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January 18, 2013

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Administrator
Land Quality Division
Wyoming Department of Environmental Quality
Third Floor West, Herschler Building
122 West 25th Street
Cheyenne WY 82002

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**Jim Ruby, Executive Secretary
Environmental Quality Council**

Re: Comments on application for amendment to
Arch of Wyoming Saddleback Hills underground
coal-mining Permit 730-T2

Relevant administrator:

SCOPE

I will make specific reference to the following ten complexes of documents through the text of this evaluation; they are listed in sequence of first appearance in this letter, not by dates on the documents:

1. Application from Arch of Wyoming, LLC for an Addendum to DEQ's authorized coal-mining Permit 730-T2 issued to Arch of Wyoming (of November 2010, which became effective in December 2012), requesting addition of sections to be mined (see Public Notice No. 4663 of December 2012 in *Rawlins Daily Times*);
2. BLM's Draft (1998) and Final (1999) Environmental Impact Statement, focused exclusively on coal mining for off-site sale;
3. MBFP's application to ISC (September 2007) to construct a Coal-To-Liquid (CTL) conversion facility, followed by ISC's granting of an Order for approval of that application and construction of project (January 2008);
4. DEQ's authorization of MBFP's application for Permit CT-5873 to construct an underground coal mine and industrial gasification and liquifaction plant (March 2009);
5. 'Final Opinion' from Wyoming State Engineer's Office on water supply/yield for MBFP CTL plant and coal mine (October 2007);
6. My comments of January 9, 2013, addressed to Program Principal of ISC, related to MBFP's November 2012 changes in schedule, scope, and size of its CTL facility and its socioeconomic update;
7. USACE/DEQ's jointly issued Public Notice (May 2012) of Arch of Wyoming's application for a permit focused exclusively on coal mining under Sec. 404 of federal Clean Water Act;
8. My letter of June 25, 2012 in a second response to USACE/DEQ's jointly issued Public Notice;
9. Apparently aborted and certainly publicly unavailable draft EIS from DOE focusing on MBFP's CTL project (2010?); and
10. Notice in Federal Register (November 2009) that a comprehensive, NEPA- and ESA-compliant EIS for MBFP's CTL project is to be composed by the Department of Energy.

All will recognize that this review is not bounded by formalistic limits of the permit amendment as applied for by Arch of Wyoming, LLC from the Land Quality Division of DEQ. With such a complex project, pursuit of relevant issues using strict limitations of that application would be pointless; analytical comprehensiveness is essential. Each document discussed here is functionally related to all the others, and each encompasses unique factual components that are central to gaining valid guidance toward successful project evaluation and management. The requested amendment, in reality, is more than it first appears. It is not simply an alteration to a mine plan. Rather, it is a mining project upon which an intimately related, complex industrial facility is being added. There exist two components to this project, not just mining. In light of

LQD

regulatory responsibilities assigned by Wyoming law to DEQ, the mining and chemical-conversion components of the total project cannot be considered independently.

JAN 22 2013

BACKGROUND OF THE COAL MINE

My statement relates to the 'Public Notice' and seven-volume application (from Arch of Wyoming, LLC of Hanna, WY) for amendment of its coal-mining permit as issued by the Land Quality Division (LQD) of Wyoming's Department of Environmental Quality (DEQ). Although not specified in the Public Notice, the requested 'amendment to its coal mining permit' applies to Permit 730-T2, which was approved by LQD on December 16, 2010 and became effective on December 17, 2012. I personally have studied key parts of the original permit (held on shelving for the LQD in Cheyenne's Herschler Building) since the spring of 2012, and I scanned the entirety of the application for the amendment early in this month.

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Public Notice of the requested amendment first appeared on December 7, 2012 in the *Rawlins Daily Times* as 'No. 4663.' It was incorrectly identified at that time as 'Second publication for the Saddleback Hills underground coal mine permit amendment.' Confusion related to the application, however, extends well beyond that clerical error.

As background, 'Arch of Wyoming, LLC' (a subsidiary of Arch Coal, Inc. of St. Louis) was specifically identified in the Draft (July 1998, DES-98-32) and 'Final Carbon Basin Coal Project Environmental Impact Statement, Carbon County, Wyoming' (January 1999, FES-98-42) as the coalmine developer for the map area shown in Figure 2.9 (Final EIS, p. 2-2; copy attached). Fourteen years ago, when that EIS was released, the project involved only a commercial coal-mining operation that planned sale of coal to unspecified, off-site buyers. The mining plan of that time involved underground procedures, accessing minable coal that is 250 to more than 800 ft below ground surface (1998 Draft EIS, p. 2-11) along with extensive, adjacent, open-pit strip mining. Elongated, open pits would be required to access coal located as much as 250 feet below the surface (ibid, p. 2-11). Existence of initial, surface-based strip mining (the partially completed 'Elk Mountain Mine') was correctly recognized as essential to subsequent development of the entire, much more extensive, underground mining process (the still-planned 'Saddleback Hills Mine'):

"Main entries [to underground mine components] would be initiated at the base of the highwalls exposed by surface mining and would follow the Johnson Seam down to approximately 600–800 ft, where most underground mining would occur" (Draft EIS, p. 2-39) [emphasis added].

ADDITION OF A DEPENDENT FACILITY

That straight-forward mining proposition changed dramatically in September 2007. At that time, Houston-based Medicine Bow Fuel & Power, LLC (MBFP) submitted an application to Wyoming's Industrial Siting Council (ISC, a component of DEQ) proposing construction of a coal-to-liquids (CTL), industrial-conversion facility within the same area considered in BLM's FES-98-42. The anticipated conversion plant, however, would utilize markedly reduced tonnages of the coal resources evaluated in BLM's EIS, as indicated on the mine map submitted as part of

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MBFP's permit application (p. 3 of Appendix F; copy attached) to ISC. The ISC approved the areally more limited mine plan of Appendix F, as submitted, in 2008. JAN 22 2013

WHO HAS BEEN PERMITTED FOR WHAT?

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Has DEQ been keeping careful track of who has been permitted for what purpose? Clear understanding of relevant corporate alliances associated with this project becomes highly important when considering which companies have been granted permits. MBFP is 100% owned by DKRW Advanced Fuels, LLC (also of Houston), which in turn is 24% owned by Arch Coal, Inc. (of St. Louis), under which Arch of Wyoming, LLC (of Hanna) is a subsidiary. Those intertwined financial linkages (as well as the fact that all unfolding discussion here involves the same geographic area and the same 'Johnson Coal Seam' for mining) would cause any reasonable person to assume that closely coordinated functional planning would be absolutely essential between coal mining by Arch of Wyoming and MBFP's CTL-based industrial operations now under consideration. In confirmation of that assumption of functional interdependence between MBFP and Arch, on March 4, 2009 Wyoming's DEQ approved authorization of MBFP's application to DEQ's Air Quality Division for Permit CT-5873. Relevant wording (p. 1) in that approval is:

"The Division of Air Quality of the Wyoming Department of Environmental Quality has completed final review of Medicine Bow Fuel & Power, LLC's application to construct *an underground coal mine* and industrial gasification and liquefaction (IGL) plant that will produce transportation fuels and other products" [emphasis added].

That authorization by a division of DEQ occurred *after* DEQ's Industrial Siting Council granted its 'Order' (on January 16, 2008) in approval of MBFP's permit application. And *prior* to ISC's granting of its Order, yet another agency allied to DEQ, the Wyoming State Engineer's Office, issued its 'Final Opinion' (on October 9, 2007) of water adequacy for a combined mining and CTL project. The Final Opinion included the following relevant wording (p. 2):

"Medicine Bow Fuel and Power plans to *construct a coal mine* that will produce approximately 3.2 million tons of coal per year and a coal-to-liquids (CTL) plant that will use the coal to produce approximately 13,000 barrels of diesel fuel per day" [emphasis added].

Based on wordings within those official documents, there really can be no doubt that the State of Wyoming's Department of Environmental Quality—before, during, and after approval of this CTL project—visualized MBFP/DKRW (which is 24% owned by Arch Coal, Inc.) as being in charge of the *coal-mining project*, providing essential feedstock for conversion to transportation fuel. The reality, however, is quite otherwise. And, as alluded to below, problems of coordination between coal mining versus CTL facets of this project demand evaluation.

COORDINATION BETWEEN COAL-SELLER AND COAL-BUYER/USER

Despite obvious necessities for close coordination between the coal-providers and CTL-related coal users, one may justifiably question, even now—more than two years after DEQ

LQD

ADMINISTRATOR, LQD, DEQ

January 18, 2013

Page 4

JAN 22 2013

formally recognized 'commencement of construction' of the MBFP facility—whether MBFP has consummated a firm agreement for coal purchase from the appropriate seller adequate for project-long operation of its CTL facility. As indication that such a problem exists, Public Notice No. 4663 (published December 2012) makes no mention of a CTL facility associated with the application for amendment of Arch of Wyoming's underground mining plan. More importantly, the proposed CTL plant is nowhere mentioned directly in Mining Permit 730-T2 or in the application for its amendment beyond:

"A coal handling system at the Saddleback Hills Mine east portal facilities area also will deliver coal to a *separate proposed* industrial facility located adjacent to the east portal (Carbon Basin Mines Permit, 2012)" [emphasis added].

And in reading each individual report contained within the current amendment application, there exists no discussion of coordinated planning among the chief corporate players. I documented egregious examples dealing with physical practicalities resulting from poor coordination in my letter of January 9, 2013 to leadership of Wyoming's Industrial Siting Division.

SUBTRACTION AND ADDITION IN PLANNING A MINE

A preceding paragraph mentioned existence of MBFP's mine map as presented (p. 3 of Appendix F; see attachment) in the 2007 project application to ISC. Such a document, which accompanied sworn testimony used by members of ISC as a fundamental component in its decision-making process, must be taken seriously. That map differs in three crucially important ways from Arch of Wyoming's mine plan as considered in BLM's now-expired, Final EIS: (1) underground mining is no longer planned in sections 21–24 of T. 21 N., R. 80 W. or in section 19 of T. 21 N., R. 79 W.; (2) all open-pit strip mining is removed from project planning; and (3) the northeastern buffer area (i.e., secs. 16–17 of T. 21 N., R. 79 W.) is eliminated from use in the project. No explanations accompany those three elements of project reductions within MBFP's permit application or hearing testimony. Neither were those reductions subsequently questioned by ISC (or DEQ in general) prior to issuance of its Order of January 16, 2008 granting authorization for MBFP to commence construction of the CTL facilities. The amount of coal authorized to date by ISC for use in the MBFP project is limited to source areas exhibited in its application's mine plan (in Appendix F).

Mine reductions '1' and '2' as cited in the preceding paragraph raise signal concerns about the adequacy of coal to support this CTL project through its originally proposed lifespan. First, note that in BLM's EIS of the late '90s (see DES-98-32, Table 2.12, p. 2-37), recoverable coal from planned *surface* sources totals c. 31.1 million tons and: "Of the 197.1 million tons of underground-minable coal, 88.02 million tons (45%) would be recovered" (DES-98-32, p. 2-28). Secondly, following MBFP's unexplained rejection of strip mines combined with reduction (by approximately 50%) of area dedicated to *underground* mining, only about 44 million tons of coal has been allocated to this project's use. Very conservatively, coal needs for conversion to gasoline at the average output rate of 11,000 barrels per day across 30 years would demand in excess of 60 million tons.

LQD

JAN 22 2013

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From the outset, therefore, the ISC had authorized construction of an anticipated 30-year project characterized by an estimated 16 million-ton coal deficit. Now note that plans by Arch of Wyoming expressed in the current application for amendment specify increase of the mine's duration to 39 years (i.e., underground mining from 2013 to 2052). Concerned individuals should be able to assume that both of the following items have importance in Wyoming's industrial regulatory considerations: (1) statements in a permit application as approved by the ISC; and (2) absence of evidence for a firm commitment of coal sales to a dependent buyer/user of that coal. But in the existing situation, the amount of coal (including BLM-administered sections) authorized to MBFP for extraction from the specified Saddleback Hills Mine is seriously inadequate to support the CTL project as currently visualized by MBFP and DEQ.

The December 2012 Public Notice states: "The permit amendment includes [the addition to the mining area of] sections 17 and 19, T21N, R79W and Sections 21, 22, 23, and 24, T21N-R80W." With exception of section 16 of T. 21 N., R. 79 W., the sections now requested in the amendment to be added for underground mining are precisely those inexplicably absent in MBFP's 2007 permit application to ISC (see attachment). The request to return these sections to the mine appears to be a way to correct major errors in MBFP's planning (followed by the state's own approval of those flawed mine plans). Nevertheless, reintroduction of the sections for mining by Arch of Wyoming would have little relevance to the CTL plant's needs for additional coal: (1) in the absence of a completed contract between coal-provider and coal-user; or (2) unless DEQ passes some form of amendment that overrides its original forms of project approval. In either case, as highlighted within comments in document '6' (listed at the beginning of this letter), the grossly uncoordinated timing between Arch's open-pit excavations and MBFP's CTL construction/operations would make MBFP's planned project nearly impossible.

TRUCKING, RAILROADING, OR BOTH?

According to plans in coal-mining Permit 730-T2 (activated December 2012):

"Coal is hauled from the Carbon Basin Mines by highway trucks via Wyoming State Highway 72 to the existing Arch of Wyoming, LLC Seminoe II coal handling facility near Hanna, Wyoming until the coal handling system is installed at the Saddleback Hills Mine east portal facilities area" (MP Intro-1).

MBFP's permit application approved by ISC makes no mention of having coal hauled by truck to existing loading facilities near Hanna, even on a temporary basis. Also, its planned earnest needs for local coal begin in 2016, nearly two years prior to the planned date for *initiation* of excavation for development of the underground mine. It is also odd that Arch of Wyoming's Mine Plan involves off-site coal-hauling by truck during the early years, whereas MBFP's plans imply development of a railroad spur from Medicine Bow to eastern parts of the project area. Uses to which the railroad spur are to be put (and its longevity) remain unexplained.

SUBSIDENCE

On a different subtopic, the following sentence in the Public Notice is misleading: "Subsidence from underground mining is anticipated to occur in 2014." As written, an

impression is conveyed that subsidence would be limited to but a single calendar year. According to WDEQ-CHIA-30 of Permit 730-T2 (p. 19):

“The initial subsidence is predicted to occur within weeks or days of longwall mining, with the surface deformation becoming mostly complete within one or two years after mining, depending on the rate of movement of the longwall. The maximum subsidence is approximately 12 feet, assuming a mining height of 14 feet.”

One might ask, however, what is the meaning of “mostly complete” in terms of subsidence. After all, the lesser-magnitude underground mining below the city of Rock Springs, Wyoming was terminated in 1963, and local but recently active subsidence involves passages dug by hand in the 1800s. Experience elsewhere, therefore, suggests that sporadic subsidence following underground mining in the Carbon Basin can be expected to continue well over 50 years. With local thicknesses of the Johnson Coal Seam varying between 0 and 30 feet, anticipated subsidence from mining-related roof-collapse can be expected to result in a highly irregular ‘pot-and-kettle topography’ (see DES-98-32, Table 2.18, p. 2-57). And the subsidence would affect more than 7,000 acres of existing topography, roughly half of which currently is wildlife-rich and regularly cattle-grazed public land administered by BLM (DES-98-32, Fig. 1.3, p. 1-5). Subsidence also would extend laterally approximately 400 feet beyond underground limits of excavated mining panels (section 4.1.5.2 of FES-98-42, p. 4-2).

In further consideration of land subsidence resulting from this project, another ‘Public Notice’ *jointly* issued (May 2, 2012) by the Wyoming Regulatory Office of the U.S. Army Corps of Engineers (USACE) and Wyoming’s DEQ has strong relevance. It deals with an additional application from Arch of Wyoming, LLC for a permit (under provisions of Section 404 of the Clean Water Act of 1972, as amended) to undertake coal-mining activities in this same area of the southern Carbon Basin. The second page of the jointly released notice states:

“Figure 5 depicts waters of the U.S. within Saddleback Hills mine. There are seven underground units covering 6,832 acres. Second and Third Sand Creeks and tributaries are above the mine units. The stream network covers 9.4 acres and there are 1.94 acres of wetland in that area. *The mining operation should have no effect on these surface waters but the mine plan includes a contingency for managing any subsidence that may occur.* Figure 6 (MP-16) illustrates the plan for restoration of Third Sand Creek after a subsidence event” [emphasis added].

I suggest the compound sentence emphasized above is wholly indefensible. The more than 7,000-acre upland landscape that assuredly would be affected by subsidence from underground mining today exhibits naturally occurring topographic- and drainage-complexities. The post-mining inevitability of a half-century of irregular surface collapse, averaging depression in excess of ten feet below existing levels and associated with pervasive shattering of underlying, collapsed strata would create technical challenges for drainage reclamation intended to restore environmentally beneficial vegetation and appropriate wildlife habitat. I emphasized the suite of complexities related to subsidence on pages 3 and 4 of a letter (June 25, 2012) to the Program Manager of USACE’s Wyoming Regulatory Office. An up-to-date reclamation plan would

LQD

JAN 22 2013

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demand genuine technical sophistication to deal with projected complexity of the post-project situation. I do recognize that the current Mine Plan (Reclamation Plan, p. RP1-6) states:

“Reclamation (revegetation) does not imply restoration, which is the returning of the land to replicated conditions that existed prior to mining.”

Nevertheless, one should not, without challenge, let the above-quoted assertion slide by that underground mining—which would cause more than 10 vertical feet of highly irregular subsidence across an area exceeding 7,000 acres through an interval of at least 50 years—would have “no effect on these surface waters.” Also, the proposed ‘management’ cited would be almost completely cosmetic, being little more than smoothing out the top few feet of surface irregularities and filling the upper parts of cracks (extending from depth to the surface) using heavy equipment.

MISSING INFORMATION

The map for the Saddleback Hills Mine (underground) in the joint USACE–DEQ notice (of May 2012) has another feature worthy of emphasis. The stated “mine permit area” clearly shows proposed underground mine-panel locations within sections 17 and 19 of T. 21 N., R. 79 W. and sections 21, 22, 23, and 24 of T. 21 N., R. 80 W. Recall that those are the very sections that Arch of Wyoming *now* (i.e., published December 2012) requests, by way of an addendum, as additions to its mining permit. Also, remember that, despite the physical necessity of open-pit strip mines to development of the underground mine, neither the mine plan submitted in MBFP’s 2007 permit application to ISC nor MBFP’s 2012 project Update involves surface-based mining procedures.

Related to issues of coal contracting discussed above, neither the current Public Notice (‘No. 4663’) nor the document jointly issued by USACE–Wyoming DEQ makes even a passing mention of an on-site, industrial CTL-purpose for the mining of coal. Both documents refer only to operations relating to mining. Members of the public, therefore, would be given wholly incorrect impressions by both documents that the mines would exist solely to serve standard off-site commercial consumption of the coal. The intricacies of commercial or environmental problems introduced by addition of CTL-related activities are entirely ignored. In my opinion, the public deserves far more directness and clarity of communication from its state agencies than these documents provide.

MAJOR CHANGES

Indeed, environmental considerations of this project became almost infinitely more complex when CTL-conversion became superimposed onto the standard requirements for coal mining. And the above-summarized, independently verifiable litany of confusion, obfuscation, or perhaps simple administrative ineptitude should give serious pause to potential commercial investors or to those citizens who value wise use and long-term environmental health of Wyoming’s open spaces and public lands. As presently configured, this project stirs complex, potentially dangerous technologies into a stew of inadequate coal, probable volumetric inadequacy of waters from the briny ‘Mesaverde aquifer,’ and multiple forms of environmental

LQD

JAN 22 2013

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hazards that were not even considered in the late twentieth century when the most recent, relevant EIS was configured.

Unquestionably, enormous changes (constituting ‘material events’ affecting the entire project) in projected use of the affected land have been wrought since BLM released its Final Environmental Impact Statement in 1999, applicable exclusively to routine coal mining in the southern Carbon Basin. The State of Wyoming authorized construction of a previously unconsidered CTL facility in early 2008 and yet, even today, new complexities of the combined project—which involve significant components of *federal* lands—are proceeding in absence of an EIS that is compliant with existing standards demanded within the National Environmental Policy Act (NEPA; 1969, as amended). That represents more than a procedural embarrassment for Wyoming’s citizenry. It also represents an acknowledged, intentional dismissal of a legally required, basic tool designed to better understand the range of long-term effects upon physical and biological landscapes prior to effecting proposed major alterations. Such dismissal should not be tolerated, either by federal-state-county ‘regulators’ or by American citizens, who are entitled to expectation of governmental administrative protection.

EXAMPLES OF KEY REMAINING UNANSWERED QUESTIONS

In November 2009, the U.S. Department of Energy (DOE), with BLM then having expressed interest in becoming a ‘cooperating agency,’ initiated development of a U.S. taxpayer-supported, comprehensive EIS for this project (*Federal Register*, v. 74, p. 62290–62292). But not even a draft version of their effort has been released for public scrutiny. DOE will not release any form of information about status of this EIS to common citizens. Some other federal agency (and probably BLM), therefore, must pick up the dropped ball and compose an up-to-date, NEPA-compliant EIS subject to public review. Absence of any appropriate EIS for guidance, in combination with the following selected *examples* of still unresolved project-dependent issues, argues against justification either for: (1) approval of the requested addendum to the Saddleback Hills’ underground mining permit; or (2) furtherance of construction of the CTL project itself:

1. Considering inadequacy of permitted, recoverable coal to serve the projected magnitude and longevity of CTL conversion, why does administrative support for the project persist?
2. What would be the actual mining plan, including rational scheduling, once the addition of a CTL facility is seriously coordinated within it?
3. When will reliable data on adequacy/yield of the water supply (from test wells that actually *reach* the ‘Mesaverde aquifer’) for combined mining, CTL activities, and on-site worker housing be made accessible?
4. What effects or functional constraints will be introduced to the mine and to the CTL facility through use of brine waters characteristic of the local ‘Mesaverde aquifer’?
5. What, really, will be the more than century-long impacts on drainages, their dependent wetlands, the native flora/fauna, and ranch use of the extensively fractured, ‘pot-and-

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JAN 22 2013

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- kettle topography' to be created across more than 7,000 acres of subsidence following the underground, retreat-style, longwall-panel system of mining?
6. Where are the required evaporation ponds to be placed, and how/where are the inevitably accumulated toxic evaporitic sediments to be disposed of?
 7. Taking adequate environmental analyses, technical evaluations, and actual completion of CTL-process engineering into account, what would be a *realistic* schedule for completion of project-construction?
 8. When will adequate considerations of underground mineworker safety be taken into account in light of newly available geological information on the magnitudes, sources, and nature of jointing, faulting, and folding in strata of the Hanna Formation destined for mining?
 9. When will adequate emergency services (i.e., rapid-response teams for mine collapse, fire, explosion, medical emergencies, and law enforcement) come into existence?
 10. As to the proposed 'on-site housing' serving more than 1,000 construction workers plus support staff, where will this largest town within 50 miles of the CTL site be placed, when will its mention be accompanied by genuine facilities planning, what would be the environmental and social impacts of the diverse needs associated with adequate functioning of that new town, what is the schedule for its demolition, and what would be the nature of its reclamation?
 11. Exactly where will infrastructural basics such as pipelines and additional power lines be sited, and what will be the impacts of their construction and prolonged existence?
 12. What would be the justification for, and environmental impacts and roadway necessities of, the truck-based transportation of initially mined coal to loading facilities in the vicinity of Hanna as specified in the recently activated mining permit from DEQ?
 13. When will plans for the proposed railroad spur from Medicine Bow to the plant site be evaluated for environmental and economic impacts and be permitted for construction?
 14. Assuming that strip mines do after all become part of the mine plan for the CTL facility in this project, where is the wisdom in placing the CTL facility itself (characterized by operations involving miles of high-pressure, high-temperature pipelines and associated chambers, superheated volatile gases, and stored gasoline) directly adjacent to a *subsequently excavated* (probably requiring blasting), roughly 200 foot-high, strip-mine highwall?
 15. Does there really exist an adequate enhanced-oil-recovery market for the prodigious total output of CO₂ expected from this project, or will large quantities of this greenhouse

ADMINISTRATOR, LQD, DEQ

January 18, 2013

Page 10

LQD

JAN 22 2013

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gas require risks of disposal through unproven geological sequestration at depth or direct venting into the atmosphere?

CONCLUDING RECOMMENDATION

Excerpts from documents brought together here have revealed many forms of inappropriate regulatory management in this combined mining and CTL project. Too many basic questions remain unanswered about the project to warrant its continuation in the absence of substantive review. **Thus, prior to going any further with various administrative approvals and construction of this southern Carbon Basin combined mining and CTL project, a comprehensive analysis in the form of a federally administered environmental impact statement compliant with up-to-date standards demanded by the National Environmental Policy Act must be completed and publicly evaluated.**

Sincerely yours,



Jason A. Lillegraven, Ph.D.

Citizen

State of Wyoming Professional Geologist,

License Certificate No. PG-24

attachments:

Mine map, Figure 2.9 from BLM Final EIS (FES-98-42, January 1999)

Mine map, page 3 of Appendix F from MBFP Permit Application to ISC (November 2007)

copies to:

Acting Director's Office, BLM Washington Headquarters

BLM Field Offices, Rawlins and Rock Springs

Wyoming Governor's Office

Wyoming Attorney General's Office

Wyoming Business Council's Office

others having interest

JAN 22 2013

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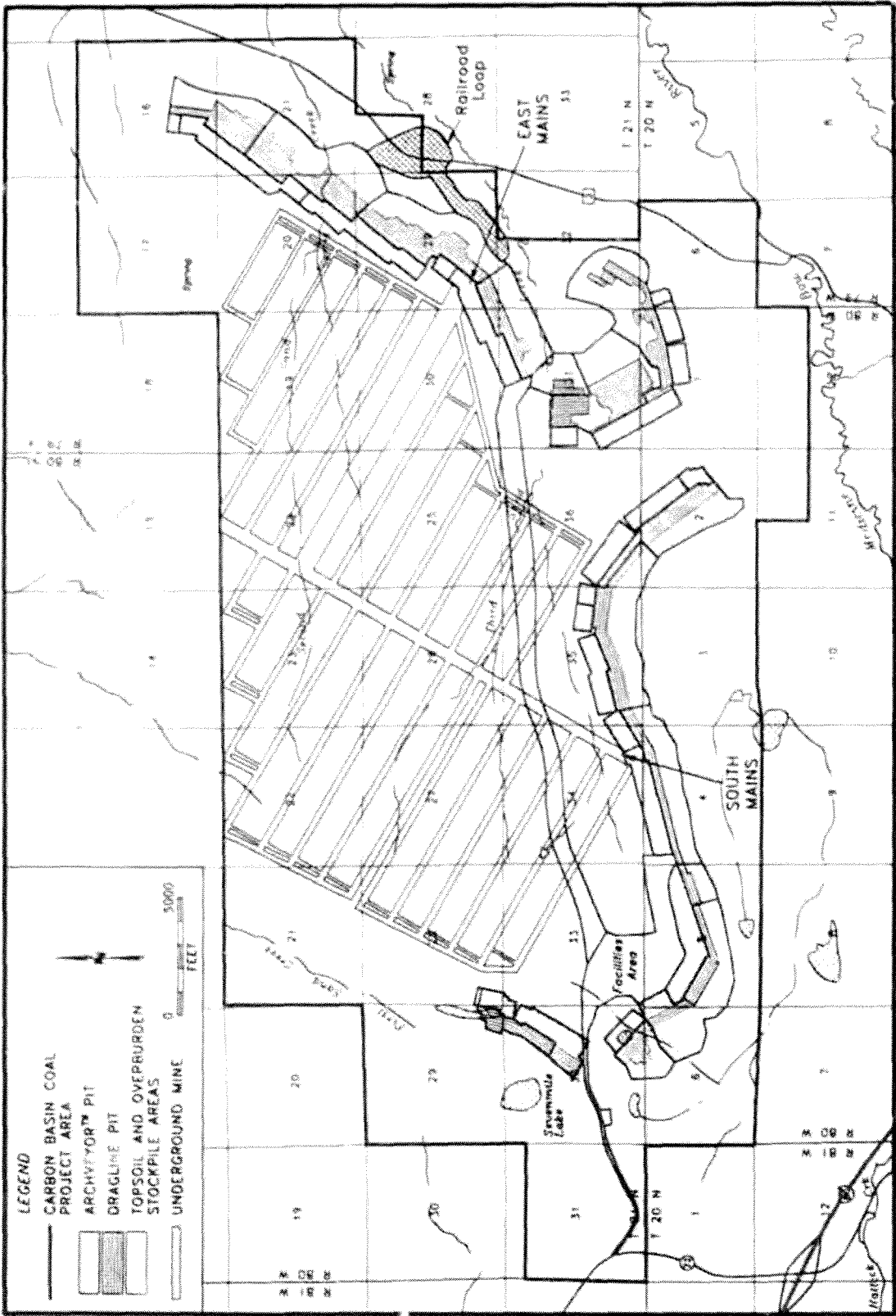
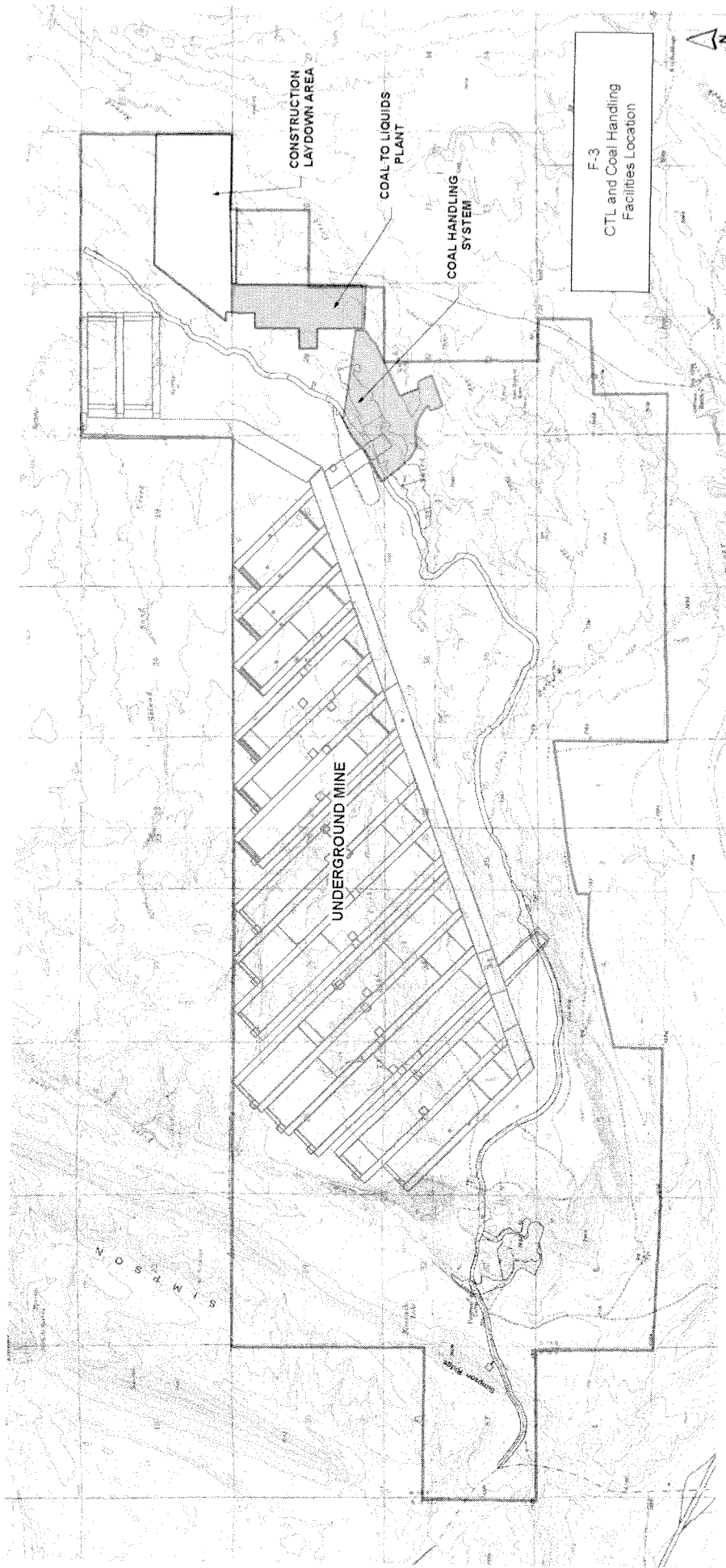


Figure 2.9 Generalized Mining Plan, Elk Mountain and Saddleback Hills Mines.

29



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JAN 22 2013

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