WESTMORELAND

4/30/2025

Ms. Emily Lodman, Acting Supervisor
Coal and Uranium Program
Industrial and Energy Minerals Bureau
Department of Environmental Quality
P.O. Box 200901
Helena, MT 59620-0901

Permit ID: C1985005/MT-0007H
Revision Type: **Bond Release**
Permitting Action: **Response**
Subject: ***Absaloka Mine, SL21; First Round Completeness Deficiency Response***

Dear Ms. Lodman:

Listed below are responses from Westmoreland Absaloka Mining, LLC for First Round Completeness Deficiency on Bond Release SL21, from the letter dated February 29, 2024.

Deficiency 1: ARM 17.24.302(1): *Application SL21 states acreage of 502 acres on the cover letter, as well as on Pages 7 and 16 within the application. The bond release form and vegetation monitoring report indicate 538 acres. Please update the application to the correct area and update the application so the reclaimed areas are consistent.*

Response 1: Westmoreland updated reclamation mapping, including stand boundary adjustments to match disturbance boundaries and reclamation areas more accurately. The acreage data in the bond release application, monitoring report, and maps have been updated to show the SL 21 bond release area comprising 35 stands and a total of 536 acres.

Deficiency 2: ARM 17.24.1116(6)(c)(i)*: Several deficiencies were identified within the statistical analysis of Phase III Null Hypothesis One-sided T-test results. The t*-Values are incorrect. It appears there is a consistent error in the calculation that will need to be addressed.*

Response 2: Erroneous t* statistics values were originally reported in the statistical evaluations within the monitoring report. Sections 3.1.3 and 3.1.4 in the monitoring report have been revised to provide corrected t* values. The revised values do not change the conclusion of the analysis, technical standards were achieved for all land use types and sample years.

The explanation of how relative cover was derived from stratified cover values was insufficient. Please update the report to explain differences in total cover reported in Appendix B1 versus B2.

Response: More detailed descriptions of stratified versus non-stratified data have been added to Section 2.1.2 of the monitoring report. Clarification regarding utilization of data types for Phase III analyses are provided in the monitoring report under Sections 2.2.2 Technical Standards, 3.1 Assessment of Technical Standards, and 3.1.3 Vegetation Cover.

WESTMORELAND

If you have any questions concerning this information, please contact David Kuzara at (406) 281-7954.

Noelle Boyer

Noelle Boyer
Permitting and Regulatory Compliance Analyst
Westmoreland Mining LLC
10375 Park Meadows Drive Suite 400, Lone Tree, CO 80124
Direct: 720-440-6369
Email: nboyer@westmoreland.com

Cc: Jeff Fleischman, Office of Surface Mining Reclamation and Enforcement

Gilbert, Sharona

From: Transfer Service
Sent: Wednesday, April 30, 2025 1:47 PM
To: DEQ AEMD Coal
Subject: State of Montana File Transfer Service

FILE TRANSFER SERVICE

STATE OF MONTANA

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

FILE NAME:	SL21_1_4-30-2025NB.zip
SENT TO:	DEQCoal@mt.gov
SENT FROM:	Noelle Boyer (nboyer@westmoreland.com)

MESSAGE:	Please see the attached Westmoreland Absaloka Mine SL 21Bond release completeness deficiency response round 1. If you have any questions concerning this information, please contact David Kuzara at (406) 281-7954. Thank you, Noelle

To download this file,
click on the link below:

http://transfer.mt.gov/transfer/ReceivedFileReport?TransferID=113e0850-50da-4941-b37f-47dce27a1c5f

Replies to this email are not monitored.

https://transfer.mt.gov/

WESTMORELAND

100 Sarpy Creek Rd.
Hardin, MT 59034
406.226.2250
www.westmoreland.com

January 3, 2024

Dan Walsh
Mining Bureau, Chief
Department of Environmental Quality
1520 East Sixth Ave
PO Box 200901
Helena, MT 59620

Permit ID: C1985005 / MT-0007H
Revision Type: Bond Release
Permitting Action: Submittal
Subject: SL 21; Bond Calculation

Dear Mr. Walsh:

Westmoreland request for a Phase III Partial Release on approximately 502 acres of Absaloka Mine located in Big Horn County, Montana, under Surface Mining Permit No. C1985005 (renewed 01-25-2018) issued by the Montana Department of Environmental Quality (MDEQ) and Federal Permit No. MT-0007H (renewed 01-26-2018) issued by the Office of Surface Mining Reclamation and Enforcement (OSM).

The request is specifically for liability only release of approximately 502 acres for reclaimed lands in the permit area. Present bond liability for Absaloka Mine is $24,180,000.00. The purpose of this bond release request is to document the progress of reclamation by Westmoreland at the Absaloka Mine.

Please contact Noelle Boyer at (720) 440-6369 or NBoyer@westmoreland.com for any questions or concern.

Sincerely,

Garrick Goodheart
Environmental and Engineering Manager
Westmoreland Absaloka Mining LLC
Phone: (406) 748-5139
Fax: (406) 226-2302
Email: ggoodheart@westmoreland.com

Gilbert, Sharona

From: Transfer Service
Sent: Wednesday, January 3, 2024 10:10 AM
To: DEQ AEMD Coal
Subject: State of Montana File Transfer Service

FILE TRANSFER SERVICE

STATE OF MONTANA

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

FILE NAME:	SL 21 Bond Release.zip
SENT TO:	DEQCoal@mt.gov
SENT FROM:	Noelle Boyer (nboyer@westmoreland.com)
MESSAGE:	Hello I am submitting SL 21 Bond Release for Absaloka. I tried to email it but with the CAD files it keeps kicking me back to me with a error message. Please contact Noelle Boyer at (720) 440-6369 or NBoyer@westmoreland.com for any questions or concern.

To download this file, click on the link below:

http://transfer.mt.gov/transfer/ReceivedFileReport?TransferID=c52fdbc4-f823-4fbf-904f-3eb6255a7c06

Replies to this email are not monitored.

https://transfer.mt.gov/