

**OFFICE OF SURFACE MINING RECLAMATION AND ENFORCEMENT**

**Annual Evaluation Summary Report  
for the  
Abandoned Mine Land Reclamation Program  
Administered by the Department of Environmental Quality  
of**

**MONTANA**

**for**

**Evaluation Year 2014  
July 1, 2013 to June 30, 2014**

**Prepared by  
Casper Area Office  
October 2014**



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*Cover Page Photo: Reconstructed stream channels and installation of geo-net lining on tailings repository at McLaren Tailings Reclamation Project at Cooke City, MT (June 19, 2014.)*

# **Executive Summary**

## **Montana's Abandoned Mine Land Program**

### **Evaluation Year 2014**

Evaluation of the State of Montana's reclamation program is conducted by the Casper Area Office (CAO) of the Office of Surface Mining Reclamation and Enforcement (OSMRE). Evaluation Year (EY) 2014 consisted of a full twelve month period beginning on July 1, 2013 and ending on June 30, 2014. The OSMRE has completed its evaluation of topics specified in the Performance Agreement between the Montana Abandoned Mine Land Program (MTAML) and the OSMRE. This evaluation specifically examined the following seven topic areas to evaluate MTAML performance, as identified in the EY 2014 Performance Agreement between the two Agencies:

- 1) Overall Reclamation Success
- 2) AML Emergency Investigations and Abatement Efforts
- 3) AML Grant Fiscal and Administrative Controls
- 4) Subsidence Prone Area Inventory
- 5) Acid Mine Drainage
- 6) Red Lodge Land Settlement Issues
- 7) Public Outreach

The MTAML met the goals of abating hazards and improving site conditions at both coal and non-coal projects. Industrial wastes associated with abandoned hardrock mills were disposed of in the appropriate repositories and permitted solid waste disposal facilities. Hazardous equipment and wastes were removed and the areas sufficiently reclaimed for use by the general public. Coal mine fires were extinguished, slumps and subsidence features were mitigated, and sites were re-vegetated. All construction adhered to the standards of construction excellence maintained by the MTAML.

Financial Stature Reports were submitted within the required timeframes with no deficiencies noted. Review of the Montana AML Grant Accounting program confirmed that recent audits had no questioned or disallowed costs associated with OSMRE-Montana AML grant(s).

The MTAML has been regularly monitoring acid mine drainage (AMD) problems in the State, while pursuing possible ways to address the problem in a cost effective manner. They have employed various techniques to address and control AMD but with varied success. The MTAML continues to monitor the problem and pursue alternatives to procure funding at the level necessary to resolve the AMD problem, including possible construction/installation of a water treatment facility.

We have concluded that the MTAML is adhering to the public participation and involvement policy of the Montana Abandoned Mine Land Reclamation (AMLR) plan by holding public meetings regarding potential AML project sites. They have also gone far beyond what is in their plan by conducting tours, participating in public events, giving local presentations and otherwise making their presence and the benefits of the AML program known to the public.

# I. General

## A. Introduction

The Surface Mining Control and Reclamation Act of 1977 (SMCRA) created the Office of Surface Mining Reclamation and Enforcement (OSMRE) in the Department of the Interior to oversee regulation of coal exploration, surface coal mining and reclamation operations, and reclamation of lands adversely affected by past mining practices. SMCRA provides that, if certain conditions are met, a state may assume primary authority (Primacy) for reclamation of abandoned mine lands (AML) within its borders. Once a state has obtained such approval, the OSMRE has the responsibility to make investigations, evaluations, and inspections necessary to determine whether that State's AML program is being administered in accordance with approved program provisions. On November 24, 1980, the Secretary of the Department of Interior approved Montana's AML Reclamation Plan under Title IV of SMCRA. Montana's approved Reclamation Plan sets forth authority, policies, and procedures under which Montana operates its program. With the 1980 approval, the State assumed exclusive responsibility and primary authority for non-emergency AML projects within Montana. On August 18, 1983, the Secretary approved Montana's April 20, 1983 amendment to its AML Reclamation Plan allowing Montana to assume responsibility for an emergency response reclamation program. On April 11, 1990, the OSMRE announced in Federal Register notice (55 FR 13552) that Montana had certified that all of the State's known coal problems had been addressed, and requested public comment. In Federal Register notice (55 FR 28022) of July 9, 1990, the OSMRE approved the certification and authorized Montana to reclaim non-coal hazards. The Montana Department of Environmental Quality (MDEQ), Remediation Division, Abandoned Mined Lands Bureau currently administers these programs.

Evaluation of the State reclamation program is conducted by the Casper Area Office (CAO) of the OSMRE. Evaluation Year (EY) 2014 consisted of a full twelve month period beginning on July 1, 2013 and ending on June 30, 2014. The OSMRE's evaluation methods are based upon OSMRE Directive AML-22 (Evaluation of State/Tribe Abandoned Mine Lands Programs) and a Performance Agreement (PA) dated June 17, 2013 between the Montana Abandoned Mine Land Program (MTAML) and the OSMRE. This agreement incorporates a shared commitment by the State and the OSMRE in determining how annual evaluations will be conducted. The State takes an active role in the entire evaluation process. The process is designed to evaluate whether the State, through its AML reclamation (AMLR) program, is achieving the overall objective of Section 102 of SMCRA which states that the AMLR programs are to:

"... promote the reclamation of mined areas left without adequate reclamation prior to the enactment of this Act and which continue, in their unreclaimed condition, to substantially degrade the quality of the environment, prevent or damage the beneficial use of land or water resources, or endanger the health or safety of the public ..."

The agreement establishes a commitment between the MTAMLP and the OSMRE to identify topics for review, identify methodologies for enhancement and evaluation of performance reviews, and assist in the preparation of the final report. Assessment of the MTAMLP performance includes reviews of selected topics such as 1) overall reclamation success, 2) emergency investigations and abatement efforts, 3) grant fiscal and administrative controls, 4) subsidence prone area inventory, 5) acid mine drainage, 6) Red Lodge land settlement issues, and 7) public interaction and outreach.

The following acronyms are used in this report:

AMD	Acid Mine Drainage
AML	Abandoned Mine Land
AMLIS	Abandoned Mine Land Inventory System
AMLR	Abandoned Mine Land Reclamation
ATP	Authorization to Proceed
CAO	Casper Area Office
CIL	Certified in Lieu funds
EY	Evaluation Year
GPRA	Government Performance Results Acts
MDEQ	Department of Environmental Quality
MTAMLP	Montana Abandoned Mine Land Program
NTTP	National Technical Training Program
OIG	Office of the Inspector General
OSMRE	Office of Surface Mining Reclamation and Enforcement
PA	Performance Agreement
PAD	Problem Area Definition
PBRF	Prior Balance Replacement Funds
SMCRA	Surface Mining Control and Reclamation Act
TIPS	Technical Innovation and Professional Services

## **B. Program Administration**

Overall, the State of Montana administers the MTAMLP under SMCRA, the approved State Reclamation Plan, and the Federal Assistance Manual; and associated rules, regulations and policy decisions. The State administers an excellent AMLR program in a manner reflecting high quality professionalism and performance, in addition to excellent communication and cooperation between consulting agencies and other interested parties. The MTAMLP currently supports 10.3 full-time employees (FTEs) and is based in the capital city, Helena. The CAO and the MTAMLP regularly consult and interact with one another.

The Montana AMLR program was initiated in 1980. For the next ten years, the State concentrated on abating the hazards left by past coal mining practices. In 1990, the State certified that all of its known coal problems had been addressed, at which time they were authorized by the OSMRE to begin reclaiming the multitude of high priority, non-coal hazards in their inventory. However, any abandoned coal problems that are discovered

must still be given priority funding over non-coal projects -a requirement that has been followed by Montana.

Initial investigation is usually conducted by the project officer who 1) conducts initial investigation; 2) obtains landowner consents; 3) negotiates inter-agency agreements if necessary; 4) writes environmental assessments; 5) conducts cultural resource and threatened and endangered species investigations and consultations; 6) conducts public meetings for information dissemination and comment; 7) prepares the submission to the OSMRE for an Authorization to Proceed (ATP); and 8) conducts public meetings for the local stakeholders and potential construction contractors.

Prior to initiating any construction work, the MTAMLPLP submits a documentation package to the OSMRE with a request for an ATP. This package includes 1) a complete Environmental Assessment or Categorical Exclusion, 2) a project eligibility determination pursuant to 30 CFR 874.12 prepared by the DEQ Attorney, 3) a threatened and endangered plant and animal species survey, and consultation results with the U.S. Fish and Wildlife Service, 4) consultation results with the State Historic Preservation Office, and 5) site maps and photographs. If acceptable and complete, the CAO issues an ATP pursuant to section 4-160-50D.3 of the 2011 Federal Assistance Manual to the MTAMLPLP prior to reclamation or construction of each coal project.

The State uses an established bid process to obtain services from qualified environmental, engineering, design and construction companies at the lowest effective price. Environmental hazard investigations, construction design and reclamation construction portions of each AML project are completed by private contractors. Design and specification work is contracted to engineering firms and is accomplished during the winter months when most outside work is impractical. Actual reclamation work starts as soon as weather and ground conditions allow heavy equipment to be moved to a site. Many of the sites presently being reclaimed are in mountainous terrain and at high altitudes. This fact may drastically shorten the amount of time available for reclamation work because of snow, ice and mud. A part of the responsibility of each engineering design contractor is to provide an inspector for the construction work. This inspector is on site during working hours to ensure that the work is being completed according to the plans and specifications that have been approved by the MTAMLPLP.

The MTAMLPLP staff are very knowledgeable and dedicated to the accomplishment of program goals. An excellent working relationship exists between the staff of the MTAMLPLP, the CAO, and other State and Federal agencies contacted during the course of preparing projects for reclamation. MTAMLPLP personnel spend most of the construction season in the field coordinating and supervising reclamation work, while preparing future projects for reclamation. Some construction work may continue into the winter months but the staff primarily spends this time of the year working with the design contractors to get projects ready for the upcoming construction season.

## **II. Noteworthy Accomplishments**

### **A. Overall Performance**

The Montana DEQ continues to administer an efficient and successful AML program, as set forth in Section 102 of SMCRA. Significant hazards on both coal and non-coal sites remain to be mitigated, so future funding will be required. A summary of specific projects worked on or completed during this EY is provided in Section V. below.

## **III. Utilization of OSMRE Technological Assistance**

The OSMRE provides technical assistance and technology support to State AML and Regulatory Programs at the individual State level on project-specific efforts, and at the national level in the form of meetings, forums, and initiatives. The Western Region's (WR's) Program Support Division provides direct technical assistance in project and problem investigation, design and analysis, permitting assistance, developing technical guidelines, and training support. The WR also works on the development of regional and national forums, meetings and initiatives to ensure that interests and needs of individual States are considered and included in these events. The WR initiated a regional Technology Transfer Team in 2003, for which each State, including Montana, has a representative.

During EY2014, the OSMRE provided Montana with the following assistance:

### **A. National Technical Training Program (NTTP)**

MTAML staff attended two NTTP classes offered during EY2014 (does not include Regulatory staff).

### **B. Technical Innovation and Professional Services (TIPS)**

Two MTAML staff members attended two separate TIPS training classes offered during EY2014.

### **C. Use of OSMRE Provided Equipment & Services**

MTAML staff borrowed a down-hole bore camera from the OSMRE's TIPS program to inspect various subsidence features/wells.

Montana DEQ had a Title IV and Title V representative participate in monthly Western Region Technology Transfer calls.

MTAML staff did not utilize equipment from the OSMRE's Technology Transfer Program in EY2014.

The OSMRE's librarian did not fill any reference requests or provided any article reprints for the MTAML staff in EY2014.

#### **D. Financial Assistance**

During FY 2014, the OSMRE provided \$11,663,885.15 in AML grant funding to the Montana AML program. Grant No. S14AS00002 began on July 1, 2014 and is scheduled to end on June 30, 2022. This grant funded the continued administration of the Montana state AML program during the period of July 1, 2014 through June 30, 2015, and will provide project development and construction funding for a period of ten years.

Distribution of Montana's AML FY2014 Consolidated Grant:

\$946,695.49 Administrative Costs (H2.01)  
\$3,229,077.51 Project/Construction Costs (H2.03)  
\$7,488,112.15 Project/Construction Costs (HS.03)  
\$11,663,885.15 Total

### **IV. Public Participation and Outreach**

#### **A. OSMRE**

The OSMRE Casper Area Office (CAO) provides for transparency in the oversight process by conducting outreach to stakeholders and encouraging public participation throughout the OSMRE-CAO's annual oversight activities. The OSMRE's programmatic reviews of the Montana AML program indicate that the MT DEQ is adhering to the State's policies and procedures regarding opportunities for public participation in all phases of the reclamation program. The public can find oversight guidance documents and the OSMRE's Performance Agreement with the Montana AML Program on the following OSMRE website:

<http://www.wrcc.osmre.gov/programs/stateTribalOversight/Montana.shtm>

Each evaluation year, the OSMRE-CAO solicits input from the public and interested parties regarding the oversight process, and allows them to provide suggestions for potential oversight evaluation topics, and improvements of future annual evaluation reports. During the 2014 evaluation year, the CAO received no comments or suggestions specific to the MTAML. However, the CAO will continue to address issues and concerns as they develop and in subsequent evaluation years.



## **B. Montana**

Our 2014 evaluation of public interaction investigated whether or not the MTAML P is performing public outreach efforts by holding meetings subsequent to new grant applications. The Montana AMLR Plan requires that the public be afforded the opportunity to comment on abandoned mine reclamation projects. The MTAML P considers the public an important component of the reclamation program, and conducts local outreach meetings in the community nearest each project. The meetings are well publicized and are held in the evenings or on weekends in order to allow maximum citizen participation. Overall plans for the project area, construction designs, maps, overlays, and aerial photographs are presented and discussed at each public meeting.

Individuals may submit comments in writing, or meet with the project officers at any time prior to completion of the comment period for a project. Project officers also meet with affected landowners to explain each project in detail, as well as keep them informed of progress throughout the construction phase. Work plans are often altered to conform to comments received from landowners, contractors and the general public.

The MTAML P held several public meetings in EY14, including: Red Lodge (subsidence issues within/near the Town); McLaren Tailings (annual update to community and stakeholders); Musselshell County Commission (mine subsidence issues under County roads); and Belt AMD Treatment (public meeting to present plans for water treatment evaluation).

The MTAML P goes to great lengths to develop and maintain good working relationships with all State and Federal agencies, such as the U.S. Forest Service (USFS), the Bureau of Land Management (BLM), U.S. Fish and Wildlife Service (USFWS), the U.S. National Park Service (NPS), the Montana Department of Natural Resources and the Montana Department of Fish Wildlife and Parks. In most cases, these agencies will accept National Environmental Policy Act efforts conducted by the MTAML P for projects within Federal and State jurisdiction. This practice carries over into relationships with local agencies and groups, and to landowners who have AML sites on their land. The MTAML P participates in an annual meeting (conducted February 27, 2014) with the BLM, USFS, the Environmental Protection Agency, the Montana Superfund Program, and the Federal Superfund Program to coordinate activities and enhance information sharing.

The MTAML P provides further opportunities for public participation and involvement through its internet website and press releases. The MTAML P posts Expanded Engineering Evaluation/Cost Analysis Reports of proposed projects, Reclamation Investigation reports, environmental reports, construction bid notices, notices of public hearings of proposed AML projects, final construction reports and “A Guide to Abandoned Mine Reclamation” on its website at <http://www.deq.mt.gov/AbandonedMines/default.mcp.x>.

They have also recorded a significant amount of Montana mining history on the website to help mitigate the loss of important cultural resources during the reclamation process and provide that information to educational facilities, and interested parties through the website. The DEQ also has public relations personnel who release news items to media outlets such as local television stations, statewide newspapers, public radio and on the DEQ website.

We have concluded that the MTAML is adhering to the public participation and involvement policy of the Montana AMLR plan by holding public meetings regarding potential AML project sites. They have also gone far beyond what is in their plan by conducting tours, participating in public events, giving local presentations and otherwise making their presence and the benefits of the AML program known to the public.

## **V. Results of Evaluation Year 2014 Reviews**

### **Topic-Specific Reviews**

The MTAML Performance Agreement (PA) was signed in June, 2013 and applies to EY 2014. The PA describes the topics selected for review to evaluate the performance of the MTAML. On-the-ground, performance-based results were the principal focus of program evaluation and documentation.

- 1) Overall Reclamation Success
- 2) AML Emergency Investigations and Abatement Efforts
- 3) AML Grant Fiscal and Administrative Controls
- 4) Subsidence Prone Area Inventory
- 5) Acid Mine Drainage
- 6) Red Lodge Land Settlement Issues
- 7) Public Outreach

Topic evaluation reports and individual project reports containing much more detail are on file in the 2014 Annual Evaluation files at the Casper Area Office. As identified in the 2013-2014 PA, the following topics were selected for evaluation; 1) Overall Reclamation Success; 2) AML Emergency Investigations and Abatement Efforts; 3) AML Grant Fiscal and Administrative Controls; 4) Subsidence Prone Area Inventory; 5) Acid Mine Drainage; 6) Red Lodge Land Settlement Issues; and 7) public interaction and outreach. Results of the 2014 evaluations are provided below. The evaluations included field visits to AML projects, interviews with MTAML staff, reviews of project specifications, grant applications and reports, as well as AMLIS inventories.

## 1. Overall Reclamation Success

### McLaren Tailings Reclamation Project (non-coal) at Cooke City, MT:

The 2013 construction season at the McLaren Tailings Reclamation Project extended from May 28 through October 11. Work completed from July through October 2013 included the excavation of the final tailings remaining at the site, compaction of these tailings in the repository, final grading of the repository, and installation of the liner system. During this period, approximately 2,400 feet of Soda Butte Creek and Miller Creek formerly covered by the tailings impoundment were reconstructed in their approximate pre-mining locations. Following the excavation of the tailings along the west end of the project area near the tailings dam, the water treatment plant was deactivated and removed from the site. The east project bridge was relocated over the reconstructed channel of Soda Butte Creek and the west bridge was removed. Winter shutdown occurred on October 11, 2013. The 2014 construction season began on June 5. Work during June 2014 included installing the top geonet drainage layer over the High-Density Polyethylene (HDPE) liner on the repository, delivery and mixing of compost with soils, and placing amended cover soils over the project site.

OSMRE staff visited the site with MTAML staff in June of 2014. At that time the stream channel reconstruction was mostly completed and the geonet drainage layer (final layer of a 3-part liner system) was being installed on the repository tailings in preparation for cover-soil to be applied. Work on the project is ahead of schedule.



Photo: Recently reconstructed stream channel (Soda Butte Creek) through the project area, with the installation of the top geonet layer on repository occurring in the background during the OSMRE site-visit on June 19, 2014.

Forest Rose Mine Reclamation Project (non-coal) near Drummond, MT:

Reclamation activities involved in this project generally consisted of excavating waste rock and tailings; hauling and placing waste in a top-lined repository; removing mine structures that impeded construction; diverting water from various springs and seeps; diverting Dunkleberg Creek during construction; reconstructing the Dunkleberg Creek channel by installing log and boulder weirs; widening and resurfacing the USFS Road; and revegetating disturbed areas. Final completion of the project occurred on October 9, 2013.



Photo: Excavation of tailings at the Forest Rose Project site.

Nelson #1 and Cottonwood No. 6 Drainage and Ditch Repair Reclamation Project:

The project site is located in and around the communities of Stockett and Sand Coulee, southeast of Great Falls. The purpose of this project was to complete repairs and perform maintenance activities on two sites which had been the subject of previous reclamation projects completed between 1980 and 1995. The “Nelson #1 Mine Drain Repair” portion of the project is located within, and adjacent to, the town of Sand Coulee and included repairs to an AMD ditch and outfall system, along with some surface restoration. The “Cottonwood No.6 Drainage Ditch Repair” portion of the project is located in Cottonwood Coulee several miles above the town of Stockett and included repairs to an open ditch AMD conveyance system, along with some surface restoration. Additional items included replacement of an existing culvert under the main road (East Hunter Road) below the Nelson site, backfilling and sealing of three hazardous mine openings discovered above the Nelson and Cottonwood sites, and installation of a mine drain pipe into the collapsed Cottonwood Mine adit. The construction costs totaled



\$195,795 and work occurred between April 30, 2014 – June 4, 2014. OSMRE staff visited the site on June 17, 2014, and work was completed at that time.



Photo: Lined ditch constructed above the town of Sand Coulee, photo taken during OSMRE site visit on June 17, 2014.

#### Spring Meadow Residential Yards Project:

The Spring Meadow Residential Yards Project was undertaken by the Montana DEQ AML Program to address metals contamination (arsenic (As), lead (Pb) and manganese (Mn)) in residential yards located west of Spring Meadow Lake in Helena, Montana. The metal contamination is associated with historic ore processing. In 2009, the DEQ AML Program reclaimed 12 acres of contaminated soil and sediment in the Spring Meadow Lake State Park. Evaluation of properties adjacent to Spring Meadow Lake State Park identified three residential properties that contained elevated levels of As, Pb, and Mn in the soil above action levels. The objective of this project was to limit or eliminate human exposure to As, Pb, and Mn contamination above residential action levels at the three properties. The objective was achieved by excavating and properly disposing of impacted soil, backfilling excavated areas with clean soil, revegetating backfilled areas and reconstructing/replacing surface features impacted during the process.

Reclamation construction commenced on April 21, 2014 and was complete on June 2, 2014. During the reclamation construction 2,032 tons of soil with elevated levels of As, Pb, and Mn were excavated and transported for disposal at the Lewis and Clark County Landfill. The extent of excavation was estimated based on the results of soils investigation and confirmed in the field through screening with an x-ray fluorescence (XRF) analyzer. Excavated areas were backfilled with clean, imported fill materials placed to the approximate original ground grades. After the clean backfill was placed,

surface features removed prior to excavation were restored. This included: planting new trees, placing new sod, importing clean gravel for driveways, reconstructing fences, reconstructing planters, reconstructing decorative rock walls, reconstructing patios, and reconstructing a deck and ramp. Salvaged materials were used whenever possible, however new materials were also required. Total construction cost of the project was \$302,176.

Our 2014 evaluation of overall reclamation success was conducted to determine if MTAML's reclamation program met project goals. We compared MTAML's reclamation to project specifications, results of interagency consultation, and other information. Our evaluation focused on determining whether reclamation met project goals by implementing the scope of work to abate original hazards, complying with conditions (if any) resulting from interagency consultation, and improving overall site conditions compared to pre-reclamation conditions. Generally, we agreed projects met their goals if abatement and reclamation measures were intact and functional, and if no problems compromising those measures were apparent. We considered site conditions improved overall if hazards to public health and safety were abated and associated reclamation reduced environmental problems such as erosion and sedimentation while promoting re-vegetation.

## 2. AML Emergency Investigations and Abatement Efforts

There is no longer OSMRE Emergency Funding designated for emergencies, but situations where human health, safety, or property damage are threatened are dealt with by the MTAML as "Rapid Response" projects.

Our 2014 evaluation of AML emergency investigations and abatement efforts examined whether emergency criteria of the State AMLR plan were satisfied and the subsequent project(s) were completed as described in the AML Emergency Investigation report. Several instances of coal subsidence were reported throughout eastern Montana during the EY. None of these threatened property damage so none were considered to be emergencies.

## 3. AML Grant Fiscal and Administrative Controls

In 2006, Congress approved the Surface Mining Control and Reclamation Act (SMCRA) Amendments of 2006 as part of the Tax Relief and Health Care Act of 2006 (P.L. 109-432). Part of the amendments changed the funding amounts and funding calculations to both certified and uncertified States and Tribes. The Amendments created two new funding mechanisms for certified States and Tribes: Prior Balance Replacement Funds (PBRF) under Section 411(h)(1) and Certified in Lieu funds (CIL) under Section 411(h)(2). PBRF are State Share moneys that were not distributed over past years and now will be distributed in their entirety over a seven year period starting in Federal FY 2008. PBRF may be used for those purposes the State legislature or Tribal council establishes, giving priority to addressing the impacts of mineral development (30 CFR § 872.31). CIL funds are State Share moneys that would otherwise be distributed from the Abandoned Mine Lands Fund, only these moneys for certified States and Tribes are now

distributed from the general funds of the United States Treasury that are otherwise unappropriated. CIL funds are distributed to certified States and Tribes at 25% the first year, 50% the second year, 75% the third year and 100% the fourth year and thereafter starting in Federal FY 2009 (30 CFR § 872.33). There are no limitations or restrictions on the use of CIL funds in the SMCRA Amendments of 2006 (30 CFR § 872.34).

Montana certified completion of all known Priority 1 and 2 (P1 and P2) coal problems on April 11, 1990, with the Secretary of the Interior concurring on July 9, 1990. Montana's funding is now exclusively derived from funds under Sections 411(h)(1) and 411(h)(2). As a condition of certification, Montana is required to treat all Priority 1, 2 and 3 coal problems as they arise.

The Montana legislature allocates all PBRF and CIL moneys to the MTAML to fund abandoned mine reclamation activities. Rather than using PBRF moneys for projects of their choosing as is allowed under the law (30 CFR 872.31), the Montana Legislature has designated all funds to the Abandoned Mine Reclamation program for the satisfaction of its mission (Montana Code Annotated, 82-4-1006 Abandoned Mine Reclamation Account). Montana's PBRF moneys remain constant at \$8,069,086 until it expires in Federal Fiscal Year 2014. Montana's CIL moneys reached 100% in Federal FY 2012 and will remain at that level until FYs 2018 and 2019 when the percentages of 75%, 50% and 25% not paid out respectively in FYs 2008, 2009 and 2010 are recaptured and paid out in two equal payments in 2018 and 2019 in addition to the annual CIL payment. It is presumed that the MTAML will continue reclamation of all Priority 1, 2 and 3 coal problems as they are identified, and direct the remaining moneys to hard rock and other non-coal mining problems.

#### 4. Subsidence Prone Area Inventory

-Coal inventory: During EY 2014, A total of 5 Montana Counties were surveyed (Blaine, Prairie Fallon, Fergus and Wibaux) and had abandoned coal mine inspections completed for all sites within their borders during the time period 1 July 2013 through 30 June 2014. The Montana AML helicopter was the primary tool used to maximize the efficiency of the inventory process. The total number of abandoned coal mine sites inventoried during the above time period equaled 248 Problem Area Description (PAD) sites. In the following table are the results of those inspections with their corresponding eAMLIS codes (not including NSD or unknown), there may be multiple problem types associated with PAD sites:

<b>Problem Type Code</b>	<b>Description</b>	<b>Count</b>
CS-1	Clogged Streams	1
CSL-1	Clogged Stream Lands	1
DP-1	Industrial/Residential Waste	1
DPE-1	Dangerous Piles and Embankments	8
DS-1	Dangerous Slides	1
EF-1	Equipment/Facility	2
GO-1	Gob	1
HEF-1	Hazardous Equip & Facilities	1
IRW-1	Industrial/Residential Waste	3
MO-1	Mine Opening	83
MO-2	Mine Opening	3
P-1	Portals	42
P-2	Portals	5
P-3	Portals	2
PI-1	Pits	2
PI-3	Pits	3
PWAI-1	Polluted Water: Agricultural & Industrial	1
S-1	Subsidence	9
S-2	Subsidence	5
S-3	Subsidence	8
SA-1	Spoil Area	12
SB-1	Surface Burning	1
SI-1	Slurry	6
UMF-1	Underground Mine Fires	4
VO-1	Vertical Openings	14

During the federal fiscal year 2014, the CAO issued ATPs for several coal subsidence remediation projects which were subsequently completed or nearly completed, and detailed below:

Coal subsidence work was completed at Shoal-Meyer (C4611) in Sheridan County in August 2013. The project reclaimed two coal subsidence features at a cost of \$8,460. They required an estimated 170 yds<sup>3</sup> of fill material to be imported, placed, and compacted. Reclamation activity was concluded on May 24, 2013 by George Rabel Excavation.



Coal subsidence work was completed at the Kelly & O'Grady (CI0736) in Daniels County. The four subsidence features required a total of 160yds<sup>3</sup> of fill material to reclaim. Fill was placed and compacted in 2' lifts. Reclamation activity occurred on August 30-31, 2013 by Fugere Trucking & Backhoe Service for a total of \$4,700. Additional subsidence work was completed in June 2014, which reclaimed two additional subsidence features with approximately 20 yds<sup>3</sup> of fill material for \$1,000.

Coal subsidence work was completed at the Raymond Mine (C4615) in Sheridan County in September 2013. The project reclaimed five subsidence features for \$5,000. One additional coal subsidence site was reclaimed at the Raymond Mine in June 2014 for \$2,800. Reclamation activity consisted of salvaging the extant topsoil from within the features, exposing the entire feature by removing the crown, hauling, placing, and compacting the fill material, re-placing the topsoil, and re-grading the surface to promote runoff.

Coal subsidence work was substantially completed at Lagerquist (Wheeler-Lagerquist (C4622) and Anderson-Lagerquist-Elm (CI2749) in Sheridan County in FY2014. The Wheeler-Lagerquist project site is comprised of 21 separate subsidence features, various abandoned mining implements, and approximately 3,000 abandoned vehicle tires. This project has been awarded a \$300,000 Reclamation and Development grant from the Montana Department of Natural Resources and Conservation for the purposes of off-setting some construction costs. The neighboring Anderson-Lagerquist-Elm Mine reclamation project will consist of ameliorating 11 subsidence features. The project was substantially complete in June 2014, but seeding and construction closeout remains, construction costs total \$254,039.

Coal subsidence work was completed at the Storm King Mine (C0905) in Custer County in FY2014. The Storm-King site is comprised of two subsidence features and two riffs. The Project was completed in July 2013 and cost \$4500.

Coal subsidence work began at Divide North (CI404) in Fergus County in FY2014. The project, when finalized in FY2015 will have reclaimed a total of 23 subsidence features. The total construction costs are not yet available.

In addition to ATPs issued for subsidence, the CAO also issued an ATP for the Spring Meadow Lake Residential Yards Abandoned Mine Reclamation Project which involved removing and replacing contaminated soils within residential yards in the town of Helena, MT. This Project was completed on June 2, 2014.

-Red Lodge, Montana:

The primary/initial objective of this project is to gather information through core drilling to evaluate subsurface conditions and assess the condition of abandoned underground coal mine tunnels and pillars in the vicinity of several homes within the City of Red Lodge, MT. This information will be used to assess the potential of mine-induced subsidence. Historic maps indicate there are two levels of mine workings, and the depth to the mine workings and bedrock quality immediately above and below the workings are

critically important components of the investigation. OSMRE staff visited the site with MTAML staff on June 18, 2014.



Photo: One of several crack monitors installed on the foundations of homes in Red Lodge where subsidence concerns have been expressed.

## 5. Acid Mine Drainage

In 1990, the Governor of Montana certified to the Secretary of the Interior that Montana had completed reclamation of all known Priority 1 and 2 coal problems. Acid Mine Drainage (AMD), normally a Priority 3 problem, continued to plague the State's waterways. The heaviest concentrations of AMD are found in the Belt/Sand Coulee areas of the Great Falls Coal Field where 26 coal sites pose unmanageable AMD problems. These sites have had successful Priority 1 and 2 reclamation performed on surface features, but passive treatment of AMD problems has been unsuccessful. Passive treatments that have been attempted include limestone channels/drains, diversion of meteoric waters, and aerobic/ anaerobic constructed wetlands at the Johnson, Centerville, French Coulee and Stockett sites. All of these attempts have failed due to the high concentrations and loads of acidity, metals, and sulfates in AMD waters thereby causing armoring of de-acidifying materials. Additionally, Montana's harsh winters froze wetlands and massive metalliferous precipitation inhibited vegetation growth. The MTAML has monitored AMD on these sites since 1995.

AMD issues in the western states were brought to the OSMRE's attention at the time of the 1994 Appalachian Clean Stream Initiatives. In April of 1996, a field tour was conducted of eight sites in the Great Falls Coal Field to consider the possibility of using Clean Streams Initiative Funding for the AMD problems. Those in attendance consisted of staff from the Montana DEQ (including the MDEQ Director), the Montana Bureau of Mines and Geology, and the OSMRE (including the OSMRE-Western Region Director). Although AMD problems were acknowledged, no decisions were made for treatment. It was implied that there wasn't enough AML funding to act on the AMD problems. These problems were not entered into AMLIS, as there was no requirement for Priority 3 sites to be entered at that time. The OSMRE was aware of the AMD problems, but did not

require Montana to continue addressing them due to the inadequate funding and failed past treatment attempts. As such, the AMD issue has been largely unaddressed since then.

Montana is now re-approaching the AMD problem due to four reasons: 1) Montana has more funding available now than in the past, 2) treatment of AMD by active systems may now be a viable option, 3) under the 2006 Amendments to SMCRA, certified states must now address Priority 3 problems to maintain certification, and 4) investigations have shown that coal AMD is having a greater impact on regional groundwater and area surface water such that human populations are affected.

Since passive AMD treatment systems have been largely unsuccessful, the MTAMLP is considering the construction of active water treatment facilities. The MTAMLP is reviewing the possibility of constructing several water treatment plants at strategic locations along Belt and Sand Coulee Creeks. Polluted water could then be piped from multiple problem areas to one or more treatment facilities. The MTAMLP has indicated that construction, maintenance and repair of water treatment facilities for just three of the 26 AMD problem areas near Belt would require over \$42 million, whereas, treatment of all 26 AMD problem areas would require approximately \$228.4 million. Therefore, a current re-evaluation is underway to update the treatment options and costs.

## VI. Tables

<b>Table 1* – (Montana) Coal Status of AML Inventory all Priority 1, 2, and 3 Hazards on June 30, 2014</b>					
	High Priority		Elevated Priority 3	Stand-Alone Priority 3 (Not adjacent or in conjunction w/ P1&2)	Total
	Priority 1	Priority 2			
<b>UNFUNDED</b>					
<b>GPRA Acres</b>	105.51	447.3	N/A	111	663.81
<b>Dollars</b>	372,500.00	127,008,113.00	N/A	8,532,000.00	135,912,613.00
<b>FUNDED</b>					0.00
<b>GPRA Acres</b>	39	0	NR	0	39.00
<b>Dollars</b>	298,500	0	NR	0	298,500.00
<b>COMPLETED</b>					0.00
<b>GPRA Acres</b>	1,495.57	1,323.15	NR	3,691.01	6,509.73
<b>Dollars</b>	5,549,833.85	14,834,746.10	NR	10,177,035.00	30,561,614.95

\*While this table is intended to show information regarding all priority 1, 2, and 3 hazards, the e-AMLIS queries used to populate this table do not include information from all project areas, including those designated as a non-coal source. As a result, Table 1 effectively only shows the status of AML inventory

of all Coal Priority 1, 2, and 3 hazards. Using GPRA acres and percentages, it details the historical progress the State/Tribe AML program has made to reclaim all identified (coal) AML features or hazards within its jurisdiction.

<b>Table 1A**– (Montana) Non-Coal Status of AML Inventory all Priority 1, 2, and 3 Hazards on June 30, 2014</b>					
	High Priority		Elevated Priority 3	Stand-Alone Priority 3 (Not adjacent or in conjunction w/ P1&2)	Total
	Priority 1	Priority 2			
<b>UNFUNDED</b>					
<b>GPRA Acres</b>	0	1,232.50	N/A	1.01	1,233.51
<b>Dollars</b>	0.00	88,480,250.00	N/A	150,000.00	88,630,250.00
<b>FUNDED</b>					
<b>GPRA Acres</b>	67.20	30.10	NR	0	97.30
<b>Dollars</b>	26,782,450.00	3,675,370.00	NR	0	30,457,820.00
<b>COMPLETED</b>					
<b>GPRA Acres</b>	5.40	936.58	NR	47.70	989.68
<b>Dollars</b>	2,128,757.65	32,782,221.35	NR	978,300.00	35,889,279.00

\*\*Table 1A represents Non-Coal Priorities and was developed by querying Coal Priorities (Table 1 data) along with Certified 411(h)-1&2 Non-Coal, Non-Coal (P1, P2, and P3) and Non-Coal 411(F) Programs, then subtracting the values in Table 1. As a result, Table 1A effectively shows the status of AML inventory of all Non-Coal Priority 1, 2, and 3 hazards (the same process is used for distinguishing between Coal and Non-Coal for Tables 2/2A, 3/3A, and 4/4A). Using GPRA acres and percentages, the table details the historical progress the State/Tribe AML program has made to reclaim all identified (non-coal) AML features or hazards within its jurisdiction.

Table 2 - (Montana) Coal Accomplishments in Eliminating Health and Safety Hazards Related to Past Mining Priority 1 and 2 Hazards (As of June 30, 2014)

PROBLEM TYPE (keyword)																		
	Clogged Stream (CS) (miles)	Clogged Stream Lands (CSL) (acres)	Dangerous Pile or Embankment (DPE)(acres)	Dangerous Highwall (DH) (feet)	Dangerous Impoundment (DI) (count)	Dangerous Slide (DS) (acres)	Gases: Hazardous /Explosive (GHE) (count)	Hazardous Equip. /Facilities (HEF) (count)	Hazardous Water Body (HWB) (count)	Industrial/Residential Waste (IRW) (acres)	Portal (P) (count)	Polluted Water:Agri/Industrial (PWA)(count)	Polluted Water: Human Consumption (PWHC)(count)	Subsidence (S) (acres)	Surface Burning (SB) (acres)	Underground Mine Fire (UMF) (acres)	Vertical Opening (VO) (count)	TOTAL
<b>UNRECLAIMED/REMAINING HAZARDS (Unfunded)</b>																		
<b>Units</b>												3	85.00	107.81	5.00			200.81
<b>GPRA Acres</b>												15	425.00	107.81	5.00			552.81
<b>Dollars</b>												25,000.00	126,446,613.00	839,000.00	70,000.00			127380613.00
<b>ANNUAL RECLAMATION - EY2014 only (Completed)</b>																		
<b>Units</b>	1.2	2												7.61				10.81
<b>GPRA Acres</b>	6	10												7.61				23.61
<b>Dollars</b>	106,933.00	88,863.00												210,261.55				406,057.55
<b>HISTORICAL RECLAMATION - EY1978 - 2014 (Completed)</b>																		
<b>Units</b>	10.19	11.90	82.80	7,910.00	3.00	0.90		197.00		204.60	726.50	19.00	212.00	651.21	307.40	81.98	436.30	10,854.78
<b>GPRA Acres</b>	50.97	19.90	82.80	113.00	15.00	0.90		19.70		204.60	72.65	95.00	1,060.00	651.61	307.40	81.58	43.61	2,818.72
<b>Dollars</b>	1,255,627.00	205,628.00	972,126.00	438,454.00	14,000.00	1,000.00		839,766.00		124,041.00	2,324,265.00	1,165,650.63	1,185,845.92	6,280,325.90	2,154,350.00	2,348,289.50	1,075,211.00	20,384,579.95

Table 2A - (Montana) Non-Coal Accomplishments in Eliminating Health and Safety Hazards Related to Past Mining Priority 1 and 2 Hazards (As of June 30, 2014)

PROBLEM TYPE (keyword)																		
	Clogged Stream (CS) (miles)	Clogged Stream Lands (CSL) (acres)	Dangerous Pile or Embankment (DPE)(acres)	Dangerous Highwall (DH) (feet)	Dangerous Impoundment (DI) (count)	Dangerous Slide (DS) (acres)	Gases: Hazardous /Explosive (GHE) (count)	Hazardous Equip. /Facilities (HEF) (count)	Hazardous Water Body (HWB) (count)	Industrial/Residential Waste (IRW) (acres)	Portal (P) (count)	Polluted Water:Agri/Industrial (PWA)(count)	Polluted Water: Human Consumption (PWHC)(count)	Subsidence (S) (acres)	Surface Burning (SB) (acres)	Underground Mine Fire (UMF) (acres)	Vertical Opening (VO) (count)	TOTAL
<b>UNRECLAIMED/REMAINING HAZARDS (Unfunded)</b>																		
<b>Units</b>	21.00	86.60	261.20				630.00	8.00	582.10	191.00		0.00	38.10				80.00	1,898.00
<b>GPRA Acres</b>	104.00	86.60	261.20				63.00	40.00	609.40	19.10		0.00	38.10				9.80	1,231.20
<b>Dollars</b>	8,620,000.00	7,400,000.00	20,393,000.00				3,530,000.00	800,000.00	45,600,000.00	940,000.00		0.00	482,250.00				415,000.00	88,180,250.00
<b>ANNUAL RECLAMATION - EY2014 only (Completed)</b>																		
<b>Units</b>	0.5	6									1		0					7.5
<b>GPRA Acres</b>	2.5	30									0.1		0					32.6
<b>Dollars</b>	223,150.00	1507000.00									15,300.00		0					1,745,450.00
<b>HISTORICAL RECLAMATION - EY1978 - 2014 (Completed)</b>																		
<b>Units</b>	19.60	91.50	98.00	17,650.00	0.00	0.00	1.00	70.00	1.00	297.30	387.00	0.00	0.00	9.98	0.00	0.00	187.00	18,812.38
<b>GPRA Acres</b>	88.50	92.00	98.00	285.86	0.00	0.00	1.00	7.00	5.00	297.30	38.70	0.00	0.00	9.98	0.00	0.00	18.70	942.04
<b>Dollars</b>	4,190,567.15	5,039,595.95	3,601,328.75	2,926,653.00	0.00	0.00	84,250.00	255,082.00	227,418.00	17,657,974.00	361,295.00	0.00	0.00	302,569.15	0.00	0.00	264,246.00	34,910,979.00

**Table 3 - (Montana) Coal Accomplishments in Eliminating Environmental Problems Related to Past Mining Priority 3 and SMCRA section 403(b) Hazards (As of June 30, 2014)**

PROBLEM TYPE (keyword)															
	Bench , Solid Bench, Fill Bench (BE) (acres)	Industrial/Residential Waste Dump (DP) (acres)	Equipment and Facilities (EF) (count)	Gob (GO) (acres)	Highwall (H) (feet)	Haul Road (HR) (acres)	Mine Opening (MO) (count)	Pit, Open Pit, Strip Pit (PI) (acres)	Spoil, Spoil Bank (SA) (acres)	Slurry (SL) (acres)	Slump (SP) (acres)	Water (WA) (gallons)	Other (specify)	Water Supplies (WS) – Section 403(b) (count)	TOTAL
<b>UNRECLAIMED/REMAINING HAZARDS (Unfunded)</b>															
<b>Units</b>				11								100			111
<b>GPRA Acres</b>				11								100			111
<b>Dollars</b>				6750000								1782000			8532000
<b>ANNUAL RECLAMATION - EY2014 only (Completed)</b>															
<b>Units</b>		13.9		22.5					0.1						36.5
<b>GPRA Acres</b>		13.9		22.5					0.1						36.5
<b>Dollars</b>		613910		865136					1750						1480796
<b>HISTORICAL RECLAMATION - EY1978 - 2014 (Completed)</b>															
<b>Units</b>	0.8	104.8	58	164.7	1170	0.5	42	17.8	857.2		18.5	2740.5	14		5188.8
<b>GPRA Acres</b>	0.8	104.8	5.8	164.7	16.71	0.5	4.2	17.8	857.2		18.5	2500	0		3691.01
<b>Dollars</b>	2000	468539	134859	1690625	58008	10000	26395	49954	6758227		36163	800970	141295		10177035

**Table 3A- (Montana) Non-Coal Accomplishments in Eliminating Environmental Problems Related to Past Mining Priority 3 and SMCRA section 403(b) Hazards (As of June 30, 2014)**

PROBLEM TYPE (keyword)															
	Bench , Solid Bench, Fill Bench (BE) (acres)	Industrial/Residential Waste Dump (DP) (acres)	Equipment and Facilities (EF) (count)	Gob (GO) (acres)	Highwall (H) (feet)	Haul Road (HR) (acres)	Mine Opening (MO) (count)	Pit, Open Pit, Strip Pit (PI) (acres)	Spoil, Spoil Bank (SA) (acres)	Slurry (SL) (acres)	Slump (SP) (acres)	Water (WA) (gallons)	Other (specify)	Water Supplies (WS) – Section 403(b) (count)	TOTAL
<b>UNRECLAIMED/REMAINING HAZARDS (Unfunded)</b>															
<b>Units</b>				0	1			1				0			2
<b>GPRA Acres</b>				0	0.01			1				0			1.01
<b>Dollars</b>				0	50000			100000				0			150000
<b>ANNUAL RECLAMATION - EY2014 only (Completed)</b>															
<b>Units</b>		0		5					3.3						8.3
<b>GPRA Acres</b>		0		5					3.3						8.3
<b>Dollars</b>		0		214678					689085						903763
<b>HISTORICAL RECLAMATION - EY1978 - 2014 (Completed)</b>															
<b>Units</b>	0	0	0	0	0	0	188	16.3	12.6		0	0	0		216.9
<b>GPRA Acres</b>	0	0	0	0	0	0	18.8	16.3	12.6		0	0	0		47.7
<b>Dollars</b>	0	0	0	0	0	0	258991	24885	694424		0	0	0		978300

**Table 4\*\*\* – (Montana) Coal Public Well-Being Enhancement  
(All Priority 1, 2, and 3 AML projects completed during EY 2014)**

#	PAD Number	Project Name	Problem Type(s) Reclaimed	GPRA Acres	Cost	Number of People with Reduced Exposure Potential (State Estimated /or/ Census Data)
1	MT000703	Nelson No. 1 and Cottonwood	CSL	10	88,863.00	14
2	MT000705	Anaconda Belt A Anaconda	S	0.5	2323.75	14
3	MT000747	Nelson No. 1 and Cottonwood	S	6	106,933.00	14
4	MT004611	Shoal-Meyer August 2013	S	0.2	8460	5
5	MT004615	Raymond Mine 2013 Maintena	S	5	5000	13
6	MT004615	Raymond Mine 2013 Maintena	S	0.2	2800	13
7	MT049062	2013 Hymer Shaft Stabil. Repos	S	1	178877.8	790
8	MT049067	2014 Waldie Subsidence Recl.	S	0.01	7,100	2
9	MT049068	Kelly & O'Grady Recl. Project	S	0.2	4,700	5
10	MT049068	2014 Kelly & O'Grady Subs. R	S	0.5	1000	5
TOTAL				23.61	406,057.55	875

\*\*\*Query includes Programs Certified 411(h) -1 and Certified 411(h) -2

**Table 4A – (Montana) Non-Coal Public Well-Being Enhancement  
(All Priority 1, 2, and 3 AML projects completed during EY 2014)**

#	PAD Number	Project Name	Problem Type(s) Reclaimed	GPRA Acres	Cost	Number of People with Reduced Exposure Potential (State Estimated /or/ Census Data)
1	MT020004	Forest Rose Mine Recl.Proj.	CSL	30	1,507,000	8
2	MT020004	Forest Rose Mine Recl.Proj.	CS	2.5	223,150	8
3	MT020004	Forest Rose Mine Recl.Proj.	P	0.1	15,300	8
TOTAL				32.6	1,745,450.00	24



**Table 5 – (Montana) - Partnership Financial Resources Dedicated to Protecting the Public from Adverse Effects of Past Mining (AML projects completed during EY 2014)**

#	PAD Number	Project Name	SMCRA Program Funding Source	Total SMCRA funding	Alternate Non-SMCRA Funding Source	Total non-SMCRA Funding	In-Kind Services	Total Project Funding	Comments
1	NRF								
<b>TOTAL</b>				<b>0</b>		<b>0</b>	<b>0</b>	<b>0</b>	

**Table 6 – (State/Tribe) – Reclamation Projects Started and/or Completed (AML projects started and/or Completed during EY 2014)**

Project Type	Projects Started	Projects Completed
<b>State/Tribe (EY 2014):</b>	6	13
<b>Federal (EY 2014):</b>	0	0
<b>Total (EY 2014):</b>	6	13

**Table 7\*\*\*\* – (State/Tribe) – AML Program Grant Awards and Staffing (State/Tribe)  
AML Program Grant Awards and Staffing (During EY 2014)**

<b>AML Program Costs</b>	
Administration	<b>946,695.49</b>
Construction	<b>10,717,189.66</b>
Water Supply Construction	<b>0</b>
AMD Set-Aside	<b>0</b>
Other(s) (Specify)	<b>0</b>
<b>Total AML Funding</b>	<b>11,663,885.15</b>
<b>AML Program Staffing (full-time equivalents on June 30, 2014):</b>	<b>10.3</b>

\*\*\*\*These numbers come from the approved Montana FFY14 - AMLR Consolidated Grant Application.

## VII. Comments

### Appendix A: State Comments and CFO's Responses to the Draft Evaluation Summary Report

The following comments by the MTAML P were relayed to John Ahlbrandt, OSMRE-Casper Area Office, via email transmissions from Autumn Coleman, MTAML P, on October 10, 2014. The CAO's responses follow each comment. All other minor changes/comments/edits requested by the MTAML P were also incorporated into this final Report. The CAO appreciates the input and assistance provided by the MTAML P.

**Table 1. I can only assume that the completed GPRA Acres and Dollars are for the history of the program. Same comment for Table 1A. Perhaps a little explanation of this in the footnote or text would be helpful. Or a note about historical reclamation as is seen in Table 2/2A. If I am incorrect, please let me know. (AFC)**

*That is a correct assumption, and clarifying language has been added to the Table 1 footnote.*

**Table 1A. I see the citation about distinguishing between coal and non-coal for tables 2/2A, 3/3A and 4/4A, but Tables 2/2A and 3/3A are labeled coal and non-coal in their titles, can this just be applied to 4/4A. It is very confusing when reading the document. Also see comment on Table 4/4A below. (AFC)**

*The same notation has been added to Table 4 and 4A Titles to distinguish between Coal and Non-Coal Tables (and to correspond with the format of Tables 1/1A, 2/2A, and 3/3A).*

**Table 2 - My results for Annual Reclamation >Subsidence are 7.61, 7.61, \$210262.00 (KW)**

*Your results are correct and the Table 2 has been corrected accordingly.*

**Table 2A - I ran this query and got results for Annual Reclamation CS, CSL and P. Please re-run the query. I also got different results for Unreclaimed > IRW> 583.40, 610.70, \$459000000.00 (KW)**

*The query was re-run and also came up with Annual Reclamation figures for CS, CSL, and P; which have been entered into Table 2A. The query for Unreclaimed (IRW) was also re-run and the correct numbers you have pointed out have been entered into Table 2A.*

**Table 4A – The following sites should be in Table 4 – Nelson, Anaconda, Nelson, Shal Meyer, Raymond, Hymer, Waldie, Kelly as they were coal projects, the only hardrock projects on the list are the 4 Forest Rose projects. Perhaps they were entered incorrectly? (KW & AFC)**

*By adding Programs: Certified 411(h) -1 and Certified 411(h) -2 to the query, Table 4 now populates to reflect these Projects.*

**Table 6 – We could not replicate this data, the query from eAMLIS does not produce this result set. (KW)**

*This data was compiled both from eAMLIS queries and project summaries provided by the MTAML P.*

**Table 7 – We do not know the source of this data, according to our Annual Performance Report for July 1, 2013 – June 30, 2013 administrative costs were \$561,824.66. (AFC)**

*This data was taken from the approved Montana FFY14 AMLR Consolidated Grant.*