



WESTERN ENERGY COMPANY

A Westmoreland Mining LLC Company
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February 3, 2014

Chris Yde
Department of Environmental Quality
Water Protection Bureau
PO Box 200901
Helena, MT 59620-0901

Permit ID: C1984003B
Revision Type: Amendment
Permitting Action: Deficiency Response - #6
Subject: Amendment App 00184; Sixth Round Technical Deficiencies

Dear Chris:

Enclosed are Western Energy's responses to the deficiency letter dated January 15, 2014.

Please provide more detail on the surface water model used to create tables G-1, G-2, G-3, and G-5. Specifically, state the inputs to the model that were used and how they were calculated. A map or a reference to an exhibit in the permit is also needed as it is unclear how many sub-basins were used, how the streams for the model were calculated or which streams were used, and how the model was constructed. An example can be provided upon request.

Response: Additional information about the development of the model have been incorporated into Appendix G of the report. Two exhibits showing the EFAC premine and postmine drainage boundaries respectively have also been added to the appendix.

The explanation as to why Areas A, B, and C can be analyzed separately from Areas E and D should be included in the text of the PHC.

Response: The following explanation will be added to the text on Page 1.

"This PHC utilizes hydrologic monitoring data from Areas A, B and C in the development and evaluation of PHCs. Data from other areas were not included except where deemed relevant. There is no indication that Area E is hydrogeologically separated from Area B East. However, the groundwater quality and quantity in Area E may be affected by several factors not within the

scope of this PHC, such as: location adjacent to the town of Colstrip and several large impoundments and the occurrence of pre-1976 historical mining (Van Voast et al., 1977)."

P. 36 Section 4.2.4.1 General Water Quality Evaluation: A statement was added to the revised

PHC determination that states: "A sample is considered to represent baseline conditions if it was collected before mining approached within 0.5 miles. There were no samples meeting this criterion for overburden, interburden and sub-McKay wells, as mining started in 1975." Although not numerous, there are water quality samples for these units that were collected and analyzed prior to encroachment of mining within a half-mile. Please check to confirm the statement in the PHC is accurate.

Response: Upon further review of the data, three Area A overburden samples were re-assigned as baseline and Table 15A was updated accordingly. Note that these tables were composed with the available data and location information for the wells at the time the PHC was written.

The text will be revised to: Tables 15A, 15B, and 15C provide statistical summaries of groundwater quality by hydrogeologic unit for mine Areas A, B and C, respectively. A sample is considered to represent baseline conditions if it was collected before mining approached within 0.5 miles. There were only three overburden samples (in Area A) and no interburden and sub-McKay samples meeting this criterion, as mining started in 1975. Table 16 shows the statistical water quality summary of the alluvium.

Figure 23A, Simulated Potentiometric Heads, Pre-Mine Conditions still has the proposed Area F permit outline on it. The data may be used, but the permit outline must be deleted.

Response: Figure 23A has been revised to remove the Area F boundary.

As a suggestion for future documents, a list of acronyms or introduction of the terms an acronym represents (e.g. PHC, TDS) during its first use in a document would be helpful to a reader unfamiliar with commonly used permit acronyms. The acronym "PHC" appears to be used to represent the probable hydrologic consequences determination as well as probable hydrologic consequences of mining and causes confusion. In future documents please use "PHC" to represent the probable hydrologic consequences determination, as that is the most common use of the acronym.

Response: The text has been edited to clarify the use of the PHC acronym. PHC is used to describe the determination (aka, report).

If you have any questions or comments please feel free to contact me as soon as possible (ASAP) so WECO can answer them the expeditiously. (406) 748-5124

Sincerely,



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Enclosures Appendix L – Rosebud Mine A, B, C Comprehensive PHC

cc: Daniel Munoz
Rusty Batie
Wade Steere

Gilbert, Sharona

From: File Transfer Service <no-reply@mt.gov>
Sent: Monday, February 03, 2014 3:44 PM
Subject: State of Montana File Transfer Service

State of Montana File Transfer Service

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

File Name: C1984003B AM 4 6th Rnd Response 2014-02.pdf

Sent From: Dicki Peterson

Message: Attached are the responses to the last deficiency letter for the Area B-East Amendment. Please let me know if you have any questions. Dicki Peterson Permit Coordinator Western Energy Company / Westmoreland Savage Corporation dpeterson@westmoreland.com ?406/748-5124?

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