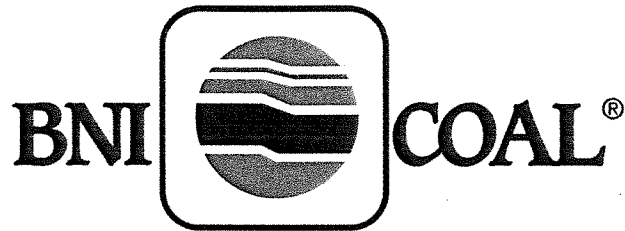


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AN ALLETE COMPANY

2360 35TH AVENUE SW CENTER, ND 58530-9499
MINING LIGNITE AT THE CENTER MINE SINCE 1970

March 12, 2018

Mr. Dean Moos, Director
Reclamation Division, NDPSC
Department 408
600 East Boulevard Avenue
Bismarck, ND 58505-0480

RE: Renewal 7/Revision 57 to Permit BNCR-8106

Dear Mr. Moos,

This submittal contains a response to your pre-renewal review letter to us dated January 08, 2018. In this letter you listed deficiencies that must be addressed before the Renewal 7/Revision 57 application to BNCR-8106 can be deemed complete. Below is a listing of the deficiencies followed by our response:

Section 1.7 – Business Entity Information

1. Please revise Section 1.7 to reflect any changes to the corporate officers and board members for BNI Coal, Ltd., BNI Energy, Inc. and Allete, and any other changes to the corporate organization, since the most recent updates with Revision No. 56. (WTG/RLK)

Section 1.7 Business Entity Information has been updated as requested.

Section 1.9 – Surface and Coal Ownership

2. Please update the permit area and contiguous (extending one-quarter mile from the permit boundary) surface ownership in Section 1.9 as required by NDCC 38-14.1-14(1)(c)(2) and NDAC 69-05.2-06-01(1)(a), and make the corresponding updates to Plate 9A (Ownership Map) if any changes to surface ownership have occurred since the most recent updates with Revision No. 56. (WTG/RLK)

Section 1.9 and Plate 9A have been updated as requested.

Section 1.12 – Other Licenses and Permits

3. Please review and update Section 1.12 to reflect any changes that may have occurred since Revision No. 56. (WTG/RLK)

Section 1.12 has been updated as requested.

Section 1.13 – Past Violations

4. Please review and update Section 1.13 to reflect any changes that may have occurred since Revision No. 56. Also, consider removing narrative in this section pertaining to violations that were issued and resolved more than three years ago. (WTG/RLK)

Section 1.13 has been updated to remove past violations outside of 3 years.

Section 2.1 – Extended Mine Plan

5. Please replace Plate 6 with the Center Mine Extended Mine Plan map that will be submitted in January 2018 as required by NDAC 69-05.2-07-02. (WTG)

The most recent Extended Mine Plan Map is included with this submittal.

Section IV – Operation Plan

6. Please update the Pit Layout Facilities Map, Plate 12 to reflect any changes with the status or presence of SPGM stockpiles; overburden stockpiles; water management structures; haul roads, access roads, and walkways; and buildings, facilities, utilities, and structures that have occurred since the map was last updated with Revision 56. (WTG/JSP)

The Pit Layout and Facilities Map has been updated as requested.

Section 4.12.1 – Post Mine Land Use

7. Please review the native grassland narratives and tables in Section 4.12.4, Determining Reclamation Success, to ensure the information provided is current and continues to characterize the sites. The information in the tables on pages 4.12.4-2 and 4.12.4-4 should be updated with data from recent years. [NDAC 69-05.2-11-01(2)]. (GAW)

The information in the tables on pages 4.12.4-2 (South Reference Area) and 4.12.4-4 (North Reference Area) was updated as requested. Likewise, the associated text was revised as well.

Section 4.13 – Fish and Wildlife Resource... Plan

8. Please update the third paragraph on page 4.13-1 to clarify that there are now twelve rather than eleven listed species in North Dakota and that habitat does not exist for eight rather than seven of these species. The Rusty Patched Bumble Bee was listed Endangered January 11, 2017 and its range includes the southeastern corner of North

Dakota. Please also update the table on page 4.13-6 that identifies the threatened, endangered and candidate species found in North Dakota. (GAW)

The third paragraph on page 4.13-1 was updated to reflect the addition of the Rusty Patched Bumble Bee as requested. Likewise, the table on page 4.13-6 was also updated by adding the Rusty Patched Bumble Bee to the endangered status.

9. Please update Plate 39, Wildlife Monitoring Map – Mine-wide, to show the current permit boundary of Permit BNCR-9401. Revision 14 to BNCR-9401 deleted 15.24 acres from the permit. (GAW)

The permit boundary for BNCR-9401 and Revision 57 addition have been updated.

Appendix 4.14 Worst Case Bond Calculations

10. Please update the Section 3 Ash Cell reclamation narrative in Section 4.14; Appendix Worst Case Bond Calculations; Plate 4.14-1, Worst Case Bond Calculation Map; and Plate 14.14-2, Worst Case Bond Pit Cross Sections as appropriate to be consistent with the information submitted for Revision No. 40 to Permit BNCR-9702. [NDAC 69-05.2-11-03(5)(e)] (JSP/RLK)

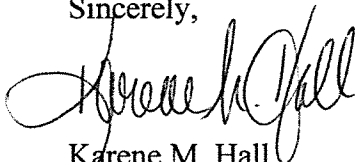
Section 3 Ash Cell reclamation narrative has been updated to say that is was reclaimed in 2016 and 2017, while seeding will be completed in 2018. Plate 4.14-1, Plate 4.14-2, and the most recent version of the worst case bond calculation has been included.

Please note that Revision 57 contains information to re-permit a 2.1 acre tract along the east side of the West Bridge overpass. Plates that have been updated and included with the addition boundary change are:

Plate 1 of 1 Legal Description Revision 57, Plate 13 Surface Water Control Map, Plate 15 Post Mining Topographic Contours Map, Plate 15C Post Mining Land Use Map. The plates listed above in the deficiencies have also been updated with the additional acreage boundary.

Thank you for your consideration of this matter. If you have any questions regarding this submittal, please contact me at the Center office.

Sincerely,



Karene M. Hall
Permit Coordinator