

FREEDOM MINE
THE COTEAU PROPERTIES COMPANY

April 10, 2025

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

Dear Mr. Emmer:

Final Bond Release #2 to Permit NACT-1801 has been uploaded to Permit Services. Changes have been tracked using track changes and highlighted in cyan. Responses below refer to technical review deficiencies in your January 29, 2025 letter.

Attachment VIa – Tract 1 General Information

1. *Please consider including the 2024 yearly management description for Tract 1 on page 4 of Attachment VIa (Tract 1 General Information). (WWS)*

The 2024 yearly management description for Tract 1 on page 4 of Attachment VIa (Tract 1 General Information) has been included as requested.

2. *Please include a narrative in Attachment VIa (Tract 1 General Information) that describes the general flow of surface water within the bond release tract and how the land will not contribute suspended solids to streamflow outside the permit area as required in NDAC 69-05.2-12-12(7)(b). (JAR/GAW)*

Attachment VIa (Tract 1 General Information) has been updated with language regarding surface water within Tract 1.

Attachment VIb – Tract 2 General Information

3. *Please consider including the 2024 yearly management description for Tract 2 on page 3 of Attachment VIb (Tract 2 General Information). (WWS)*

Freedom Mine – Coteau Properties Company

204 County Road 15
Beulah, ND 58523
P: 701.873.2281

NACoal.com

Coteau Properties Company, a subsidiary company of The North American Coal Corporation

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Coteau Properties Company
Mark A Wallen

The 2024 yearly management description for Tract 2 on page 3 of Attachment VIb (Tract 2 General Information) has been included as requested.

4. *Please include a narrative in Attachment VIb (Tract 2 General Information) that describes the general flow of surface water within the bond release tract and how the land will not contribute suspended solids to streamflow outside the permit area as required in NDAC 69-05.2-12-12(7)(b). (JAR/GAW)*

Attachment VIb (Tract 2 General Information) has been updated with language regarding surface water within Tract 2.

Attachment VIII – Wildlife Assessment

5. *Attachment VIII (Wildlife Assessment) references the 2022-2023 Wildlife Monitoring Report. The 2022-2023 Wildlife Monitoring Report has information on post-mining habitats and wildlife monitoring data for the South and Island (EMA) Study Areas in the Long-Term Specific Analysis subsection. Please update Attachment VIII to provide an analysis of the post-mining habitats and wildlife monitoring data. (AAC)*

Language has been added to further reference the CWHMP where a complete analysis of collected data can be found.

Attachment IXa1 – Production Standard Calculations

6. *Please revise the t-distribution (t) value from 1.315 to 1.316 on page 2 of Attachment IXa1 (Production Standard Calculations) to reflect page III-E-6 of the Revegetation Success Standards document. Degrees of freedom are calculated as $n - 1$. Since 26 samples were taken, the 90% level would be 1.316. Please update all applicable calculations after this correction has been made. (GAW)*

The t-distribution (t) value has been updated as requested.

Attachment IXb1 – Production Standard Calculations

7. *Please revise the t-distribution (t) value from 1.345 to 1.35 on page 2 of Attachment IXb1 (Production Standard Calculations) to reflect page III-E-6 of the Revegetation Success Standards document. Degrees of freedom are calculated as $n - 1$. Since 14 samples were taken, the 90% level would be 1.35. Please update all applicable calculations after this correction has been made. (GAW)*

The t-distribution (t) value has been updated as requested.

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8. *Please revise the t-distribution (t) value from 1.323 to 1.325 on page 6 of Attachment IXb1 (Production Standard Calculations) to reflect page III-E-6 of the Revegetation Success Standards document. Degrees of freedom are calculated as $n - 1$. Since 21 samples were taken, the 90% level would be 1.325. Please update all applicable calculations after this correction has been made. (GAW)*

The t-distribution (t) value has been updated as requested.

If you have any questions, please contact me.

Sincerely,

THE COTEAU PROPERTIES COMPANY

Mark A. Wallen
Environmental Specialist

Uploaded via Permit Services