



United States Department of Agriculture

June 7, 2021

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JUN 10 2021

Natural Resources
Conservation Service

Dean K. Moos, Director, Reclamation Division
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Bismarck, ND 58505-0480

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Bismarck, ND
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Dear Mr. Moos:

NORTH DAKOTA
PUBLIC SERVICE COMMISSION

This letter is in reference to the application for Revision No. 8 to Permit BNCR-1101 at the Center Mine in Oliver County, North Dakota. We have reviewed the prime farmland section 3.7 and submit the following comments.

The revision states that prime and nonprime subsoils will be mixed. In the past, subsoil mixing has been an acceptable practice and has proved adequate for reclamation success. The concern we have is on-site samples are not used to determine similarities between prime and nonprime subsoil. The USDA-Natural Resources Conservation Service (NRCS) would prefer onsite sampling from the specific area of non-prime subsoils to be mixed with prime farmland subsoils for these comparisons. This method provides more accuracy and reliable results than comparisons with subsoils from adjacent permit areas.

Additionally, the revision states that nonprime topsoil may be supplemented or substituted if prime farmland topsoil material is of lesser quality. NRCS would prefer onsite sampling of nonprime topsoil used in supplementing or substituting. Currently, we have not found guidance in the revision on this issue. Although, it is noted in the revision that this activity may be considered by the PSC.

To manage consistency with units of measurements, electrical conductivity is now expressed as dS/m. mmhos/cm is no longer used.

Throughout the Prime Farmland section, inches have been used as a unit of measurement except on page 6 where a reference to centimeters is used. Either inches or centimeters is acceptable but should be consistent throughout to avoid confusion.

Thank you for the opportunity to review this permit and we look forward to working with you in the future.

Sincerely,

MARY
PODOLL
MARY E. PODOLL
State Conservationist

Digitally signed by
MARY PODOLL
Date: 2021.06.07
15:05:11 -05'00'

cc: Wade Bott, State Soil Scientist, NRCS, Bismarck ND

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Comments from NRCS regarding prime farmland
United States Department of Agriculture Bismarck State Office
Mary Podoll