

# 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

January 23, 2019

Mr. Dean K. Moos  
Director Reclamation Division  
Public Service Commission  
600 East Boulevard Avenue  
Department 408  
Bismarck, ND 58505-0480

Dear Mr. Moos:

Final Bond Release #7 to Permit NACT-9101 has been uploaded to the Permit Services site. Changes to text have been highlighted in orange. Responses below refer to technical deficiencies in your January 8, 2019, letter:

**Attachment VIIIc – Yield Calculations and Test Weight Comparison**

1. *Follow-up to Item 1d of our September 25 review: Coteau's response to this item indicates that the 2018 control area harvested acreage is based on a GPS readout of the producer's combine. Please provide the yield map and GPS information for the harvested control area to document that the control area is actually larger than determined for Coteau's Consolidated Vegetation Success Standards (CVSS) document. (RLK)*

After discussions with Randy Kowalski, the cropped acres for the 2018 control area have been adjusted to meet the acres mapped in the CVSS, 34.6 acres. This change has been applied to Attachments VIIIb and VIIIc.

**Attachment VIIIb – Vegetative Productivity Standards for Cropland**

2. *Follow-up to Item No. 2 of our September 25 review: The revised test weight and dockage sample information for 2018 provided on pages 2 and 4 of Attachment VIII d indicates that the samples were tested approximately one month after they were collected by the producer. Please revise to clarify the procedures and protocols used to ensure the samples represent individual reclaimed fields. It appears samples were taken from the combine or trucks, stored and then delivered by either the producer or Coteau employee for testing on the date indicated. (RLK)*

A standard operating procedure document outlining testing protocols has been included in Attachment VIII d. This document has also been referenced in the text in Attachment VIII a.

If you have any questions, please contact me.

Sincerely,

THE COTEAU PROPERTIES COMPANY

/s/

Kayla Torgerson  
Environmental Specialist

Uploaded via Permit Services

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Coteau response to sixth technical review letter  
Coteau Properties Company  
Kayla Torgerson

