



Public Service Commission

State of North Dakota

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March 13, 2014

Mr. D. Randall Crooke
Environmental Manager
Falkirk Mining Company
P.O. Box 1087
Underwood, ND 58576-1087

Dear Mr. Crooke:

The Reclamation Division has conducted a technical review of Falkirk Mining Company's application for Revision No. 24 to Surface Coal Mining Permit NAFK-9503 for the Falkirk Mine. The following items must be satisfactorily addressed before the Reclamation Division will recommend Commission action on this application:

Section 1.5 – Identification of Interests and Rights of Entry

1. The hyperlink to surface ownership consent Lease No. 03645 in Tract 51 does not appear to function but the hyperlink for coal ownership consent for the same lease functions properly. Please repair the hyperlink as necessary. (WTG)

Section 2.2 – Ground Water Hydrology

2. Since ground water monitoring wells 319-1 and 319-2 have been destroyed by mining and will not be replaced, please remove those wells from Active Status in the Monitoring Schedule of Section 2.2.6. Since monitoring wells 341-1 and 349-1, 2, 3 will be replaced in the near future, their status can remain as active in the monitoring schedule but should include a note in the comment box regarding future replacement. However, the Monitoring Well Information spreadsheet in Section 2.2.16 and the Completion Details of Monitoring Wells spreadsheet in Section 2.2.20a list the status of all of the above-mentioned wells as destroyed. Please update the permit to provide accurate and consistent well status information in all of the spreadsheets. (BEB)

Section 2.6 – Surface Water Information and Monitoring Plan

3. Watershed modeling narrative in Section 2.6.5, Surface Water Probable Hydrologic Consequences, describes post-mining changes to subwatershed size and topography, and the corresponding changes to modeled peak discharge and runoff volume at control points for subwatersheds as approved in Revision No. 20. Because of proposed changes with Revision No.

24, some of that narrative is now outdated and erroneous. Please update the narrative so that it is current with the information provided on Tables 1 and 2 (4% & 10% events) of Section 2.6.5c, Surface Water PHC Data, and consider adding additional narrative regarding proposed changes to subwatersheds affected with this revision. (BEB/RLK)

4. The legend in the Pre-Mining PHC Map, Section 2.6.5a, provides a label and symbol for a terrain modification boundary (pink line; however, Falkirk does not incorporate this boundary line in its pre-mining PHC maps and reference to a terrain modification boundary can be eliminated from the legend on the map. (BEB)
5. Please update the Postmining Hydrologic Consequences Map, Section 2.6.5b, so that the wetland locations, configurations and contour lines agree with those shown on the Post Mining Topography Map, Section 4.2.6b. (BAJ)

Section 3.1 – Operations Plan - General

6. Please update the Waste Disposal narrative in Section 3.1.1, as well as the Pit Layout and Facilities Map, Section 3.1.5, to describe and depict the waste disposal operation, and location(s) of burial for the concrete waste and trees from the old dragline erection pad, formerly located in Permit NAFK-8705, and reportedly buried in the active pit below ramp R0 in Permit NAFK-9503. (BEB)
7. Please update the Pit Layout and Facilities Map, Section 3.1.5, and the Extended Mining Plan Map, Section 3.1.6, to depict those areas that were “mined out” through 2013. (BEB)
8. A hyperlink in the second full paragraph of page 3 of Section 3.5.1, Transportation Narrative, provides a hyperlink intended for Section 3.5.18, Riverdale Access Road Profile, but actually takes the reader to Section 3.6.18, Design of Sedimentation Pond P-R09-02. Please redirect the hyperlink. (BEB)
9. Falkirk is proposing to construct a large MSHA class pond (P-R06-01) in Section 6 that will destroy significant acreage of woodlands rather than four smaller ponds (P-R33-01, P-R33-02, P-R06-01 and P-R06-02) as previously planned that minimized effects to woodland acreage. Please reconsider constructing this large pond rather than 4 smaller ponds as originally proposed or consider moving the location of the proposed MSHA pond further north to minimize disturbance to woodlands. (NDAC 69-05.2-13-05) (GAW)

Section 3.3.2 – Blasting Plan Map

10. The Blasting Plan Map, Section 3.3.2, does not depict the revised mine plan as proposed with this revision. Please revise as appropriate. (RLK)

Section 3.6 – Operations – Surface Water Management

11. Please add pond P-R25-03 to the Pond and Diversion Construction and Reclamation Schedule, Section 3.6.1d. (BAJ)

12. Please correct the location information for ponds P-R05-01 and P-R05-02 in Section 3.6.27. The location is listed as the SE1/4 of Section 5, T145N, R83W, and should be listed as Section 5, T144N, R83W. (BAJ)
13. Please correct the Township/Range location for pond P-R04-01 in Section 3.6.15. The T/R should be listed as T144N, R83W. (BAJ)
14. Please correct in the Table of Contents in the Water Management Section, Section 3.6.15 - Details of Sedimentation Pond P-R04-01 as Section 3.6.15a is labeled as "Details of Sedimentation Pond P-R01-01" and should be changed to Pond P-R04-01. (BAJ)
15. Please provide preliminary information for ponds P-R05-05 and P-R05-06 located in Section 5, T144N, R83W. Preliminary information must also be provided for the Section 6, T144N, R83W ponds (P-R06-01, P-R06-03, and P-R06-04); the Section 7, T144, R83W ponds (P-R07-01, P-R07-02, and P-R07-03), and the Section 12, T144N, R83W ponds (P-R12-01, P-R12-02 and P-R12-03). (NDAC 69-05.2-09-09.1.b) (BAJ)
16. Please review the Total Water Management Plan Map, Section 3.6.1, and the Worst Cast Bond Plan Map, Section 4.2.4b. Section 3.6.1 shows a large MSHA pond identified as P-R06-01 in Section 6, T144N, R83W. Section 4.2.4b shows two smaller ponds in the same area, identified as P-R06-01 and P-R06-02. Please correct as necessary. (BAJ)

Section 4.1.2 – Post-Mining Land Use Map

17. Please revise the boundary of the strip of hayland located in the NE1/4 of Section 6, T144N, R83W, to show the hayland area through the recreated drainageway area as it previously existed. (GAW)
18. The Post-Mining Land Use Map incorrectly shows that Falkirk is converting cropland located in the SE1/4 of Section 3, T144N, R84W that is not going to be disturbed by mining activities to native grassland but the Pre- and Post-Mining Land Use Acreage tables, Section 4.1.3, are not being updated. Please review and revise as necessary. (GAW)
19. The Pre- and Post-Mining Land Use Acreage tables, Section 4.1.3, indicate that the farmsteads located in the SE1/4 of Section 28 and the SE1/4 of Section 32, T145N, R83W are going to be present post-mining but the Post-Mining Land Use Map, Section 4.1.2, shows that these farmsteads are not going to exist after mining. The Pit Layout and Facilities Map shows a 500 foot setback from the farmsteads and we realize that Falkirk is probably planning to purchase or move these farmsteads; however, the information provided in Section 4.1 should be consistent. Please review and update to provide clarity. (GAW)
20. Wetlands located in the SE1/4 of Section 35, NW1/4 of Section 33, NE1/4 of Section 20, SW1/4 of Section 17, SW1/4 of Section 8, SE1/4 and SW1/4 of Section 9, and NW1/4 and NE1/4 of Section 5, T145N, R83W are depicted and in most instances outlined with a wetland buffer zone as if they are reclaimed seasonal or more permanent wetland,s but they are not labeled as such. Please review and revise as necessary to provide clarity. (GAW)

21. Wetland W-NE25-2 is depicted on the postmine land use map and a design plan for this wetland is included in Section 5.2-2, but this feature does not appear to have been constructed when the haulroad was reclaimed. Please review and revise if necessary. (GAW)
22. Please show replacement woodland acreage for the area affected by proposed MSHA Pond P-R06-01 if this pond will be constructed as proposed. (GAW)

Section 4.2.4 – Reclamation Bond / Cost

23. None of the hyperlinks that are provided in Section 4.2.4 work. Please repair all hyperlinks that connect to Sections 4.2.4a and 4.2.4b. (BEB)
24. Sediment ponds P-R01-01 and P-R01-02 and their related diversions need to be included in the worst case situation under Associated Disturbance that is provided in Section 4.2.4 because they are now planned for construction in 2016. Additionally, pit water pond PW-R07-06 is scheduled for construction in 2017 and since the worst case condition has now been determined to occur in the 4th quarter of 2017, it is reasonable to assume the pond will have been constructed by that time of year and should be considered in the worst case liability. Please review and revise this section as necessary as well as making concurrent changes to associated disturbance areas on the Worst Case Bond Map. (BEB)
25. Related to changes made regarding the above-listed deficiency, which is likely to include the planned adjacent SPGM storage area in the NE1/4 of Section 2, T145N, R84W, in Permit NAFK-9503, we ask that you expand the Worst Case Bond Map further to the west so the entire NAFK-9503 permit boundary is visible on the map. Also, extending the map an additional half-mile or so to the south will allow enough room on the map to show the entire southern boundary of Permit NAFK-9503. (BEB)
26. Please update the length of primary haulroads to be reclaimed to 171,700 ft. The length was calculated from the primary roads shown on Plate 4.2.4b - Worst Case Bonding Plan Map. The costs for haulroad gravel and haulroad grading will need to be updated as well. (BAJ)
27. Please add ponds P-W28-01, P-W29-04, and P-W30-03 to the Worst Case Bond Plan Map, Section 4.2.4b. Please note that reclamation costs are included for the ponds, but the date of reclamation is not clear in the water management section of Permit NAFK-8705. (BAJ)
28. Please add pond P-E14-01R to the worst case reclamation costs. It appears that portions of the pond will be reclaimed as mining disturbance and part as associated disturbance. However, a portion of the pool area (approximately 13 acres) will likely need grading and SPGM respread. This should also be shown on the Worst Case Bonding Map, Section 4.2.4b. (BAJ)
29. Please update the SPGM respread haul distance information for the following areas of Mining Disturbance in Permit NAFK-9503: (BAJ)
 - a) Section 1, T144, R84W: Stockpile locations for respreading this tract are given as Sections 4/36. However, the haul distance is given as 3,000 ft. This should be approximately 15,000 ft. depending on what pile is used. Please review and update as necessary.

- b) Section 9, T144N, R83W: Please increase the haul distance for TS-541 and SS 262 from 1,600 to 1,800 feet.
 - c) Section 26, T145N, R83W: Please increase the haul distance for TS-455 from 1,500 to 2,100 ft, and increase the haul distance from SS-210 (both piles) to 1,500 ft.
 - d) Section 28, T145N, R83W: Stockpiles SS-156/160/178/182/186/268. Most of the subsoil that is designated for Section 28 is stored in Section 24, T145N, R83W, Section 19, T145N, R82W, and Section 30, T145N, R82W. The Reclamation Division has determined the haul distance should be increased from 17,500 ft to 22,000 ft.
 - e) Section 29, T145N, R83W: Please increase the haul distance from 1,500 ft. to 14,600 ft. for Stockpile 455, and increase the haul distance from 1,500 ft. to 14,000 ft. for Stockpile 210.
 - f) Section 35, T145N, R83W: Please increase the haul distance from stockpiles SS-210/244/258 from 2,200 ft. to 4,400 ft.
 - g) Section 36, T145N, R83W: Please increase the haul distance from stockpile SS-244 from 1,100 ft. to 1,400 ft.
30. Please update the SPGM respread summary, haul distance and other information for the following areas of Mining Disturbance in Permit NAFK-8405: (BAJ)
- a) Section 11: Please increase the haul distance for Stockpile 223 from 9,000 ft. to 11,600 ft.
 - b) Section 12: Please calculate 417,199 cubic yards with a 16,900 ft. haul for Stockpile 497 and 1,334,000 cubic yards with a 7,200 ft. haul from the Section 18 stockpiles. Please note that Stockpile 497 (TS) is used to respread Sections 12, 13, 15, and 16. Using Stockpile 497 to respread Section 15 only would deplete this pile (our records show that this pile has slightly more than 417,200 cubic yards.). Also, Stockpile 224 is used for respread in Sections 11, 13, 15, and 16 and there is not enough subsoil in the pile to respread these areas. It also seems unlikely that Falkirk would add to Stockpiles 224 and 497 because of their location. If this is the case, then please include other sources of SPGM for respreading these areas.
 - c) Section 16: *The SPGM Respread Hours Summary – Mining Disturbance Acres* shows 1.6 acres of mining disturbance that will require topsoil and subsoil respread. The Worst Case Bond Plan Map, Section 4.2.4b shows this area to be approximately 11 acres. Please correct as necessary.
 - d) Section 15: *SPGM Respread Hours Summary – Mining Disturbance Acres* states there are 318 acres of mining disturbance. The Reclamation Division calculates that the mining disturbance acres should be 331 acres. Please correct.
31. Please update the SPGM respread hours summary, haul distance and other information for the following areas of Associated Disturbance in Permit NAFK-9503: (BAJ)

- a) Section 1, T144N, R83W: Please include SPGM respread hours and stockpile source for the 10.3-acre Section 1 SPGM storage area that is shown on the Worst Case Bond Plan Map.
- b) Section 5, T144N, R83W: Please include SPGM respread hours and stockpile source for the 33.9 acres of SPGM storage area that is shown on the Worst Case Bond Plan Map.
- c) Section 6, T144N, R83W: Please include SPGM respread hours and stockpile source for the 2.45 acres of SPGM storage area that is shown on the Worst Case Bond Plan Map.
- d) Section 9, T144N, R83W: Please include SPGM respread hours and stockpile source for the 59 acres of SPGM storage area that is shown on the Worst Case Bond Plan Map.
- e) Section 15, T145N, R83W: From the Worst Case Bond Plan Map, Section 4.2.4b, the Reclamation Division calculates 35.25 acres of roads instead of the 27.9 acres as listed in the SPGM respread hours summary. Please correct.
- f) Section 20, T145N, R83W: Please include SPGM respread hours and stockpile source for the 12.88 acres of SPGM storage area that is shown on the Worst Case Bond Plan Map, Section 4.2.4b.
- g) Section 21, T145N, R83W: Please include SPGM respread hours and stockpile source for the 35.47 acres of SPGM storage area that is shown on the Worst Case Bond Plan Map, Section 4.2.4b.
- h) Section 22, T145N, R83W: Please increase the acres for subsoil stockpiles from 5.8 acres to 9.8 acres (Stockpile 276 is 9.8 acres).
- i) Section 23, T145N, R83W: Please review the haul distance for haulroad reclamation in Section 23. Stockpiles 295 and 449 are used for topsoil respread and a 6,500 foot haul distance is used. The Reclamation Division suggests that haul distances be provided for each pile rather than grouping the two piles together, since each pile has vastly different haul distances (approximately 1000 ft. for Stockpile 449, and approximately 10,500 ft. for Stockpile 295) using existing trails and haulroads.
- j) Section 25, T145N, R83W: For the reclamation of the ponds and heat enclosure pad, Stockpile 377 is referenced as a source. However, our records and the Worst Case Bond Plan Map, Section 4.2.4b, do not show a Stockpile 377. Also, we believe the haul distance from Stockpile 375, listed as 2,100 ft. should actually be 2,700 ft. (pile centroid to pond centroid). The haul distance from Stockpile 375 to the heat enclosure pad is listed as 2,100 ft., whereas the Reclamation Division measures the haul distance to be approximately 5,600 ft. For respreading subsoil stockpiles in Section 25, Stockpile 303 is used with a haul distance of 2,700 ft. The Reclamation Division measures the haul distance at 4,400 ft. However, our records indicate that Stockpile 303 only has 5,784 cubic yards of material, far short of the 32,751 cubic

yards required for respread. Another pile will need to be designated to respread the subsoil pile locations. For the haulroad topsoil respread, the distance is listed as 2,500 ft. The Reclamation Division calculates the distance to be approximately 3,500 ft. (centroid of Stockpile 375 to the centroid of Section 25 haulroad). Please correct as necessary.

- k) Section 26, T145N, R83W: From the Worst Case Bond Plan Map, Section 4.2.4b, the Reclamation Division calculates 30.42 acres of roads instead of the 8.0 acres as listed in the SPGM respread hours summary. The haul distance from Stockpile 509 to respread Section 26 haulroads is listed as 2,700 ft. The Reclamation Division calculates the haul distance to be approximately 3,800 ft. Please correct.
- l) Section 27, T145N, R83W: The haul distance to respread haulroads in Section 27 from Stockpile 525 is listed as 10,500 ft. The Reclamation Division calculates the haul distance to be approximately 12,500 ft. using existing haulroads and across the mining disturbance area. The haul distance for pond reclamation in Section 28 is listed as 5,400 ft., but the Reclamation Division calculates the haul distance to be approximately 6,200 ft. using existing haulroads and across the mining disturbance area. Please correct.
- m) Section 28, T145N, R83W: The haul distance to respread haulroads in Section 27 from Stockpiles 583/585 is listed as 5,400 ft. The Reclamation Division calculates the haul distance to be approximately 6,300 ft. using existing haulroads and across the mining disturbance area. Please correct.
- n) Section 32, T145N, R83W: Please include SPGM respread hours for the 4.6 acres of SPGM storage area that is shown on the Worst Case Bond Plan Map, Section 4.2.4b.
- o) Section 33, T145N, R83W: Please include SPGM respread hours for the 2.45 acres of SPGM storage area that is shown on the Worst Case Bond Plan Map, Section 4.2.4b.
- p) Section 4, T144N, R83W: Please review the stockpiles listed for pond reclamation in Section 4 (Stockpiles 391, 377, 375). The haul distance over existing roads/trails is over 11,000 feet from Stockpile 391 to pond P-R04-02, and the haul distance from Stockpile 375 to ponds P-R04-03 and P-R04-04 is approximately 13,000 ft. There is no Stockpile 377. The haul distance for SPGM respread of the pond overburden areas in Section 4 is listed as 500 ft. This is satisfactory for the pond overburden area in the NE1/4 of Section 4 (Stockpiles 535 and 260) but the haul distance for reclamation of the pond overburden area in the SW1/4 of Section 4 is approximately 1200 ft. for Stockpiles 262 and 541. A 500 ft. haul distance is currently listed. Please correct.
- q) Section 29, T145N, R83W: From the Worst Case Bond Plan Map, Section 4.2.4b, the Reclamation Division calculates 15.6 acres of respread for Pond R29-01. The SPGM respread hours summary shows 5.6 acres. Also, two SPGM storage areas are also shown on the Worst Case Bond Plan Map, Section 4.2.4b, that total 9.64 acres but are not included in SPGM Respread Hours Summary. An overburden pile of 5.9

acres is listed in the SPGM Respread Hours Summary, but is not shown on the Worst Case Bond Plan Map. Please correct.

32. Please update the SPGM respread summary and haul distance information for the following areas of Associated Disturbance in Permit NAFK-8405: (BAJ)
- a) Section 7, T146N, R82W: The stockpile listed for reclamation of the portions of ponds in Section 7 is listed to be in Section 12. However, nearly all of Section 12 is mining disturbance and no stockpiles are shown on the Worst Case Bond Plan Map, Section 4.2.4b. Please show the source of SPGM for Section 7 pond reclamation on the Worst Case Bond Plan Map.
 - b) Section 10, T146N, R82W: Please add SPGM respread hours for the 4.1 acre SPGM storage area shown on the Worst Case Bond Plan Map, Section 4.2.4b.
 - c) Section 11, T146N, R82W: Please add SPGM respread hours for the 2.8 acre SPGM storage area shown on the Worst Case Bond Plan Map, Section 4.2.4b.
 - d) Section 13, T146N, R82W: A 3,500 ft. haul distance is shown for reclamation of the Section 13 diversions. The Reclamation Division calculates that this distance is approximately 5,000 ft. using a route through mining disturbance. The haul distance for topsoil respread on the Section 13 overburden pile is listed as 11,500 ft. The Reclamation Division calculates this distance at approximately 12,600 ft. Please correct as necessary.
 - e) Section 15, T146N, R82W: Please add 1.7 acres of topsoil respread for subsoil Stockpile 230 and also add SPGM respread hours for the 2.8 acre SPGM storage area shown on the Worst Case Bond Plan Map, Section 4.2.4b. The haul distance for reclamation of the Section 15 ponds should be approximately 750 ft. instead of the 500 ft. that is listed. The haul distance to reclaim the portion of haulroad in Section 15 appears to be 1,100 ft., not 500 ft. as listed (distance from Stockpile 230). Please correct.
 - f) Section 23, T146N, R82W: For pond reclamation in Section 23, subsoil Stockpile 240 is listed as the source. However, Stockpile 240 is not shown on the Worst Case Bond Plan Map, Section 4.2.4b, and stockpile list from the 2012 Annual Map also do not show a Stockpile 240. For respread of subsoil stockpiles and overburden piles in Section 23, Stockpile 277 is listed as the source, but there is no Stockpile 277 shown on the Worst Case Bond Plan Map, Section 4.2.4b, and it is not listed on the 2012 Annual Map. Please correct as necessary.

Section 4.2.6b – Post-Mining Contour Map

33. Please revise the Post-Mining Contour Map, Section 4.2.6b, to show the permit boundary more prominently. In many instances the permit boundary cannot be seen on this map. (GAW)
34. Falkirk is proposing much steeper slopes around a hill located on cropland in the northwest corner of Section 6, T144N, R83W and the northeast corner of Section 1, T144N, R84W, than

what was previously approved or existed prior to mining. Please revise so slopes are no steeper than that which was previously approved in this area. (NDCC 38-14.1-24(3)) (GAW)

35. Falkirk is proposing greater acreage of steeper slopes in the NW1/4 of Section 12 than existed prior to mining, but appear to be less steep than what was previously approved. Please consider reducing the slope steepness further in this area as required by NDCC 38-14.1-24(3). (GAW)
36. Falkirk is proposing steeper slopes on cropland areas located in the N1/2 of the NE1/4 and the E1/2 of the NW1/4 of Section 33 than what was previously approved, and they are also steeper than that which existed prior to mining. Please reduce the slope steepness in these areas as required by NDCC 38-14.1-24(3). (GAW)
37. Although the surface owner has requested that the pre-mine cropland in the SW1/4 of Section 32, T144N, R83W be seeded to native grassland, please revise the postmine topography to show that the pre-mine capabilities of the cropland in this tract is being restored as required by NDCC 38-14.1-24(2). In other words, please revise the topography so that 24 acres of cropland could be restored on this tract as existed prior to mining. (GAW)

Section 5.2 – Post-Mining Wetlands

38. Permit narrative in Section 5.2.1, Post-Mining Wetland Design Narrative, describes that because evaporation greatly exceeds precipitation at Falkirk, seasonal and semi-permanent wetlands with small watershed areas are designed with a minimum depth of three feet to maintain water during periodic dry years, which is a reasonable design criterion. However, details for 13 of the 19 wetlands proposed with this revision have design depths of 2 feet in the wetland basin and almost half of those are designed to be only 1 foot deep. We realize that most of the proposed reconstructed wetlands with this revision are replacing temporary wetlands, but several of them such as SW27-01 and NW28-01 appear to be replacements for larger, premine seasonal wetlands. The watershed areas for most of the designed wetlands are relatively small, averaging about 115 acres and several of them are as small as 15-30 acres. Please review your proposed wetland designs compared with watershed size and your permit narrative and consider updating the design details for some of those wetlands (both temporary and seasonal) if deemed appropriate so that wetland reconstruction efforts at Falkirk is a successful endeavor. (BEB)
39. The western portion of reclaimed wetland W-NW27-01 is not shown on the wetland design details, page 24 of 70 of Section 5.2-2. Please revise to show the entire basin area of the wetland. (GAW)
40. Created wetland W-NE23-2 is depicted differently in the wetland design details of Section 5.2-2 compared to how it is shown on the Post-Mining Land Use Map, Section 4.1.2. The shape of the wetland basin appears to be a mirrored image of the drawing. Please review and correct as necessary. (GAW)

In the future, whenever changes to post-mining topography are proposed it would be appreciated if the specific areas being updated are identified in the permit, either in the Revision List of Changes of Section 1.1.3 (by providing T/R, Section and, if necessary, 1/4 Section locations) and/or by providing temporary shading or hatching of the affected, updated areas on applicable maps. Reclamation Division staff have spent many hours attempting to determine the topographic changes proposed by this revision within this 17,000-acre permit area. Please commit to providing future topographic changes to the permit

Mr. D. Randall Crooke

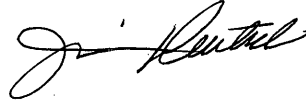
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in a manner that will narrow down our review area, and more clearly identify the affected/updated areas.
(BEB/GAW/WTG)

If you have any questions, please contact this office.

Sincerely,

A handwritten signature in black ink, appearing to read "James R. Deutsch". The signature is fluid and cursive, with a large initial "J" and "D".

James R. Deutsch
Director
Reclamation Division

cc: Mclean County Auditor

Minedata/Falkirk/Permits/NAFK-9503/Revisions/No.24/Rev24_tech_rvw_ltr_3-13-14