



June 3, 2026

Emily Lodman,
Coal Section, Supervisor
Department of Environmental Quality
1520 East Sixth Ave
PO Box 200901
Helena, MT 59620-0901

Permit ID: C1984003B
Revision Type: Bond Release
Permitting Action: Deficiency
Subject: SL 24; First Round Completeness Deficiency

Dear Ms. Lodman:

In response to the Montana Department of Environmental Quality first round completeness deficiency Bond Release for SL 24 in Area B dated February 2, 2026. Westmoreland Rosebud Mining has the following response.

82-4-232(6)(a), MCA: Please include the full list of landowners for Rosebud Coal Mine Area B, not just the sections for bond release. DEQ would like to include all landowners to ensure coverage for the release area.

MCA82-4-232 (6) (a) (i) The permittee may file an application with the department for the release of all or part of a performance bond. The application must contain a proposed public notice of the precise location of the land affected, the number of acres for which bond release is sought, the permit and the date approved, the amount of the bond filed and the portion sought to be released, the type and appropriate dates of reclamation work performed, and a description of the results achieved as they relate to the permittee's approved reclamation plan. The description of the results may include other information or methods, including predictive modeling, which may be used in conjunction with monitoring data compiled for the performance bond release application to demonstrate compliance with the approved reclamation plan.

(ii) As part of any bond release application, the permittee shall submit copies of letters that the permittee has sent to adjoining property owners, local governmental bodies, planning agencies, and sewage and water treatment authorities or water companies in the locality of the operation, notifying them of the permittee's intention to seek release from the bond.

WRM has included the landowners directly surrounding the parcels being sought after for bond release. If DEQ is looking for a complete list of landowners within the permit boundary, WRM would point them to the updated list of landowners found in the permit.

After review of the permit boundary against Montana Cadastral WRM only missed the State of Montana, as WRM is the lease holder the address is the same as the Rosebud mine, leading to WRM having already met this deficiency.

82-4-232(6)(b)(i), MCA: Please include an earthwork volume calculation which demonstrates the earthwork done in the bond release areas since the last submitted annual bond calculation.

MCA82-4-232 (6) (b) The department shall determine whether the application is administratively complete. An application is administratively complete if it includes: (i) the location and acreage of the land for which bond release is sought; The location and acreage of the land for which bond release is being sought can be found on the maps included in the submittal as well as the application. Specifically, the physical location is described in the application attachments #1 – Legal Description down to the ¼ section as necessary.

ARM 17.24.1111(3): The amount of acres requested in the application does not align with calculated acres based on the field polygons provided. Please correct the requested acres and resubmit.

The acres have been updated on the maps, application and additional documents.

ARM 17.24.1116(6)(a): The 27.0 ac field and 36.0 ac field have areas that exceed 10 ft from current postmine topography (PMT) requirements and will need additional backfill and grading to tie into adjacent fields; please explain how these fields will tie into adjacent fields or grade them accordingly to better match the currently approved PMT.

The 36.0 ac field has been removed from the application for further analysis. Regarding the 27 ac field, WRM has traditionally been able to make minor modifications to the Approximate PMT, the area being applied for is an adjustment between the ability to modify and DEQ holding the operator to the approved Approximate PMT. In order to tie into the reclamation approved within SL19, adjustments were required. These adjustments include addition of a tertiary drainage and elevation modifications. As work progresses to the south, WRM will continue to make minor changes to meld with the approved PMT.

ARM 17.24.1112(d): The \$20.5M bond release listed on the cover page of the application does not match the \$4.32M bond release listed to be sought on the public notice. Please revise and re-submit.

The change has been made to the public notice that it was not found to be incorrect in any other location.

ARM 17.24.1112(d): Please update the legal description for Section 18, T1N. The Range is R41E, not R40E. Please ensure portions of the application with the legal descriptions are updated accordingly.



The change has been made to the public notice, it was not found to be incorrect in any other location.

ARM 17.24.1112(d): The specific name of the local library should be included in both the public notice and the landowner letters. Please update these to include the name of the local library.

The 'local library' has been changed on the public notice and the landowner letters to 'Bicentennial Library – Colstrip'.

If you have any questions, please contact Tim Garvin at 406-748-5153.

Sincerely,

Westmoreland Rosebud Mining LLC

Wade Steere, *Environmental Permitting Manager, Rosebud Mine*

PO Box 99 | Colstrip, MT 59323

Mobile: 406-839-8189 | Office: 406-748-5110

Email: wsteere@westmoreland.com | Website: www.westmoreland.com

Gilbert, Sharona

From: Transfer Service
Sent: Wednesday, June 3, 2026 3:12 PM
To: DEQ AEMD Coal
Subject: State of Montana File Transfer Service

Categories: Orange Category

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 24 Westmoreland Rosebud Mine Area B Bond Release Completeness Deficiency Response.zip
SENT TO:	DEQCoal@mt.gov
SENT FROM:	Noelle Boyer (nboyer@westmoreland.com)
MESSAGE:	Please see the attached SL 24 Westmoreland Rosebud Mine Area B Bond Release Completeness Deficiency Response

**To download this file,
click on the link below:**

<http://transfer.mt.gov/transfer/ReceivedFileReport?TransferID=3faa220c-cbe7-4ebd-a2ef-d613c0048d55>

Replies to this email are not monitored.



December 4, 2025

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

Permit ID: C1984003B
Revision Type: Bond Release
Permitting Action: Submittal
Subject: SL 24: Phase I

Dear Ms. Lodman:

Westmoreland Rosebud hereby submits bond release application SL24 for partial release of approximately 144 acres Phase I bond release within Area B of the Rosebud Mine.

Westmoreland Rosebud Mining is requesting \$20,500,000.00 to be released. \$66,150,000.00 will remain held by the DEQ for the Area B permit.

If you have any questions, please contact Tim Garvin at 406-748-5153.

Sincerely,

David Kuzara

Manager, Environmental & Regulatory Affairs
1601 Lewis Ave., Suite 112 Billings, MT 59102
Direct: (406) 281-7954 | Mobile: (406) 690-9069
Email: dkuzara@westmoreland.com |

Enclosure: C1984003B SL24 Phase I App.pdf

From: Transfer Service
Sent: Thursday, December 4, 2025 10:26 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:	C1984003B SL24 Phase I Bond Release 12-2025.zip
SENT TO:	DEQCoal@mt.gov
SENT FROM:	Noelle Boyer (nboyer@westmoreland.com)
MESSAGE:	Please see the attached C1984003B SL24 Phase I Bond Release 12-2025 Let me know if you have any questions, Noelle Boyer

**To download this file,
click on the link below:**

<http://transfer.mt.gov/transfer/ReceivedFileReport?TransferID=5280d049-51a6-4c7e-b85c-1b71340075b3>

Replies to this email are not monitored.

<https://transfer.mt.gov/>