



Public Service Commission

Sheri Haugen-Hoffart

Randy Christmann

Jill Kringstad

600 East Boulevard Ave
Dept. 408
Bismarck, ND 58505-0480
701-328-2400
ndpsc@nd.gov

sent via email only

September 15, 2025

Mr. Miroslav Zvyagelskiy
Operations Manager
Leonardite Products, LLC
PO Box 548
Williston, ND 58802-0548
miroslav@leonarditeproducts.com

Dear Mr. Zvyagelskiy:

The Reclamation Division has reviewed Leonardite Products, LLC's August 28, 2025 response to our August 8, 2025 technical review of Revision No. 12 to Permit GRGR-0501 at the Stony Creek Mine. The following items must be adequately addressed prior to Commission approval of the revision and the corresponding renewal.

VI - Reclamation Plan

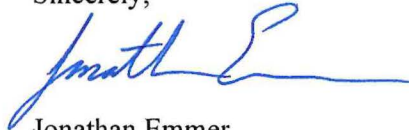
1. It is unclear how far in advance topsoil, subsoil, and overburden are typically removed prior to mining a subarea. Please update the narrative in Section V (Operations Plan) or clarify the assumptions within page R-7 of Section VI (Reclamation Plan) regarding removal timing of topsoil, subsoil, and overburden in relation to Leonardite mining. For example, if mining is planned for the 3rd quarter of 2027, is it common practice for topsoil, subsoil, and the majority of overburden to be removed one quarter earlier. Please review and revise as necessary to provide clarification. (BSM)
2. Based on Item No. 1 above, please review and verify whether pit G-2 within Table O-1 on Page O-2A of Section V (Operations Plan) is excluded from the worst-case bond period calculations regarding topsoil, subsoil, and overburden replacement. If removals for pit G-2 are expected to occur by the 2nd quarter of 2027, please revise the Topsoil and Subsoil Replacement tables and the volume assumptions subsections on page R-7 of Section VI (Reclamation Plans), and corresponding reclamation costs. (BSM)
3. Follow-up to Item No. 2 of the August 8, 2025 technical review letter: based on the revised Table O-1 on Page O-2A of Section V (Operations Plan), the Subsoil Replacement table on page R-7 of Section VI (Reclamation Plan) should not list pit D-3 (3 Acres). Table O-1 indicates that D-3 will conclude "Final Grading and Subsoil Respread" in the 3rd quarter of 2026, which is prior to the worst-case bond period. Please remove pit D-3 (3 Acres) from the Subsoil Replacement table, volume assumption subsection on page R-7 of Section VI, and corresponding reclamation costs. (BSM)

Mr. Zvyagelskiy
September 15, 2025
Page 2 of 2

4. Based on the revised Table O-1 on Page O-2A of Section V (Operations Plan), during the worst-case bond period of the 2nd quarter of 2027, pits D-3, D-2, D-1, G-1, and possibly G-2 will have been disturbed for mining operations. These areas, totaling 15 acres, should be included under Mining Disturbance in the Revegetation Costs subsection on Page R-8 of Section VI (Reclamation Plan). Please review and revise accordingly in the Revegetation Costs subsection on Page R-8. (BSM)

Please contact this office if you have any questions.

Sincerely,



Jonathan Emmer
Director
Reclamation Division

cc via email only: Cherie Harms (cherie@leonarditeproducts.com)