

August 6, 2025

Mr. Jonathan Emmer  
Director, Reclamation Division  
600 E Boulevard Ave, Dept. 408  
Bismarck ND 58505-0480

**RE: Notice of Violation (NOV) 2501 – Remediation Plan – Follow Up Results**

Dear Mr. Emmer:

Westmoreland Beulah Mining LLC (WBM) collected 71 soil samples from the affected area on July 10, 2025, according to your approval letter dated June 20, 2025. Please see Figure 1 for the sample locations.

Attached, please find Table 1 showing the results of the 71 samples collected. All samples collected met the criteria for suitable plant growth material (SPGM) with regard to both Percent *Organic Matter (OM)* and *Electrical Conductivity (EC)*. Only two samples exceeded a *Soil Absorption Ratio* of 10 (*SAR*). These results demonstrate that removal of the contaminated material was successful. Soil depths were within the approved soil respread depths and were observed by PSC inspectors during their site visit.

WBM requests the PSC abate NOV 2501 and allow operations to seed the affected area. WBM will be submitting a grade approval in the adjacent area. Until the NOV is abated, access adjacent to this area will not be operationally available and therefore additional adjacent soil laydown cannot be completed.

Should you have any questions, please feel free to contact me.

Sincerely,

Rylan Sundsbak  
Environmental Supervisor  
Westmoreland Beulah Mining LLC

Cc: Monty Johnson (email moljohnson@nd.gov)  
Juris Ore, (email jore@westmoreland.com)  
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**TABLE 1 - Sample Results**

Sample Description	EC @ 25C mmhos/cm	SAR	OM wt%
1	1.16	1.97	3.2
2	1.29	1.87	2.4
3	2.18	4.02	2.7
4	1.24	2.03	3.0
5	1.20	4.00	2.1
6	2.83	1.12	2.3
7	2.22	1.93	2.6
8	1.84	12.40	2.1
9	1.40	6.17	2.7
10	2.21	2.77	2.3
11	3.38	1.48	2.3
12	0.67	2.90	2.4
13	0.54	1.52	1.8
14	1.97	7.30	3.0
15	1.85	1.06	2.5
16	1.34	4.17	2.4
17	2.92	3.64	2.7
18	1.63	2.35	2.1
19	2.18	0.91	2.6
20	1.16	2.34	2.5
21	0.93	5.45	2.7
22	1.36	4.77	3.2
23	1.88	0.77	2.3
24	1.25	2.85	2.2
25	1.20	3.93	2.8
26	2.38	9.48	2.6
27	1.08	1.56	3.1
28	1.35	3.38	2.6
29	1.27	3.93	3.1
30	1.99	9.87	2.7
31	1.57	1.16	2.5
32	0.65	2.25	2.1
33	1.19	3.30	3.1
34	1.47	2.02	2.2
35	2.52	0.87	2.4

**TABLE 1 - Sample Results**

Sample Description	EC @ 25C mmhos/cm	SAR	OM wt%
36	1.64	2.90	2.4
37	0.64	3.07	2.7
38	2.16	1.94	2.3
39	2.45	0.93	2.3
40	1.28	2.56	3.0
41	1.20	2.02	3.0
42	1.42	2.19	2.0
43	1.25	0.70	2.7
44	2.40	1.94	2.7
45	0.94	2.78	2.4
46	1.86	1.09	2.5
47	0.79	1.11	2.8
48	2.52	8.62	2.5
49	0.97	1.64	3.7
50	1.52	2.84	1.9
51	1.41	0.73	2.3
52	1.16	0.90	2.3
53	0.73	2.05	2.0
54	0.67	1.27	2.0
55	1.79	1.12	3.1
56	1.06	5.24	2.5
57	1.05	1.32	3.3
58	2.53	18.10	1.6
59	1.00	1.30	2.0
60	2.98	1.87	2.3
61	0.81	1.10	2.0
62	1.66	1.28	2.2
63	1.34	1.99	2.2
64	0.94	4.09	2.4
65	1.16	1.46	2.9
66	0.61	1.98	2.2
67	1.16	2.27	2.3
68	1.54	1.50	2.3
69	1.22	0.97	2.3
70	1.27	0.99	2.4
71	1.22	0.90	2.1



Cropland

GOLD PIT  
NOV 25-01



Not to Scale

Figure 1

Native  
Grassland