

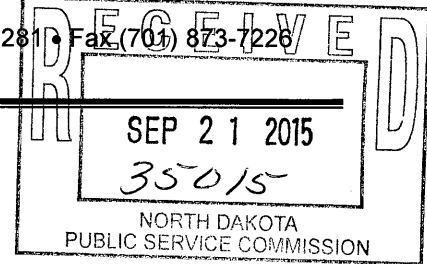
# THE COTEAU PROPERTIES COMPANY

A SUBSIDIARY OF THE NORTH AMERICAN COAL CORPORATION

FREEDOM MINE

204 County Road 15  
Beulah, North Dakota 58523-9475

(701) 873-2281 • Fax (701) 873-7226



September 18, 2015

Mr. James R. Deutsch  
Director Reclamation Division  
Public Service Commission  
600 East Boulevard Avenue  
Department 408  
Bismarck, ND 58505-0480

Dear Mr. Deutsch:

Enclosed are three DVD's containing the revised Consolidated Bonding Plan, which is attached to Revision 27 to Permit NACT-0401. Responses below refer to deficiencies in your June 25, 2015 letter:

1. See revised pages 2 and 4-6 of Section A-2. As discussed in the July 17, 2015 meeting between your staff and Mike Berg, no salvage values were actually used in computing the removal cost. Therefore, the Antelope Creek crossing remained unchanged. However, actual costs from the removal of the Highway 1806 overpass were used to calculate costs for removing the MOAB Bridge, as well as the County Road 21 overpass.
2. See the revised Mine Facilities Map of Section C-2.
3. See revised page 1 of Section B-5. Acres that will be disturbed were calculated at the denser seeding rate, as stated in the permit. It should be noted that the permit also states, "This replacement planting style is approximately half the size of the pre-mining planting, but contains approximately the same number of trees and lineal feet of shelterbelt." Therefore, no additional acres were added for areas such as Section 36, since the lineal feet of planting is already double what was disturbed.
4. See revised page 1 of Section C-1.
5. Both permits NACT-9101 and NACT-0201 are undergoing revisions concurrent with the revision of the worst case bond calculation. These calculations were updated to reflect the changes in mining plans in both revisions. Furthermore, neither of these pits will be mined prior to 2022, therefore excluding them from the calculations.
6. See the revised Mine Facilities Map of Section C-2. Pond P-W31-01 was added to the calculations, along with a portion of subsoil pile SS-318. However, since sump S-W31-01 was used to control runoff from the subsoil pile and the majority of that pile is planned to be removed, sump S-W31-01 is also assumed to be removed. A small amount of material will remain on the pile to reclaim the pond and the diversion leading to the pond.

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7. See the revised Mine Facilities Map of Section C-2, the revised Topsoil Respread Map of Section C-3, and the revised Subsoil Respread Map of Section C-4.
8. See revised page 1 of Section B-1, revised pages 1-11 of Section B-2, revised pages 1-2 and 5 of Section B-3, revised page 1 of Section B-4, revised page 1 of Section B-5, the revised Mine Facilities Map of Section C-2, the revised Topsoil Respread Map of Section C-3, and the revised Subsoil Respread Map of Section C-4.

In addition, during the July 17, 2015 meeting, it was noted that topsoil and subsoil volumes appeared to be underestimated compared to what material was currently inventoried. Upon further investigation, stripping limits and several ramp widths were adjusted. Stripping is now shown two years ahead of mining in Mine Area 1 and the East Mine Area to more accurately depict conditions that are occurring in the field. Impacts of these changes can be seen throughout the calculations.

If you have any questions, please contact me.

Sincerely,

THE COTEAU PROPERTIES COMPANY

*William R. Kile*

for

Troy J. Leingang  
Environmental Manager

AJH  
Enc.

cc: Shana Brost, Mercer County Auditor (w/enc.)