



Public Service Commission

State of North Dakota

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November 13, 2008

Mr. Richard A Southwick
Vice President - Permitting & Environmental
Great Northern Power Development L.P.
173 Cottonwood Road
Townsend, MT 59644

Dear Mr. Southwick:

The Reclamation Division has conducted a completeness review of South Heart Coal, LLC's application for Surface Coal Mining Permit Application No. SHSH-0801 for the South Heart Lignite Mine in accordance with NDAC 69-05.2-05-01(2). The following items must be satisfactorily addressed before the Reclamation Division can deem the application complete.

GENERAL

1. The permit application needs to be reformatted so that the information is presented clearly and concisely (NDAC 69-05.2-05-02). Presently, it is very difficult to find information in the permit application. The table of contents and body of the application need to contain hyperlinks for every section, subsection, table, figure and appendix listed. The software used to open and view every file type included in the application must either be included in the application or links to websites must be provided where the appropriate free software can be downloaded. Also, we recommend that many of the sections be broken down into separate PDF files and include the tables and many of the appendixes within that section. Having as much information as possible within the same section will reduce the need to "hunt" for information. For example, haulroads are discussed in Section 3.1.2.2, Section 3.1.2.7, and then again in Section 3.5 and in the appendixes, tables, and figures. Some items may have been missed or overlooked because of the current format, not to mention slowing down the review process to see if all of the required information is included. Please consolidate the information into a logical order that is much easier and quicker to review. (GAW & MDB)
2. Throughout the permit application, maps for the proposed permit area and extended mine area are usually subdivided into a series of three sheets, typically Figures A, B and C. However, the proposed permit area is usually depicted on one of the figures, most often Figure B. We recommend placing the entire extended mine plan area on one consolidated sheet rather than breaking this area into three sheets. Also, it needs to be made more clear which figure contains the actual area covered by the application for Permit SHSH-0801. If an alternate map scale is needed, the Commission may approve requests for map scale

changes [NDAC 69-05.2-05-02(5)(b)]. Also, the scale of the maps should be listed for the designed print size, which should be less than 36 inches wide. NDAC 69-05.2-08-02. (GAW)

Second DVD – Appendix A

3. All aspects of the permit application, including the groundwater model input files of Appendix A need to be available for public viewing and comment. Please provide software with an executable file that can be easily installed in order to view Appendix A by the general public. Also, please include an instructional tutorial for establishment of a working directory in Groundwater Vistas and provide the various background maps for the groundwater flow model input files. (BEB)

Section 1.0 – Introductory, Legal, Financial, Compliance, and Related Information

Appendix 1.1-1 – Application Form

4. A copy of the metes and bounds description of the proposed area needs to be attached to the permit application form as indicated in the first paragraph of the form. (SAS)

Section 1.2 – Legal Information

5. Section 1.2.1 states that a permit area of 273.5 acres was used to develop the disturbance areas and other calculations even though the permit area as described in the metes and bounds is 274.5 acres. Please make the appropriate changes to all tables, figures, etc. to reflect the actual acreage in the permit application. (SAS)

Appendix 1.2-3 – Notice of Filing...Operations

6. Please update the proposed Newspaper Notice, Appendix 1.2.3, as follows so it complies with NDCC 38-14.1-18 and NDAC 69-05.2-10-01: (GAW & SAS)
 - a. Include the applicant's name and business address.
 - b. State that the proposed permit area contains 274.5 acres rather than 273.5 acres.
 - c. Revise the advertisement to include notice to any person with an interest which is or may be adversely affected that a petition to designate an area as unsuitable for surface coal mining operations that is within the proposed permit area must be filed within thirty days of the last publication of the notice as required by NDCC 38-14.1-18(1).
 - d. Since it appears mining activities will be conducted within 100 feet of the right-of-way of the north-south public road on the east side of the proposed permit boundary, a statement to that effect needs to be included in the notice as required by NDAC 69-05.2-10-01(1)(d).
 - e. Revise Figure 1.2-1, Newspaper Notification Map, as follows:
 - i. Identify the proposed permit boundary more clearly (it may be confused with the extended mine plan boundary if not in color and properly scaled, perhaps the extended mine plan boundary should be removed);
 - ii. Label the City of South Heart, Highway 10 and 4th Street more clearly;
 - iii. Increase the font size of the Section, Township and Range numbers; and
 - iv. Consider removing the contour lines from the map to improve clarity.

Section 1.3 – Business Information, Identification of Interests and Right of Entry

7. Section 1.3.3 on page 4 indicates that the directors of SHC are listed in Table 1.3-1; however, no persons listed in the table are shown as directors, only the officers are listed. The list of corporate directors also needs to be provided. If the listed officers are also the only directors of SHC, please add another line to indicate that in the table. Also, Section 1.3.3 needs to include the names and addresses of every officer, manager, partner, director, governor or person performing a function similar to a director as required by NDCC 38-14.1-14(1)(e) and NDAC 69.05.2-06-01(1). (SAS & GAW)
8. Please provide the name and address of any person owning a record of ten percent or more of any class of voting stock or membership interests of the applicant as required by NDCC 38-14.1-14(1)(e) and NDAC 69.05.2-06-01. (GAW)
9. Please provide the ownership and control information for all the “owners and controllers” of South Heart Coal, LLC. Ownership and control information is provided for South Heart Coal, LLC; however, Figure 1.3-1 indicates South Heart Development LLC, Great Northern Power Development LP, Allied South Heart, LLC and Allied Syngas Corporation are all owners and controllers of South Heart Coal, LLC. Therefore, the information required by NDAC 69-05.2-06(1)(e) & (f) must be provided for these companies. (DKM)
10. There are several names listed on **Exhibit “A”** of the lease document but no signature page has been included for them. Please include signature pages for Robert K. Johnson, Dorothy Luptak, Richard H. Johnson, and Phoebe Kostelecky Leo. In addition, the signature page included for Robert Erdahl is not signed or notarized; therefore, please include a signed copy. (SAS)
11. The coal ownership information states that the coal owned by the estate of Lewie and Ellen Kostelecky has been executed by their heirs. Please add a statement indicating the people that executed these leases and include a copy of the lease signature page that they signed. (SAS)
12. Signature pages for Susan K. Sagun, Debra K. & Thomas A. Courson, and Keith F. & Susan E. Kostelecky are included but not listed on **Exhibit “A”**. Please explain. (SAS)
13. Please list all owners for Tract S-1399827-A as required by NDCC 38-14.1-14(1)(c)(2) on the pdf page that opens when clicking on the ID numbers. (SAS)
14. Based on the Coal Lease and Surface Use Agreement in Appendix 1.3-1 and 1.3-2, it is difficult to determine if enough coal leases (at least 75% of the coal rights) have been secured by SHC in order for the Commission to issue the mining permit. For Tract C-1399822-A, Donald Degel and Rosemarie A. Vetter are both listed as 10% coal owners; however, there are no leases with these individuals. Also, the listing for Tract C-1399822-A indicates that C.J. and Phyllis Perdaems jointly own 20% of the coal. However, the consent document (surface and coal lease) was only signed by C.J. Perdaems. For Tracts C-1399822-B and -C, the lease with Robert Erdahl, Jr. is not signed and there are not leases for the following coal owners: Dorothy Luptak, Karla H. Erdahl, Susan Willer, Maragery A. Taylor, or Michael R. Price. In addition, there is no coal lease with the Estates of Lewie and Ellen Kostelecky even though Appendix 1.3-2 indicates that Lewis Fredrick Kostelecky and Phoebe K. Leo have executed leases as heirs for these tracts. However, neither of these persons has signed leases. The Will of Phoebe K. Leo is included in the Coal Lease and Surface Use Agreement;

however, nearly all of the text has been removed for privacy reasons and one cannot make a determination if it grants the right to mine this tract. Please provide an explanation if the name of the coal owner is different than the person who signed the coal lease. Additional information is needed so the Commission can determine if SHC meets the definition of a “mineral Developer” under NDCC 38-18-05. (DKM & SAS)

15. With one surface/coal lease covering the entire permit area, it is extremely difficult to cross reference the information given in Appendices 1.3-2 and 1.3-3 to determine if SHC has the right to mine as indicated in the above deficiencies. Additionally, there is no listing of the coal lease documents in the application other than going to the hyperlinks in Appendices 1.3-2 and 1.3-3. The following changes will help expedite the review of the right of entry information: (SAS)
 - a) For each surface and coal owner who has signed a lease, please indicate the page number of the signature in the coal leasing document, and
 - b) Attach the surface/coal lease documents in a format that is easier to find, such as another appendix.

Section 1.5 – Other Compliance Information

16. Section 1.5.4 includes a listing of other permits and licenses needed for the mining operation but no statement is provided in this section or shown in Table 1.5-1 indicating if South Heart Coal has submitted these applications and which, if any, have been approved. Please include all of the other permits and licenses information that is required by NDAC 69-05.2-06-04. (SAS)
17. Although Section 1.5.5, Relationship to Areas Designated Unsuitable, states that surface coal mining operations are not within 500 feet of any occupied dwelling, Figure 3.2-1a indicates otherwise. Please review and clarify if the proposed permit area is within 500 feet of any occupied dwelling or if any mining operations will be within 500 feet of an occupied dwelling. Please identify the 500 feet buffer zone around the occupied dwellings on the Pit Layout and Facilities Map, Figure 3.1-1. If necessary, please provide written waivers from owners of occupied dwellings consenting to any surface coal mining operations within 500 feet of such a dwelling as required by NDAC 69-05.2-04-01.4. Also, we recommend adding a statement in this section to indicate whether or not the proposed coal removal area will come within 500 feet of any farm building. (Please refer to NDCC 38-18-07(2) on special provisions for farm buildings.) (GAW & JRD)
18. Section 1.5.5, Relationship to Areas Designated Unsuitable, mentions that the haulroad will join the public road on the north side of the proposed permit area. However, based on the Pit Layout and Facilities Map, Figure 3.1-1a, it appears mining related activities may come within 100 feet of the public road right-of-way on the east side of the permit boundary. If that is the case, please address plans to obtain approval from the road authority and the Commission as required by NDAC 69-05.2-04-01.3. (JRD)
19. While each section of the permit includes a statement of the persons and entities that prepared information in that section, we recommend adding a separate part in Section 1.5 to list all entities and/or persons who prepared or who consulted in preparing this application as required by NDAC 69-05.2-05-02(3). (SAS)

Section 2.1 – Cultural Resources

20. Please provide a copy of the cultural resource inventory report as required by NDCC 38-14.1-14(1)(u). This should be included as a part of Section 2.1 of the permit. Also, please include a copy of the SHPO letter of acceptance of the final inventory report as the letter in Appendix 2.1-1D states that the report will be acceptable once the recommended changes have been made. (BEB & DKM)

Section 2.3 – Geology

21. Based upon field studies that include geophysical logging, and laboratory chemical analysis of overburden, coal seams, air quality and groundwater within the study area and in consideration of general public knowledge of the presence of uranium, and molybdenum and/or other radioactive or heavy metals or minerals associated with the general vicinity of the proposed South Heart Lignite Mine permit area, please provide a discussion based on collected data and analysis of the occurrence of these or any other potentially toxic and/or radioactive substances in the appropriate sections of the permit application in compliance with NDAC 69-05.2-08-04(4) and (5). (BEB)
22. Appendix 2.3-12A represents 2002 Lithologic Logs within the Study area and is appropriately labeled in the cover page Table of Contents; although the Section 2.3 Geology List of Appendices labels this section as being Shallow Overburden Laboratory Data Sheets. Please correct. (BEB)
23. Please incorporate numbers that are correlative with the isopleth contours that represent the coal seam thickness of the HT Butte Coal Seam of Figure 2.3-5, the E1 Coal Seam of Figure 2.3-8, the E Coal Seam of Figure 2.3-9, and the F Coal Seam of Figure 2.3-10. (BEB)
24. Please incorporate numbers that are correlative with the isopleth contours that represent structure contour of the HT Butte Seam of Figure 2.3-11, the E1 Seam of Figure 2.3-13, and the E Seam of Figure 2.3-14. (BEB)
25. Figure 2.3-21 which represents Current and Historic Boreholes with Lithologic Logs does not display when the file is opened. Please enable or repair the link. (BEB)
26. As required by NDAC 69-05.2-08-02(d), please add ground surface elevations to the Drill Hole Location maps for Figures 2.3-23 and 2.3-24. (BEB)
27. As required by NDAC 69-05.2-08-05(2)(c)(4), please incorporate the percentages of sand, silt, and clay into the description of textural properties of the overburden analysis data as presented in Appendix 2.3-6A and 2.3-6B. (BEB)

Section 2.5 – Ground Water Hydrology

28. We understand that sandstone lenses and coal stringers in the overburden appear to be somewhat discontinuous, but nonetheless they also appear to be hydraulically isolated from the D Coal and each other. Please provide additional potentiometric surface maps with the permit application as required to comply with the provisions of NDAC 69-05.2-08-06(d) for those individual and discrete aquifer zones or hydrostratigraphic units within the defined upper and lower aquifer systems in order to assess water level trends from baseline through

final reclamation and beyond, for all distinct aquifers within the aquifer systems. Please provide separate potentiometric surface maps for the D Coal seam, for all confined aquifers above the D Coal seam to include any water bearing coal stringers, and provide a contour map showing the water table elevation within the proposed permit area to include overburden wells, and a separate potentiometric surface map to represent static water levels of underburden wells, and if sufficient information is available from the HT Butte Coal seam. On the potentiometric surface maps, please include the location and particular nomenclature of specific monitoring wells for which the water level data for the maps was derived, e.g. SHMW-06C, 06D, etc. as opposed to SHMW-06. (BEB)

29. As required by NDAC 69-05.2-09-12(1)(d), please provide a plan in the Ground Water Hydrology narrative of Section 2.5 for restoring the approximate recharge capacity of the permit area in association with the Hydrologic Reclamation Plan as described in NDAC 69-05.2-16-15. (BEB)
30. Please provide a discussion of locally-termed *black water* and *white water* in the narratives of the water quality data for wells completed in coal seams of both the upper and lower aquifer systems describing the presence or absence of black water within the proposed permit and adjacent areas. (BEB)
31. Please incorporate into the Ground Water Monitoring Plan of Section 2.5.7 a discussion of post-mining reclamation monitoring wells that will be installed at least into the base of spoils and into the first aquifer below the lowest coal seam to be mined. (BEB)
32. To supplement Appendix 2.5-5 and Table 2.5-2 and in compliance with NDAC 69-05.2-08-06(1)(c), please expand the narrative discussion in Section 2.5 outlining procedures and methodology of aquifer testing that was conducted to obtain the hydrologic data presented in the table and appendix. Please include a protocol discussion of the slug testing procedures and constant rate testing procedures that were conducted, the length of tests for the various methods, equipment usage, and a discussion of analytical software used in determining the various hydraulic properties of the aquifers tested such as hydraulic conductivity, transmissivity, etc. (BEB)
33. To supplement the submitted figures representative of predicted HT Butte and D Coal drawdown after the various mining periods, please indicate if similar drawdown maps representative of the underburden sandstone aquifer (Layer 5) can be generated and submitted. This is requested since it appears this hydrostratigraphic unit represents a relatively consistent aquifer across the model boundary and will be considered the next lowest aquifer immediately below the lowest coal seam to be mined within the mine plan and adjacent areas. (BEB)

Section 2.6 – Surface Water Information

34. Appendix 2.6-2 represents water chemistry data for the four surface water sites that were tested and the appendix heading indicates that radioactivity is included in the suite of parameters tested for water quality, although there are no measures of radioactivity presented in the tables of the appendix. Please correct or explain. (BEB)

Section 2.7 – Pre-Mining Land Use and Vegetation

35. Please include a map that shows the pre-mining land uses with the mapping units for each land use within the proposed permit area as required by NDAC 69-05.2-08-08(1)(a). A pre-mine land use map and a soils mapping unit map are included, Figures 2.4-2B and 2.7-1-2B, respectively, but this information needs to be combined on one map to determine the mapping unit acreages by landowner. The mapping units for cropland and tame pastureland are the soil mapping units. The mapping units for woodlands is woodland type (trees, tall shrubs & low shrubs) and for wetlands the wetland class or classification system. This information should be discussed in the narrative portion of the permit, Section 2.7, and the appropriate maps should be referenced. NDAC 69-05.2-08-08. (GAW)
36. Please include woodlands and wetlands as pre-mine land uses in Section 2.7.1.4. Table 2.7.1-1B shows that these land uses are present in the proposed permit area but there is no mention of their existence in the Pre-Mining Land Use and Vegetation Section of the permit. In addition, stockponds and dugouts are considered developed water resources in the post-mine setting (NDAC 69-05.2-23-02) so they should be classified as such in the pre-mine setting rather than as reservoirs under other land uses. NDAC 69-05.2-08-08. (GAW)
37. In Section 2.7.2, please include a detailed narrative describing the nature and variability of the vegetation in each mapping unit and land use category in the proposed permit area. This would include cropland, tame pastureland and woodlands (wetlands -Section 2.10). The data presented in Section 2.7.2.3.2 currently summarizes information for the whole study area. NDAC 69-05.2-08-08(c). (GAW)
38. In Section 2.7.2, please include a detailed description of the number and arrangement of trees and shrubs, probable age of trees, height of trees and characteristics of understory vegetation for each woodland type (trees, tall shrubs and low shrubs) within the proposed permit area. Some information pertaining to woodlands is included in Section 2.7.2.2.1 but it is characterized as an NRCS native grassland ecological site. NDAC 69-05.2-08-08(1)(c)(4) & (d). (GAW)
39. Please provide an assessment of the productivity of the tame pastureland within the proposed permit area based on published data or quantitative data. Provide information regarding the dominant species and their relative proportions. NDAC 69-05.2-08-08(c) and PSC Pre- and Post-Mining Vegetative Assessments document. (GAW)
40. Please include a narrative description which includes information adequate to predict the potential for reestablishing vegetation on all areas to be disturbed as required by NDAC 69-05.2-08-08(4). (GAW)
41. The appendix for Section 2.7.1 contains the information for the cropland soil type by landowner within the extended mine area but not within the permit area as required by NDAC 69-05.2-08-08(1)(c)(1). Please provide this information for the proposed permit area. (SAS)

Section 2.10 – Wetlands

42. In Section 2.10, Wetlands, please include the following for sampled wetlands located in the proposed permit area:

- a. Water quality data for the wetlands that shows an analysis of the major cations and anions and specific conductance in addition to the parameters listed in Table 6.4-1.
 - b. A description of the vegetation zones or plant communities, identified by ecological dominant or co-dominant species, through the use of a line drawing (or photographs) of appropriate scale. A discussion of the succession phase should be included in instances where the wetland has been disturbed and altered by land use management.
 - c. A species list for each vegetation zone or plant community (wetland mapping unit), which includes dates evaluated.
 - d. A narrative describing the relationship among vegetation, soils and surface groundwater hydrology in the wetlands as well as observed or historical anthropomorphic use. PSC Pre- and Post-Mining Vegetative Assessments document. (GAW)
43. In Section 2.10, Wetlands, please include a narrative discussing any temporary wetlands in the proposed permit areas and list the land use and crop normally grown if tilled as required by Section II-H-6, ND PSC Pre-and Post-Mining Vegetative Assessments document. (GAW)
44. In Section 2.10, Wetlands, please include a detailed narrative describing the nature and variability of the vegetation in each wetland mapping unit in the proposed permit area. The data presented in Section 2.10 contains information for the whole study area. NDAC 69-05.2-08-08(1)(d). (GAW)

Section 3.1 – Operation Plan - General

45. Please clarify if surface coal mining operations will be within one hundred feet of the outside right-of-way line of a public road. It appears that the diversion that is to be placed around the overburden stockpile may be within 100 feet of the right-of-way for the north-south county road along the eastern permit boundary. If so, please include documentation of the necessary approvals from the authority with jurisdiction over the road. NDAC 69-05.2-04-01.3. (GAW)

Section 3.1.2.3 – Topsoil Removal

46. As required by NDAC 69-05.2-09-11(5), the volumes of suitable plant growth material must be described by ownership based on the soil survey. Ownership volumes are provided in Table 3.1-5, but the table does not appear to accurately describe the topsoil and subsoil volumes, and the topsoil thicknesses appear to exceed the depths described on the soil survey maps. Please correct the table to accurately describe the topsoil and subsoil volumes by ownership. (WTG)
47. As required by NDAC 69-05.2-08-11, where the applicant proposes to use other suitable strata as a supplement for suitable plant growth materials, the application must indicate the areal extent of other suitable strata within the proposed permit area, and must provide results of the suitable strata analyses. The use of suitable strata within the disturbance area to satisfy potential suitable plant growth material shortfalls is described in Sections 3.1 and 4.1, but the location of shallow overburden boreholes and analysis of the overburden are discussed in Section 2.3. Please combine the discussion of other suitable strata with that of the removal, storage, and redistribution of suitable plant growth material, as required by NDAC 69-05.2-

09-11(5), and provide sufficient detail of the suitable strata to meet the requirements of NDAC 69-05.2-08-11. (WTG)

Section 3.3 – Blasting Plan

48. The narrative of the blasting plan, Section 3.3, needs to include a statement that pre-blast surveys that are requested by nearby property owners will be completed before any blasting occurs. (MDB)
49. The blasting map in Section 3.3 should depict a setback around protected structures where blasting is not allowed. For example, a 500 foot setback should be marked around the outside of the residences as required by NDAC 69-05.2-09-04(8)(a). (MDB)
50. In Section 3.3, please add a statement saying that all blasting activities will be conducted by a certified blaster as required by NDCC 38-14.1-24. (MDB)
51. The following information must also be included in the blasting record discussion in Section 3.3 as required by NDAC 69-05.2-09-04. (MDB)
 - a. Maximum weight of explosives allowable in an 8 millisecond delay;
 - b. Actual weight of explosives used within an 8 millisecond delay;
 - c. Actual number of holes detonated within an 8 millisecond delay; and,
 - d. A sketch of the blast pattern, including number of holes, burden, spacing, decks and delay pattern.
52. The types, capabilities, sensitivities of blast monitoring equipment and procedure need to be included in Section 3.3 as required by NDAC 69-05.2-09-04(4). (MDB)

Section 3.5 – Transportation Facilities

53. As required by NDAC 69-05.2-09-06(1) and 69-05.2-24-03(5)(a), please provide additional calculations for the culverts described in the haulroad section, Section 3.5. Estimated flows are provided; however, it is not shown how these values were calculated. (MDB)
54. The original stamped, signed P.E. certification for the haulroad designs needs to be submitted. Also, according to the ND Board of Registration website, Mr. Hitt's registration number is PE-2442, not PE-2445. Please revise Section 3.5 accordingly. NDAC 69-05.2-09-06(2). (MDB)

Section 3.6 – Surface Water Management

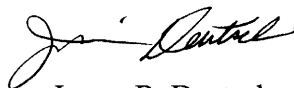
55. In Section 3.6, Surface Water Management, please provide calculations for the sedimentation pond and diversion to show the pond has adequate capacity for runoff storage and that the spillway and diversion can adequately handle the flows according to NDAC 69-05.2-09-09(2)(c) and NDAC 69-05.2-09-09(2)(i). (MDB)
56. In Section 3.6, please provide the calculations for sediment storage as required by NDAC 69-05.2-09-09(2)(d) and 69-05.2-16-09(2). (MDB)
57. In Section 3.6, please provide a detailed dimensional drawing of the impoundment as required by NDAC 69-05.2-09-09(2)(e). (MDB)

Section 4.1 – Reclamation Plan

58. In Section 4.1, please provide a plan for the redistribution of SPGM, particularly the method that will be used to predict the SPGM respread thickness (Policy Memo #17 method 1 or 2). The narrative in Section 4.1.1.1 infers that method 2 will be used. If so, please provide a map depicting the projected respread thicknesses based on the projected graded spoil quality. NDAC 69-05.2-09-11. (WTG & DKM)
59. In Section 4.1.4, Performance Bond, please update the numbers in the narrative and tables for the cost per hour of equipment and cost of seed and trees to be consistent with Policy Memo 16. The equipment and rates in the 2008 variable costs updated for Policy Memo 16 must be used to calculate the worst case bond. Rates are updated annually by the Reclamation Division and cannot be substituted. (MDB)
60. Appendix 4.1-1, Table 1, indicates an Incremental Bond amount. However, a worst case reclamation scenario was used to calculate the proposed bond amount that considers the initial 5-year term of permit. Please delete the reference to incremental bonding. (MDB)
61. On the worst case bonding map, please identify and label Pits 1, 2, and 3. This labeling is needed to compare the mining and reclamation schedule to the tables in Appendix 4.1-1 for determining the work that will need to be done when the worst-case scenario occurs in 2013. (MDB)
62. Since haul distance and push distances vary, production rates also vary, causing the total hours to vary as well as the cost per cubic yard in the reclamation of lands. Please recalculate the worst case bond amount, Section 4.1.4, on a per hour basis, not a cubic yard basis. (MDB)
63. Based on our preliminary review of the Post-Mining Topography Maps, Section 4.1, several issues need to be corrected at this time. (MDB)
- a. The Post-Mining Topographic Map (Figure 4.1-7) and the Post-Mining Area Slope Map (Figure 4.1-9) use different contour lines indicating two completely different post-mining topographies. The post-mining topography on both of these maps should be the same.
 - b. The post-mining topography shows changes to topography in areas that are not proposed for mining. Some areas may be associated disturbances, but these activities should not change the topography in this area.

If you have any questions, please contact this office.

Sincerely,



James R. Deutsch
Director
Reclamation Division