



August 18, 2014

Mr. Chris Yde, Supervisor
Coal and Uranium Program
Industrial and Energy Minerals Bureau
Montana Department of Environmental Quality
PO Box 200901
Helena, MT 59620-0901

Permit ID: C1979012
Revision Type: Major Revision First Round Response Submittal
Permitting Action: Application
Subject: TR1; First Round Acceptability Deficiency Response

Dear Chris:

The purpose of this letter is to respond to and address Department 1st round acceptability deficiency comments on Spring Creek Mine's (SCM) major revision permitting action known as TR1.

SCM submitted minor revision (MR) 168 on March 2, 2012 which included adding recently lease coal reserves in tracts known as LBM I and LUL in Pit 2. SCM received a June 1, 2012 deficiency letter from the Department which primarily consisted of post-mine topography (PMT) comments. After several PMT revisions and meetings with Department staff, SCM responded to the June 1, 2012 deficiency comments with a revised PMT on November 7, 2012. SCM met with Department staff to discuss the PMT comments and major/minor revision categorization on January 9, 2013. During that meeting the primary concern raised by the Department involved methods used for defining minor tributary drainages. Additionally, SCM received another deficiency letter on February 5, 2013 which focused on methods used for defining minor tributary drainages. SCM responded to the February 5, 2013 deficiency letter addressed on May 4, 2013. SCM received a determination letter stating MR 168 must be resubmitted as a major permit revision on July 30, 2013. SCM also received deficiency comments to the third round submittal on July 30, 2013. SCM responded to the third round deficiency comments on September 30, 2013 as the TR1 Major Permit revision submittal.

On April 1, 2014 SCM received the first round acceptability deficiency response containing 67 comments. SCM appreciated the opportunity to review the draft deficiency responses on May 15 and August 6, 2014 with Department staff. Table 1 below is the index of changes which includes, what was revised for each deficiency comment, a brief description of the change, and a list showing which comment responses have changed since the draft reviews. This letter incorporates comments received from those reviews and serves as a response to those comments.

As discussed with MDEQ personnel, this response also includes a live Word version of the text files with changes accepted to aid in the review of the proposed changes. These live files have the name "accept" at the end of the file name. As is typically done, the submittal also includes a PDF copy showing tracked changes and a live Word version with tracked changes as well. All

file dates for this submittal include the reference "20140531_TR1" for consistency. The submittal maintains the permit electronic file structure with the live and PDF files in each folder. All AutoCAD files contain a major revision filter so all layers changed can be easily viewed.

The following pages list the 67 deficiency comments and responses.

We look forward to working with the Department on this permit revision. Please call me at (406) 757-4236 if you have any questions.

Sincerely,



Gabe Johnson
Environmental Engineer

Enclosures – none

cc: CF 5.2.4 (SCM-14)

Gilbert, Sharona

From: File Transfer Service <no-reply@mt.gov>
Sent: Monday, August 18, 2014 3:20 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: SCM_MJR_REV_TR1.zip

Sent From: Gabe Johnson

Message: Hello, Please see the attached Major Revision TR1 response. Please call me if you have any questions.
Thanks, Gabe

To download this file, login to the [State of Montana File Transfer Service](#).

The Transfer Service uses the ePass Montana sign-on to state online services. First-time public ePass users should click the "**Create an Account**" button when taken to the login page. First-time state employee ePass users should click the "**Montana State Employees**" link.

Replies to this email are not monitored.

transfer.mt.gov