. The 10 acre limit must be changed to 40 acres as accounted for in Attachment J-A, Standard Trap Design or designed ponds must be approved and installed below all of the before mentioned traps.

Response: Appendix J has been revised per this comment.

ARM 17.24.321(1)(c): Western's response did not completely address this deficiency. Revised Exhibit O and the submittal of an Exhibit O1 did not change the orientation of culverts F-HR-2 and F-HR-8. It is likely that a diversion of the native channels will need to be constructed to align the drainage with the culverts. There may also be an issue with culvert F-HR-1 if Pond 2 outlets into the native drainage. While it may be acceptable to change the orientation of culverts HR-2 and HR- 8 in the field during installation, it may not be acceptable to build a diversion to align the channel with the designed culvert location without approval pursuant to ARM 17.24.317 and 17.24.635.

Exhibit O1 presents more detail than is required in the permit and should be removed unless Western plans to implement all aspects of the exhibit.

Response: The drainage channel near culvert F-HR-1 was incorrectly drawn in previous submittal. Please see updated channel included in this submittal. This change negates the requirement for a diversion as the channel flows directly into the culvert F-HR-1. For culverts F-HR-2 and F-HR-8, if the orientation of the culverts in the field cannot accommodate this deficiency then a design for a diversion will be submitted prior to construction. Exhibit O1 has been removed from the permit application.

ARM 17.24.321(1) and 314(1): F4 ramp crosses Donely Creek between two mining areas. There are close to four square miles of drainage area above this crossing. The revised Exhibit D depicts an un-designed culvert and low water crossing. While this may be acceptable in practice, an appropriate description of the crossing must be included in the application. The description must include: 1) A profile of the ramp depicting its relation to native topography with an exit and entrance from each mine area and coal removal locations. 2) Up and down gradient profiles of the undisturbed and disturbed portions of Donley Creek. 3) All appropriate hydraulics for the 10-yr, 24-hr event. 3) All appropriate design criteria and flow data for whatever structures are used to construct the crossing.

Response: The design for C&L-11 and all culvert and low water crossings is included in section 17.24.605 of the permit.

ARM 17.24.321(3), 301(108), and 601(8): The narrative reference on page 321-3 to submit haul road "as-builts … with the Annual Report" must be revised. The as-built must be submitted within 6 months of the road being used for transport of coal, soil or spoil.

Response: Please see ARM 17.24.321(3). Language has been revised to reflect the requested changes.

ARM 17.24.321(3): The plans and drawings for Exhibit 01- Phase I Area F Haul Road must be certified by a qualified licensed professional engineer.

Response: Per the Department's comment 17.24.321(1)(c), Exhibit O1 is being removed from the application.

ARM 17.24.606(6): Culverts must be constructed to avoid plugging or collapse and erosion at inlet and outlets. The operator must submit a typical culvert cross section that includes installation details that demonstrated that the culverts will be constructed to avoid plugging and erosion at the inlet and outlets. An example of an acceptable typical culvert installation detail is depicted below.

Response: Please see Figure 605-1 and Figure 605-2. Typical Culvert Cross-Section located in ARM 17.24.605. Please note – ARM 17.24.606 has been repealed.

ARM 17.24.634(1)(i) The postmine stream channel that is highlighted below was not removed from Exhibit B Post Mine Topography Map. This stream channel does not exhibit characteristics that will blend with the undisturbed drainage system below the area to be reclaimed.

Response: Please see Exhibit B Approximate Postmine Topography. The stream channel has been removed.

ARM 17.24.723(1): Small mammals are included in the Wildlife Monitoring Plan. A study was conducted on reclamation that allows for mines to no longer study small mammals on reclamation. Please remove the "Small Mammals" portion of the Wildlife Monitoring Plan.

Response: Please see ARM 17.24.723. The "small mammals" portion of the wildlife monitoring plan has been removed.

ARM 17.24.723(1): The Revegetation Monitoring Plan for phases I and II is much more in-depth than is required by the rules. MT DEQ Annual Mining Report Standard defines the extent of vegetation monitoring that is required. That text is included here:

"Vegetation monitoring must be conducted on every revegetated field using the Periodic Revegetation Monitoring Form. Each field must be monitored every year after initial seeding or planting until Phase II bond release has been achieved, and at a minimum every third year after Phase II bond release. The initial monitoring assessment must occur either the same calendar year the field was initially seeded or the following calendar year. The form must be completed by a qualified professional.

IMPORTANT NOTE: Periodic vegetation monitoring is meant to serve as a qualitative assessment of how each reclamation field is performing…"

The qualitative approach described is more than sufficient for phase I and II bond release.

Phase III bond release sampling will be compliant with ARM 17.24.726.

Please update the revegetation monitoring plan to reflect this language.

Response: Please see ARM 17.24.723 page 723-3. The revegetation monitoring plan has been updated to include the revised language as requested.

ARM 17.24.726: This rule has been updated since the original application was submitted. Sections 3, 4, 5, and 6 need to reflect this change. Please update permit material for this rule to match current ARM's.

Response: ARM 17.24.726 has been updated to reflect to current rule. Please see the enclosed 17.24.726.

WECo is working diligently to produce a quality product, if you have any questions or you find something amiss, please contact me at (406) 748-5124.

Sincerely,

Dicki Peterson

Dicki Peterson
Permit Coordinator
Western Energy Company
Rosebud Mine – Area F
Phone: (406) 748-5124
Fax: (406) 748-5202
dpeterson@westmoreland.com

Enclosures: C2011003F Deficiency Response #4 2016-08

cc: Rusty Batie

Gilbert, Sharona

From: Peterson, Dicki L. <DPeterson@westmoreland.com>
Sent: Monday, August 29, 2016 2:26 PM
To: DEQCoal
Subject: C2011003F Deficiency Response #4
Attachments: C2011003F Deficiency Response #4 2016-08 NO ATTACHMENTS.pdf

Sharona –

I am uploading the Area F deficiencies to the file transfer service. I had to breakdown the submittal. All together the submittal is 3.6 GB. Without the electronic deliverables and AutoCAD drawings the file is 1.7 GB. The file transfer service does not like that size either.

Sorry,

Dicki Peterson
Permit Coordinator
Western Energy Company / Westmoreland Savage Corporation
dpeterson@westmoreland.com
406/748-5124

Gilbert, Sharona

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SENT FROM:	Dicki Peterson
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Subject: State of Montana File Transfer Service

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STATE OF MONTANA

The following file has been sent to you through the State of Montana File Transfer Service:

FILE NAME:	08 Appendix F.pdf
SENT FROM:	Dicki Peterson
MESSAGE:	Submittal #3 Includes folder 07 Appendix E, 08 Appendix F, 09 Appendix G, and 10 Appendix H. Dicki Peterson Permit Coordinator Western Energy Company / Westmoreland Savage Corporation dpeterson@westmoreland.com 406/748-5124

To download this file, click on the link below:

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Gilbert, Sharona

From: File Transfer Service <TransferService@MT.gov>
Sent: Monday, August 29, 2016 3:10 PM
To: DEQCoal
Subject: State of Montana File Transfer Service

FILE TRANSFER SERVICE

STATE OF MONTANA

The following file has been sent to you through the State of Montana File Transfer Service:

FILE NAME:	09 Appendix G.pdf
SENT FROM:	Dicki Peterson
MESSAGE:	Submittal #3 Includes folder 07 Appendix E, 08 Appendix F, 09 Appendix G, and 10 Appendix H. Dicki Peterson Permit Coordinator Western Energy Company / Westmoreland Savage Corporation dpeterson@westmoreland.com 406/748-5124

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Gilbert, Sharona

From: File Transfer Service <TransferService@MT.gov>
Sent: Monday, August 29, 2016 3:10 PM
To: DEQCoal
Subject: State of Montana File Transfer Service

FILE TRANSFER SERVICE

STATE OF MONTANA

The following file has been sent to you through the State of Montana File Transfer Service:

FILE NAME:	10 Appendix H.pdf
SENT FROM:	Dicki Peterson
MESSAGE:	Submittal #3 Includes folder 07 Appendix E, 08 Appendix F, 09 Appendix G, and 10 Appendix H. Dicki Peterson Permit Coordinator Western Energy Company / Westmoreland Savage Corporation dpeterson@westmoreland.com 406/748-5124

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Gilbert, Sharona

From: File Transfer Service <TransferService@MT.gov>
Sent: Monday, August 29, 2016 3:02 PM
To: DEQCoal
Subject: State of Montana File Transfer Service

FILE TRANSFER SERVICE

STATE OF MONTANA

The following file has been sent to you through the State of Montana File Transfer Service:

FILE NAME:	04 Appendix B.pdf
SENT FROM:	Dicki Peterson
MESSAGE:	Here is the next round of files - folders 03 Appendix A, 04 Appendix B, 05 Appendix C, and 06 Appendix D Dicki Peterson Permit Coordinator Western Energy Company / Westmoreland Savage Corporation dpeterson@westmoreland.com 406/748-5124

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Gilbert, Sharona

From: File Transfer Service <TransferService@MT.gov>
Sent: Monday, August 29, 2016 3:02 PM
To: DEQCoal
Subject: State of Montana File Transfer Service

FILE TRANSFER SERVICE

STATE OF MONTANA

The following file has been sent to you through the State of Montana File Transfer Service:

FILE NAME:	03 Appendix A.pdf
SENT FROM:	Dicki Peterson
MESSAGE:	Here is the next round of files - folders 03 Appendix A, 04 Appendix B, 05 Appendix C, and 06 Appendix D Dicki Peterson Permit Coordinator Western Energy Company / Westmoreland Savage Corporation dpeterson@westmoreland.com 406/748-5124

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Gilbert, Sharona

From: File Transfer Service <TransferService@MT.gov>
Sent: Monday, August 29, 2016 3:02 PM
To: DEQCoal
Subject: State of Montana File Transfer Service

FILE TRANSFER SERVICE

STATE OF MONTANA

The following file has been sent to you through the State of Montana File Transfer Service:

FILE NAME:	05 Appendix C.pdf
SENT FROM:	Dicki Peterson
MESSAGE:	Here is the next round of files - folders 03 Appendix A, 04 Appendix B, 05 Appendix C, and 06 Appendix D Dicki Peterson Permit Coordinator Western Energy Company / Westmoreland Savage Corporation dpeterson@westmoreland.com 406/748-5124

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Gilbert, Sharona

From: File Transfer Service <TransferService@MT.gov>
Sent: Monday, August 29, 2016 3:02 PM
To: DEQCoal
Subject: State of Montana File Transfer Service

FILE TRANSFER SERVICE

STATE OF MONTANA

The following file has been sent to you through the State of Montana File Transfer Service:

FILE NAME:	06 Appendix D.pdf
SENT FROM:	Dicki Peterson
MESSAGE:	Here is the next round of files - folders 03 Appendix A, 04 Appendix B, 05 Appendix C, and 06 Appendix D Dicki Peterson Permit Coordinator Western Energy Company / Westmoreland Savage Corporation dpeterson@westmoreland.com 406/748-5124

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Gilbert, Sharona

From: File Transfer Service <TransferService@MT.gov>
Sent: Monday, August 29, 2016 2:47 PM
To: DEQCoal
Subject: State of Montana File Transfer Service

FILE TRANSFER SERVICE

STATE OF MONTANA

The following file has been sent to you through the State of Montana File Transfer Service:

FILE NAME:	2a AutoCAD Drawings.pdf
SENT FROM:	Dicki Peterson
MESSAGE:	Sharona - I'm really sorry about having to send this submittal in so many separate files. I've been trying all day to send this to you. This time you should have the folders 00 Table of Contens, 01 Permit, 02 Exhibits, 2a AutoCAD Drawings Dicki Peterson Permit Coordinator Western Energy Company / Westmoreland Savage Corporation dpeterson@westmoreland.com 406/748-5124

To download this file, click on the link below:

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https://transfer.mt.gov/

Gilbert, Sharona

From: File Transfer Service <TransferService@MT.gov>
Sent: Monday, August 29, 2016 2:47 PM
To: DEQCoal
Subject: State of Montana File Transfer Service

FILE TRANSFER SERVICE

STATE OF MONTANA

The following file has been sent to you through the State of Montana File Transfer Service:

FILE NAME:	02 Exhibits.pdf
SENT FROM:	Dicki Peterson
MESSAGE:	Sharona - I'm really sorry about having to send this submittal in so many separate files. I've been trying all day to send this to you. This time you should have the folders 00 Table of Contens, 01 Permit, 02 Exhibits, 2a AutoCAD Drawings Dicki Peterson Permit Coordinator Western Energy Company / Westmoreland Savage Corporation dpeterson@westmoreland.com 406/748-5124

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Gilbert, Sharona

From: File Transfer Service <TransferService@MT.gov>
Sent: Monday, August 29, 2016 2:47 PM
To: DEQCoal
Subject: State of Montana File Transfer Service

FILE TRANSFER SERVICE

STATE OF MONTANA

The following file has been sent to you through the State of Montana File Transfer Service:

FILE NAME:	00 C2011003F Table of Contents 2016-08.pdf
SENT FROM:	Dicki Peterson
MESSAGE:	Sharona - I'm really sorry about having to send this submittal in so many separate files. I've been trying all day to send this to you. This time you should have the folders 00 Table of Contens, 01 Permit, 02 Exhibits, 2a AutoCAD Drawings Dicki Peterson Permit Coordinator Western Energy Company / Westmoreland Savage Corporation dpeterson@westmoreland.com 406/748-5124

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Gilbert, Sharona

From: File Transfer Service <TransferService@MT.gov>
Sent: Monday, August 29, 2016 2:47 PM
To: DEQCoal
Subject: State of Montana File Transfer Service

FILE TRANSFER SERVICE

STATE OF MONTANA

The following file has been sent to you through the State of Montana File Transfer Service:

FILE NAME:	01 Permit.pdf
SENT FROM:	Dicki Peterson
MESSAGE:	Sharona - I'm really sorry about having to send this submittal in so many separate files. I've been trying all day to send this to you. This time you should have the folders 00 Table of Contens, 01 Permit, 02 Exhibits, 2a AutoCAD Drawings Dicki Peterson Permit Coordinator Western Energy Company / Westmoreland Savage Corporation dpeterson@westmoreland.com 406/748-5124

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