



State of Utah

DEPARTMENT OF NATURAL RESOURCES

MICHAEL R. STYLER
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Division of Oil, Gas and Mining

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Division Director

June 16, 2017

Patrick Collins, Resident Agent
Mt. Nebo Scientific, Inc.
P.O. Box 337
Springville, UT 84663

Subject: Midterm Permit Review, Wellington Prep Plant, Price River Terminal, LLC, C/007/0012, Task ID #5430

Dear Mr. Collins:

On April 5, 2017 Division of Oil, Gas and Mining (the Division) had commenced a midterm permit review for the Wellington Prep Plant.

The midterm review has now been completed and will now be closed; however, the Division has identified deficiencies that must be addressed. The deficiencies have been included with this letter (See Attached). The name of the author for each of the respective deficiencies has been provided.

Your response to these deficiencies will need to be submitted as an amendment to your MRP and will be processed as a separate task. Please submit the required amendment with the accompanying C1 and C2 forms by no later than July 28, 2017.

If you have any questions regarding these requirements or the Midterm Review process, please don't hesitate to call me at 801-538-5350.

Sincerely,

Steve Christensen
Permit Supervisor

SKC/ss

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GARY R. HERBERT
Governor
GREG BELL
Lieutenant Governor

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Technical Analysis and Findings
Utah Coal Regulatory Program

PID: C0070012
TaskID: 5430
Mine Name: WELLINGTON PREPARATION PLANT
Title: MIDTERM PERMIT REVIEW

Summary

On April 5th, 2017, the Division of Oil, Gas and Mining (the Division) initiated a midterm review of the Wellington Prep Plant Mining and Reclamation Plan (MRP). The review of each active permit during its term is performed in accordance with R645-303-211. The following review items were identified in the midterm commence letter:

- A. Review of the Plan to ensure that the requirements of all permit conditions, division orders, notice of violations (NOV), abatement plans, and permittee-initiated Plan changes approved subsequent to permit approval or renewal (whichever is the most recent) are appropriately incorporated into the Plan document.
- B. Ensure that the Plan has been updated to reflect changes in the Utah Coal Regulatory Program which have occurred subsequent to permit approval or renewal.
- C. Review applicable portions of the permit to ensure that the Plan contains commitments for application of the best technology currently available (BTCA) to prevent additional contributions of suspended solids to stream flows outside of the permit area.
- D. Evaluate the compliance status of the permit to ensure that all unabated enforcement actions comport with current regulations for abatement; verify the status of all finalized penalties levied subsequent to permit issuance or permit renewal, and verify that there are no demonstrated patterns of violation (POV). This will include an AVS check to ensure that Ownership and Control information is current and correct.
- E. Evaluate the reclamation bond to ensure that coverage adequately addresses permit changes approved subsequent to permit approval or renewal, and to ensure that the bond amount is appropriately escalated in current-year dollars.
- F. Evaluate the permit for compliance with variances or special permit conditions.
- G. Conduct a technical site visit in conjunction with the assigned compliance inspector to document the status and effectiveness for operational, reclamation, and contemporaneous reclamation practices undertaken on predetermined portions of the disturbed area to minimize, to the extent practicable, the contribution of acid or toxic materials to surface or groundwater, and to otherwise prevent water pollution.
- H. Review and inspect the currently approved Vegetative Reference Areas pursuant to R645-303-356. The review will ensure reference areas continue to represent the success standards of revegetation.

Deficiencies Details:

General Contents

Identification of Interest

Analysis:

The MRP does not meet the State of Utah R645 requirements for Identification of Interests.

Beginning in Section 1.20 of the MRP, the Permittee identifies the Permittee, Operator and respective Owners of the Wellington Prep Plant facility. The MRP identifies Price River Terminal, LLC (PRT) as the owner. The information provided identifies Sunoco Partners Marketing & Terminals, L.P. as owning 55% of PRT. 33.6671% is owned by Global One Transport. It's unclear as to the ownership of the remaining 11.33%. R645-301-112.300 requires the name address and telephone number of each business entity in the applicant's and operator's organizational structure. The Permittee must clarify who or what entity owns the remaining 11.33% of Price River Terminal, LLC.

The Permittee must identify/clarify who the Operator of the site. On page 5 of Section 1.20, Watco Transloading, LLC is identified as the Operator of the site; however, the MRP notes that Watco Transloading, LLC only performs work related to the oil transloading process. The Operator who will be performing mining and reclamation activities must be clarified in the MRP.

The Permittee must update the information provided in Section 1.20. The updates to include any changes in the officers and directors and ownership associated with the ownership structure of Price River Terminal, LLC. It's common for officers/directors to leave organizations or for ownership structures to change over time. In the event that there are no changes to either the officers and directors and ownership, the Permittee may indicate that in the cover letter to the Division in response to this mid-term review.

Deficiencies Details:

The MRP does not meet the State of Utah R645 requirements for Identification of Interests. The following deficiencies must be addressed prior to final approval:

R645-301-112, -112.300: The Permittee must clarify who or what entity owns the remaining 11.33% of Price River Terminal, LLC (i.e. the remaining ownership beyond the 55% owned by Sunoco Partners Marketing & Terminals L.P. and the 33.6671% owned by Global One Transport, Inc.).

R645-301-112: The Permittee must update the information provided in Section 1.20. The updates to include any changes in the officers and directors and ownership associated with the ownership structure of Price River Terminal, LLC. It's common for officers/directors to leave organizations or for ownership structures to change over time. In the event that there are no changes to either the officers and directors and ownership, the Permittee may indicate that in the cover letter to the Division in response to this mid-term review.

R645-301-112: The Permittee must identify/clarify who the Operator of the site is. On page 5 of Section 1.20, Watco Transloading, LLC is identified as the Operator of the site; however, the MRP notes that Watco Transloading, LLC only performs work related to the oil transloading process. The Operator who will be performing mining and reclamation activities must be clarified in the MRP. If the owner and operator are Price River Terminal, LLC, simply revise this section to reflect this.

schriste

Violation Information

Analysis:

The application meets the State of Utah R645 requirements for Violation Information.

An Evaluation of the Wellington Prep Plant C/007/0012 was generated on the OSM Applicant Violator System on 5/31/17. No outstanding violations, forfeitures or suspensions were listed.

ssteb

Legal Description

Analysis:

The MRP does not meet the State of Utah R645 requirements for providing an accurate legal description.

The property description and acreage is shown in the MRP, Ch.1, Pg, 4 and consists of 1573.5 acres. The legal description described has multiple errors and must be corrected.

The property description was mapped by the Division on GIS ESRI 10.3 and was verified to match the permit boundary as shown on map E9-3341 (Permit Areas and Facilities Map).

Deficiencies Details:

The MRP does not meet the State of Utah R645 requirements.

The Permittee must correct and amend the MRP legal description so it is accurate, clear and concise pursuant to R645-301-121.200. Upon correction of the legal description in the MRP, the permit issued by the Division must also be corrected accordingly.

Ireinhart

Permit Term

Analysis:

The MRP does not meet the State of Utah R645 requirements for Permit Term.

In section 116.100 of the MRP, the Permittee discusses the initiation of reclamation of the on-site coal material. The Permittee must revise section 116.100 of the MRP to reflect current coal mining and reclamation operations. At the time this section was approved by the Division, a plan for removal of on-site coal material had not been finalized. The sections discusses how PRT had been approached by several companies interested in the coal fines, but were waiting for quality data prior to entering into an agreement. Please revise this section with a discussion of the on-going reclamation of the slurry material.

Deficiencies Details:

The MRP does not meet the State of Utah R645 requirements for Permit Term. The following deficiency must be addressed prior to final approval:

R645-301-116.100: The Permittee must revise section 116.100 of the MRP to reflect current coal mining and reclamation operations. At the time this section was approved by the Division, a plan for removal of on-site coal material had not yet materialized. Please revise this section with a brief discussion of the current on-going reclamation of the slurry material so the MRP is up to date.

schriste

Environmental Resource Information

Vegetation Resource Information

Analysis:

The MRP does not meet the State of Utah R645 requirements for identifying success standards to be used for reclamation success.

As part of the mid-term review, the Division reviewed the currently approved Vegetative Reference Areas pursuant to R645-303-356. The review is conducted to ensure reference areas continue to represent the success standards of revegetation.

Because the Wellington Prep Plant has been in operation since 1958 (Prior to SMCRA), no baseline was obtained before the area was disturbed. However, quantitative information has been gathered on the surrounding plant communities that most likely existed prior to disturbance. The permit area consists of three primary plant communities. The rolling hills of Mancos Shale soils predominately supported an Atriplex-Hilaria (Shadscale-Gallenta) plant community. Many of the minor drainages supported an Artemisia-Hilaria (Black sage-Gallenta) community. The major drainages or valleys supported Sarcobatus-Suaeda (Greasewood-Alkali seepweed) community.

The MRP indicates Map F9-178, 179 shall be used to identify the location of the reference areas. The map shows two reference sites that represent a greasewood (*Sarcobatus*) plant community and shadscale-gallenta (*Atriplex confertifolia/Hilaria*) plant community. Since the riparian area is so small, the Division approved the success standard for the riparian area to be the greasewood reference area. Reclamation standards will be evaluated using methods approved by the Division and will evaluate Cover, Shrub Density, Frequency, Production, and Diversity.

As noted in Section 3.41, page 54, standards for success will include criteria representative of unmined lands. However, Map F9-179 indicates the reference area identified for the greasewood reference site appears to have been disturbed and used for rock storage. The Permittee indicated that the map is erroneous and will be updated to include the correct location as well as provide geographic coordinates.

The Permittee has verbally committed to conduct a qualitative analysis of the reference sites during the 2017 growing season. A report with photographs will be submitted to the Division for review and inclusion to the MRP.

Approximately 392 acres have been disturbed (Section 3.41, page 1). Three different seedmixes are proposed to be used for final reclamation. These seedmixes are designed to enhance the pre-disturbance and surrounding plant communities by adding opportunities for a more diverse plant community and improve wildlife and grazing forage. The MRP provides the following three seedmixes. However, only seedmix A and B are shown on the map to be seeded. Therefore, Map F9-178, 179 must be updated to show where seedmix C shall be seeded.

Seedmix A- *Atriplex-Hilaria* (Shadscale-Gallenta) Community
Seedmix B- *Sarcobatus-Suaeda* (Greasewood) Community
Seedmix C- Riparian Community (Grass/Forb/Shrub mix)

Deficiencies Details:

As noted in Section 3.41, page 54, standards for success will include criteria representative of unmined lands. However, Map F9-179 indicates the reference area identified for the greasewood reference site appears to have been disturbed and used for rock storage. The Permittee stated the map is erroneous and will be updated to include the correct location as well as provide geographic coordinates.

The Permittee has verbally committed to conduct a qualitative analysis of the reference sites during the 2017 growing season. A report with photographs will be submitted to the Division for review and inclusion to the MRP.

Map F9-178, 179 must be updated to show where seedmix C shall be seeded.

The MRP loses information between pages 6 & 7 which must be reconciled and corrected.

Ireinhart

Fish and Wildlife Resource Information

Analysis:

The MRP does not meet the State of Utah R645 requirements for a protection and enhancement plan for fish and wildlife protected under the Threatened Endangered Species Act.

On 5/30/17, the U.S. Fish and Wildlife Service, Information for Planning and Consultation (IPaC) website was used to evaluate federally protected species within the permit area. There are six (6) protected species within the area. They are: Mexican Spotted Owl, Yellow-billed Cuckoo, Bonytail Chub, Colorado Pikeminnow, Humpback Chub, and Razorback Sucker. There are no critical habitats identified in the permit area. The Division requested an official species list letter as part of the Section 7 consultation process. This letter is dated May 30, 2017 with consultation Code: 06E23000-2017-SLI-0307 and may be located in the CTS.

Fish and wildlife are discussed throughout Chapter 3, Section 3.11, and the Division of Wildlife Resources Publication No. 78-16, Appendix A. This publication does not address all species currently listed. However, it does evaluate the Yellow-billed Cuckoo and notes it is a summer resident of the project area. This bird only nests in the riparian wildlife habitat; therefore, such areas are of critical value to the maintenance of this species and will not be disturbed. The MRP must be updated to include protection and enhancement measure for the Yellow-billed Cuckoo. The Mexican Spotted Owl is not evaluated in the MRP but requires wooded canyons with narrow side canyons which are not present within the permit area.

The permit area drains into the Price River which flows into the Green River and ultimately into the Colorado River. Fish habitat is discussed in more detail on pages 5-9. However, it appears the MRP has never been updated to account for the Upper Colorado River Endangered Fish Recovery Program to satisfy the 1996 BO for Colorado River Fishes.

Deficiencies Details:

The MRP does not meet the State of Utah R645 requirements.

The Permittee must update the MRP to comply with the Upper Colorado River Endangered Fish Recovery Program to satisfy the 1996 BO for Colorado River Fishes. Section 3.33 page 3 indicates there is a water withdrawal rate but it the narrative does not explain what that rate is and how it may affect the protected fish. The most appropriate location for this information is located in Section 3.33, page 6, "Protection of Threatened and Endangered Species" or Section 3.34, page 69 "Special Wildlife Protection Requirements".

The Permittee must address protection and enhancement measures for the Yellow-billed Cuckoo since it is a summer resident of the permit area and is protected under the Threatened and Endangered Species Act. The most appropriate location in the MRP is "Protection of Avifauna", Section 3.33, page 4 or "Protection of Threatened and Endangered Species, page 6.

Ireinhart

Land Use Resource Information

Analysis:

The MRP meets the State of Utah R645 requirements for land use.

The current Land Use map is identified as E9-3343 (1). The approved PMLU is the same as the premining land use, "undeveloped with limited grazing". Although it should be noted the permittee has shown interest in changing the PMLU to industrial (which is consistent with adjacent properties).

Ireinhart

Operation Plan

Air Pollution Control Plan

Analysis:

The MRP meets the State of Utah R645 requirements for Air Quality.

The Utah Department of Environmental Quality, Division of Air Quality (DAQ) issued small source exemption for the Price River Terminal, LLC on March 25, 2015 (DAQE-EN154560001-15). If there are any changes in the operation such that there is an increase in emissions they must notify DAQ for an approval order.

Ireinhart

Air Pollution Control Plan

Analysis:

The amendment meets the State of Utah R645 requirements for Air Pollution Control Plan.

In March of 2015, the Division approved a reclamation plan for the slurry, fine material located on-site. As part of that review, a commitment was provided that indicated if the removal of the aforementioned material was anticipated to exceed 1,000,000 tons per year, the Permittee would submit an air pollution control plan to address applicable state regulations.

Based on correspondence with Rusty Netz (Sunnyside Cogen Resident Agent), 150,000 tons were removed from the site in 2015. 130,000 tons were removed in 2016. 30,000 tons have been removed to date in 2017.

schriste

Topsoil and Subsoil

Analysis:

The Permittee has met the requirements of R645-301-233.100 to demonstrate that selective overburden materials may be used as a supplement to topsoil, however this achievement brings new elements to the mining and reclamation plan.

The 2016 sampling of re-exposed, buried soils, over eleven re-mined acres verify that these soils are the best available in the permit area and can be used as cover/topsoil substitute. Three soil samples were taken of the 11 acres of re-exposed soil in the upper refuse basin. Each sample was a composite of 48 inches of the soil profile. The three composite soil samples indicate that the soil is loam to silty loam in texture, with slightly alkaline pH. The SAR values of 4.66 and 5.36 in the South half of the re-exposed soil (Figure 1) are rated Fair. This soil is dominated by Mg and Na cations. This combination may create impervious soil and reduced availability of calcium, a major plant nutrient. This soil would benefit from calcium addition and a complete fertilizer (containing the macronutrients N:P:K) application, since potassium, is also severely lacking in this soil. Photos that accompany the soil report show the soil to be compacted and massive in structure. In addition to contour ripping and organic matter additions to improve soil aggregation, the reclamation plan could include the introduction of rhizobium and mycorrhizae treated seed to build soil structure.

If these soils are now proposed for use as substitute topsoil/cover material, than the requirements of R645-301-234.300 (to protect and enhance these soils in place) apply. Using four feet of soil from 11 acres could provide 70,986 CY of the total 1,034,400 CY cover required for the upper and lower refuse ponds (p. 1, Sec 2.41). Whether or not the soils are utilized for substitute topsoil, stabilization of exposed areas is required by R645-301-244.100.

As re-mining has progressed, some areas of the upper refuse pond have been determined to be undesirable (6/12/2017, personal communication with Steve Christensen regarding mid-term inspection). These areas must also be sampled from 0-4 feet to provide information on the chemical characteristics of the mining waste remaining. The Permittee should map and sample these areas for the next sampling event in 2021.

Deficiencies Details:

As a result of re-mining, the Permittee has uncovered suitable soil for reclamation purposes. In accordance with R645-301-234.230, R645-301-234.200 and R645-301-244.100, The Permittee must update the MRP with plans to stabilize, protect and enhance the re-exposed 11 acres for use as substitute topsoil/cover.

pburton

Hydrologic General

Analysis:

The MRP does not meet the State of Utah R645 requirements for Water Monitoring.

The Permittee must revise the MRP to provide a clear and concise presentation of the baseline and operational water monitoring conducted at the site. The revision must include clarifications/revisions to the text as well as tables (Table 7.24.2 and Table 7.24.5) to clearly present the water monitoring sites (identified by site name), the frequency of their monitoring, the water quantity, field and laboratory water quality parameters to be obtained at each and the frequency of their collection (i.e. quarterly, baseline collection frequency, flow only, etc.). See the analysis discussion for more detail.

The baseline monitoring requirements for both ground and surface water need to be clarified (i.e. frequency/timing and parameters to be analyzed). Upon review of the text of the MRP, it's unclear as to when baseline data is to be collected. In more recent years, baseline data has been obtained during the 1st quarter of 2004, 1st quarter of 2009, then the 3rd quarter of 2014. Why the baseline data collection changed from the 1st quarter to the 3rd quarter is unclear. Discussions with the Permittee and former hydrologists have indicated that the baseline parameters are to be collected in the year preceding permit renewal. However; it's unclear upon review of the MRP if that is the case.

The most recent permit renewal (5-year term) was approved in November of 2014 (Task ID #4649). Thus, the next permit renewal will be in November of 2019. If the aforementioned baseline data collection trigger were accurate (i.e. to be collected the year prior to the 5-year permit renewal), the next baseline collection would need to occur in 2018. It's unclear as to what quarter the baseline data collection would take place. Additionally, based on more recent historical data, it appears that baseline was to occur in the 1st quarter of the permit renewal year, but that changed to the 3rd quarter in 2014 (of the year of permit renewal and not the year previous to permit renewal). The Permittee must clarify the baseline data collection discussion in the MRP.

Table 7.24.2 and Table 7.24.5, provide the ground and surface water quality parameter lists respectively. The Permittee

must revise the tables to provide more clear and concise presentation of the parameters to be analyzed for baseline and operational water monitoring (both for ground and surface water). Discrepancies have been identified between the water quality data collected for baseline and operational monitoring. For example, Table 7.24.2 identifies dissolved molybdenum as both a baseline and operational water monitoring parameter for ground water. However; based on the data provided by the Permittee, dissolved molybdenum has historically only been analyzed during baseline data collection.

Additionally, the Permittee must revise Table 7.24.2 and Table 7.24.5 to identify: the water monitoring sites by name, the frequency they are to be sampled and the required water quality and quantity parameters.

Baseline discussion appears to be missing. Baseline appears to be collected in the year preceding the permit renewal. Based on the data set, the next baseline collection event would be 3rd quarter 2019.

Deficiencies Details:

The MRP does not meet the State of Utah R645 requirements for Water Monitoring. The following deficiency must be addressed prior to final approval:

R645-301-731.200: The Permittee must revise the MRP to provide a clear and concise presentation of the baseline and operational water monitoring conducted at the site. The revision must include clarifications/revisions to the text as well as tables (Table 7.24.2 and Table 7.24.5) to clearly present the water monitoring sites (identified by site name), the frequency of their monitoring, the water quantity, field and laboratory water quality parameters to be obtained at each and the frequency of their collection (i.e. quarterly, baseline collection frequency, flow only, etc.). See the analysis discussion for more detail.

schriste

Hydrologic Sediment Control Measures

Analysis:

The MRP meets the State of Utah R645 requirements for Sediment Control Measures.

Sediment control measures are discussed beginning on page 1 of Section 7.42 of the approved MRP. In order to minimize the potential for additional contributions of sediment outside the permit area, the Permittee utilizes a drainage system comprised of diversion ditches that route storm water runoff to sedimentation ponds. Additionally, for small drainage areas, the Permittee utilizes Alternative Sediment Control Areas (ASCA's). The ASCA's utilized at the site are discussed in the Siltation Structures: Other Treatment Facilities section.

The primary sediment control measures utilized on the property are sedimentation ponds. Table 7.42.1 provides a the respective drainage areas, 10-year, 2-hour design storm event and resulting runoff and the curve number utilized for designing and sizing each of the sediment ponds. During the mid-term field visit, each of the sediment ponds was inspected. With the exception of the Clear Water Pond, the ponds were dry with no standing water. The embankments of the ponds as well as the inlets and outlets were observed to be in good condition and functioning as designed.

schriste

Hydrologic Siltation General

Analysis:

The MRP meets the State of Utah R645 requirements for Siltation Structures: Other Treatment Facilities.

Beginning on page 1 of Section 7.25, the Permittee discusses the Alternative Sediment Control Areas (ASCA's) utilized at the site. Seven ASCA areas (numbered #1 through #7) are shown on drawing Dwg F9-177. The disturbed acreages that report to the ASCAs and calculated storm water runoff are provided in Volume II- Hydrology Appendix. The ASCA areas were developed for small runoff areas that could not readily report to a sediment pond. The ASCA methods utilized include: straw bales, silt fences, straw erosion control waddles, vegetation and/or surface gouging. Typical installation of the various ASCA methods are provided beginning on page 3 of Section 7.25.

On page 2 of Section 7.25, the Permittee states, "Erosion control measures will be inspected, cleaned and repaired following significant rainfall events and at no time will be non-functional or ineffective in preventing additional contribution of

suspended solids to the stream flow or runoff outside the permit area". During the mid-term field inspection, the ASCA areas observed were found to be stable and not displaying evidence of instability or excessive erosion.

schriste

Reclamation Plan

Bonding Determination of Amount

Analysis:

The midterm review of the MRP does not meet the State of Utah R645 requirements for Determination of Bond Amount because no updated midterm bonding estimates have been provided by the Permittee.

The Division requires an evaluation of the reclamation cost estimate during each midterm permit review. This cost estimate is then escalated for five years or until the next midterm review. In accordance with the requirements of R645-303-211, R645-301-830, and -301-830.140, it is the Permittees responsibility to provide detailed estimated cost sheets to support the reclamation cost estimate.

Deficiencies Details:

The midterm review of the MRP does not meet the minimum requirements of R645-301-830.140 due to missing information as that the Permittee has not submitted updated bond information in regards to the midterm review of the MRP.

The Permittee must update the unit cost data used in the 2012 Midterm Permit Review reclamation cost estimate to 2017 unit costs using the 2017 R.S. Means Heavy Construction Cost Data manual. All computation sheets for demolition, earthwork and re-vegetation must be updated and submitted to the Division so the Division can determine the required bond amount needed through 2022.

In accordance with R645-301-830.410, Division Technical Directive 007, and Office of Surface Mining Handbook for Calculation of Reclamation Bond Amounts the Permittee may utilize third party contractors for cost references when a general cost references does not adequately describe the required reclamation task. In the event the Permittee utilizes local third party contractors cost estimates within the reclamation bond amount additional information must be submitted with the application including a minimum of three individual quotes for the work. References may include items such as a letter or email transcript but must include all relevant contact information from the contractor so that the Division may contact said contractor to verify unit cost is valid in the event the Division was the hiring personal. References must be submitted at the time the reclamation bond amount is submitted to the Division. The Permittee will submit detailed cost references for all contracted costs of reclamation.

In accordance with R645-301-830.410, Division Technical Directive 007, and Office of Surface Mining Handbook for Calculation of Reclamation Bond Amounts the Permittee must utilize Overhead and Profit costs when using standardized cost reference manuals such as R.S. Means Heavy Construction. The Division applies an indirect cost of 26.8% that covers Project overhead calculations in the indirect line items of the total sheet. The Permittee will utilize the O&P unit cost when utilizing R.S. Means Heavy Construction cost reference.

The Wellington Prep Plant Midterm review, in accordance with R645-303-211, was commenced on April 5, 2017 by the Division. In accordance with R645-301-830.410, Division Technical Directive 007, and Office of Surface Mining Handbook for Calculation of Reclamation Bond Amounts the Permittee must utilize the dollar year for which the midterm was commenced. The escalation to the next midterm must also be amended to calculate the new escalation to the next midterm review, five years.

The total reclamation cost for the Wellington Prep Plant (sum of the direct and indirect costs) must be escalated from 2017 to 2022 (5 years) using an escalation factor of 1.00.

This escalated cost is rounded up to the nearest \$ 1,000 to determine the amount of required bond which must be posted with the Division by the Permittee.

bwiser