



June 17, 2015

Sent via electronic mail

Mr. Eric Detmer
Spring Creek Coal, LLC
Spring Creek Coal Mine
67 Lakeshore Drive
Decker, MT 59025

Permit ID: C1979012
Revision Type: Major Revision
Permitting Action: Deficiency
Subject: TR1; Third Round Acceptability Deficiency

Dear Eric:

The Department of Environmental Quality (DEQ) has completed its acceptability review regarding Spring Creek Coal, LLC's application for Major Revision TR1. The following deficiencies must be adequately addressed before DEQ can determine the application acceptable:

ARM 17.24.314(3):

Appendix L, Section 4.2.3: "This groundwater generally exceeds ARM guidelines for Class II groundwater and in most cases exceeds values for Class III groundwater". From the data presented, this statement should be changed to Class I and Class II.

Appendix L, Section 4.2.3: "Wells OB-9, AD-14, and 407WA have been omitted from the figures because the values were considered outliers for this analysis." Please explain why these wells are outliers and why their data are being rejected from this analysis.

Appendix L, Section 5.2.2: Well AD-6 is stated to have TDS with a natural variability of 500 mg/L. The data shown on Plate 3 does not support this statement.

Appendix L: Spring Creek has proposed to address comments related to the section analyzing high arsenic levels in some wells completed in burned and partially burned coal and clinker by submitting a separate report that will be attached to the Probable Hydrologic Consequences report. This attachment has not been submitted and the review of the PHC cannot be completed until this additional report is included.

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Upon receipt of satisfactory responses to these deficiencies, DEQ will determine the application to be acceptable.

Please feel free to contact Robert D. Smith at 406-444-7444 with questions regarding this letter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Chris Yde".

Chris Yde, Supervisor
Coal and Uranium Program
Industrial and Energy Minerals Bureau
Phone: 406-444-4967
Fax: 406-444-4988
Email: CYde@mt.gov

C: Jeff Fleischman, Office of Surface Mining
Lauren Mitchell, Office of Surface Mining

FC: 620.403

Gilbert, Sharona

From: Gilbert, Sharona
Sent: Wednesday, June 17, 2015 12:51 PM
To: Eric Detmer (eric.detmer@cldpk.com)
Cc: jfleischman@osmre.gov; lmittchell2@osmre.gov; Gene Hay (ghay@osmre.gov); Giovetti, Debbie (dgiovetti@osmre.gov); mcalle@osmre.gov; DEQCoal
Subject: C1979012 TR1 Third Round Acceptability Deficiency
Attachments: TR1_AcceptabilityDeficiency_Thirdround_06-17-15.pdf

Please see attached electronic correspondence. Have a great day!

Sharona Gilbert

Administrative Assistant
Coal & Uranium Program
Industrial & Energy Minerals Bureau
Ph: 444-4966
Fax: 444-4988

*The best laid schemes o' Mice an' Men,
Gang aft agley ~Robert Burns*