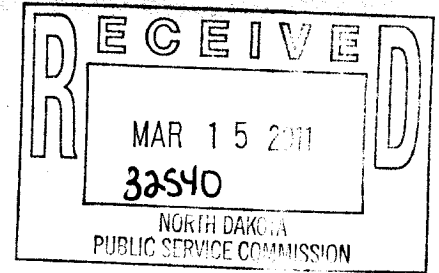


**BADLANDS CONSERVATION ALLIANCE**  
A VOICE FOR WILD NORTH DAKOTA PLACES

**Badlands Conservation Alliance**  
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Bismarck, ND 58501  
701-255-4958 badlandsconservationalliance.org



March 12, 2011

ND Public Service Commission  
600 E Boulevard Avenue, Dept. 408  
Bismarck, ND 58505-0480

RE: South Heart Coal, LLC / Case No. RC-10-77 / Permit SHSH-1001

Dear Commissioners:

Badlands Conservation Alliance is a non-profit organization focused on protection and preservation of public lands and natural resources in western North Dakota. We are submitting comments on the application for Surface Coal Mining Permit SHSH-1001 by South Heart Coal, LLC as regards its proposed South Heart Lignite Mine.

Given the history of changing scenarios proposed for the South Heart site by Great Northern Power Development and its subsidiaries, it remains unclear as to the extent of detrimental impacts to Theodore Roosevelt National Park, the Little Missouri National Grasslands, and the gateway community of Medora, North Dakota's #1 tourist destination.

The ongoing industrialization of western North Dakota's landscape invariably applies pressure on the value and quality of these public lands. Acknowledged public values and economic benefits as represented in wildlife protection, recreational use, hunting, and tourism will be diminished by this proposal.

It is also true that this fragmentation will draw an ever tighter noose around the operation of ranching and agricultural communities: increasing traffic, threatening water and air quality, increasing stress, and impacting human health.

Furthermore, BCA questions the wisdom of permitting a mine without full disclosure as to final purpose. Economics do not present a positive gain for a mine as a stand-alone project, either for the company or to the community. BCA believes the Company owes the public full disclosure as to the final destination of South Heart coal, and that the ND Public Service Commission cannot make a satisfactory ruling on this permit until such obligation has been met. The release of methane during strip mining and the production of carbon dioxide upon combustion of South Heart coal cannot be fully weighed without such knowledge. South Heart lignite is outranked by neighboring Powder River Basin coal in both BTUs and monetary worth. This non-competitive scenario does not warrant significant loss to communities or to unique public lands.

Badlands Conservation Alliance requests an informal conference to be held in the vicinity of the proposed action to address the concerns of the public, and specifically our membership. Clarification is needed not only as regards local opposition, but as regards the proposed and cumulative negative impacts to Theodore Roosevelt National Park.

Respectfully,

A handwritten signature in black ink that reads "Jan Swenson". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Jan Swenson, ED  
Badlands Conservation Alliance