



Westmoreland Beulah Mining - *Beulah Mine*
A Subsidiary of Westmoreland Mining LLC

June 3, 2022

Zanna Brinkman
Director Reclamation Division
North Dakota Public Service Commission
600 E Boulevard Ave, Dept. 408
Bismarck, ND 58505-0480

Permit ID: KRSB-8603
Subject: NOV 2201-Investigation of Embankment Failures

Dear Ms. Brinkman:

The following is in response to Notice of Violation #2201, dated May 25, 2022, regarding completion of the *Investigation of the Embankment Failures* within 20 days of the receipt of the NOV.

Pond 081

Erosion around the 36-inch vertical standpipe was caused by rusting that occurred at the connection of the standpipe to the bottom faceplate. The rusting allowed water to erode around the base of the vertical standpipe, prior to the water entering the downslope culvert. Westmoreland Beulah Mining (WBM) had a culvert contractor evaluate the rusting to determine the best corrective action to fix the issue. One alternative was to sleeve the entire pipe and grout between the sleeve and the original pipe. Because of the near 90-degree turn in the pipe, sleeving could not be done. The next alternative was to cement, in-place, the base of the standpipe to fully seal the rusted area. The rusted area extends approximately 6 to 8 inches above the base plate about a foot in circumference in the standpipe. The concrete in-place alternative appears to be the best solution to the piping. Once concreted, the piping area around the standpipe will be packed in place with suitable, dry material. Either after or prior to construction, the downslope culvert will be cleaned of any extraneous sediment.

Pond 082

As with Pond 081, erosion around the standpipe was caused by rusting that occurred at the connection of the vertical standpipe to a 90-degree elbow. The rusting cannot be concreted in place because of the size of the standpipe and elbow. A new High-Density Polyethylene (Poly) elbow and standpipe will be connected to the existing downslope culvert. The new poly structure will be 10-inch in circumference, and will slip inside the existing 12-inch downstream culvert. A foam grout will be used to seal the Poly elbow to the downstream culvert, and the new Poly elbow will be concreted to the faceplate to hold it in place. Once completed, the piping area around the standpipe will be packed in place with suitable, dry material. Either after or prior to construction, the downslope culvert will be cleaned of any extraneous sediment.





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Photos taken on June 1, 2022, have been attached to this letter. Please let me know if you have any questions regarding the investigation or the recommended repairs to the Pond 81 and Pond 82 overflow structures.

Sincerely,

Jesse Noel, P.E.
Director, Environmental & Regulatory Affairs
Westmoreland Mining LLC

Cc: Jerry Gillespie



Pond 081 Vertical Standpipe Base, June 1, 2022



Pond 082 Vertical Standpipe Base, June 1, 2022

