



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

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(406) 748-5100

April 20, 2017

*Sent via ePermit system*

Department of Environmental Quality  
Coal and Opencut Mining Bureau  
1218 E 6<sup>th</sup> Ave  
PO Box 200901  
Helena, MT 59620

Permit ID: C1984003B  
Revision Type: Amendment  
Permitting Action: Deficiency Response #1  
Subject: AM5; Completeness

Dear Chris:

In response to the Department's completeness deficiency letter dated March 28, 2017, the following information has been revised or provided as requested:

ARM 17.24.304(1)(d): The application provides no explanation or evidence for the assertion that no unique scenic or geologic formations or sites are present in Area B, or that no special, exceptional, critical or unique characteristics are present in the permit area or surrounding area. Please include a narrative describing why the area does not contain these features or characteristics.

**Response:** ARM 17.24.304(1)(d) has been revised to include a narrative description.

ARM 17.24.304(1)(e), (f), (f)(i), (f)(i)(A), (f)(ii), and (f)(ii)(A): 17.24.304(1)(f) Hydrologic Information.pdf states a narrative and graphic account of groundwater hydrology and surface water hydrology is provided in Appendix B; however, Appendix B does not contain such an account. Appendix B only contains a justification of why certain data were included in baseline information, and the baseline data. Please include a narrative and graphic account of ground water hydrology to satisfy the requirements of this rule.

**Response:** ARM 17.24.304(1)(e) and ARM 17.24.301(1)(f) have been revised accordingly. Information related to ground water hydrology and surface water hydrology is presented in Appendix O per the deficiencies with hydrologic and geologic baseline data in ARM 17.24304(1)(e). Surface water information and ground water information is presented in Appendix O.

ARM 17.24.304(1)(f)(i)(C): 17.24.304(1)(f) Hydrologic Information.pdf does not address the requirements of this rule. Please include a listing of springs and wells as required.

Response: ARM 17.24.301(1)(f) has been revised accordingly. A listing of all known or readily discoverable wells is presented in Appendix O, Section 4.2.4 and springs is presented in Appendix O, Section 3.2.6.

ARM 17.24.304(1)(f)(iii): 17.24.304(1)(f) Hydrologic Information.pdf states alternative water sources are discussed in Appendix B; however, Appendix B does not contain any information on alternative water sources. Please include a description of alternative water supplies as required by this rule.

Response: ARM 17.24.304(1)(f)(iii) has been revised accordingly. A discussion on alternative water sources is presented in Appendix J Probable Hydrologic Balance per the deficiency for ARM 17.24.304(1)(f)(iii).

ARM 17.24.304(1)(l)(ii)(C), (I), (II), (III), (IV), and (V): The option of "No" was selected in response to the question: "Has any portion of the proposed permit area been previously mined?" The statement requested by this rule is also contained on the Geologic Information screen, under the heading Additional Information. This statement is incorrect because previous mining at the Big Sky Mine occurred within the permit/mine plan area. Please include the relevant information required by sub-rules I through V.

Response: Option "Yes" has been selected and ARM 17.24.304(1)(l)(ii)(C) has been revised accordingly. Historical mining pertaining to Big Sky Mine – Area B permit C1988004B has been included in this section.

ARM 17.24.313(1)(f), (i), and (ii): In "17.24.313(e)&(f) Drainage Basin Reclamation Plan.pdf" Western Energy makes various commitments to meet the requirements of 313(f) and its subsections (i) and (ii); however, the information, plans, and designs to support these commitments could not be located. Please include detailed drainage designs for major channels as described in (i) and typical designs and discussions for all other channels as described in (ii).

Response: Per conversation with DEQ, WECO is currently working on the detailed drainage designs for ARM 17.24.313(f)(i) and the typical designs for ARM 17.24.313(f)(ii). These designs will be submitted during the technical review.

ARM 17.24.524(1), (2), (3), (4), (5), (5)(a), (5)(b), and (6): Signs and markers have not been addressed. ARM 17.24.322 comes up when ARM 17.24.524 is selected.

Response: Please see 17.24.524 in the performance standards. The operations plan is now in-place when 17.24.524 is selected.

Please contact me with any questions comments or concerns.

Sincerely,



Dicki Peterson  
Permit Coordinator  
Western Energy Company  
Rosebud Mine – Area B  
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Enclosures: ePermitting Portal – Rosebud Mine – C1984003B

cc: Rusty Batie

## Gilbert, Sharona

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**From:** Peterson, Dicki L. <[dpeterson@westmoreland.com](mailto:dpeterson@westmoreland.com)>  
**Sent:** Thursday, April 20, 2017 8:46 AM  
**To:** DEQCoal  
**Subject:** C1984003B AM5 Completeness Response  
**Attachments:** C1984003B AM5 Completeness Deficiency Resp 2017-04.pdf

Good Morning –

I submitted the completeness deficiency responses this morning. Please let me know if you have any questions.

Thank you,

**Dicki Peterson**

Permit Coordinator

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