

Via e-mail [DEQCoal@mt.gov](mailto:DEQCoal@mt.gov)

May 5, 2021

Robert Smith  
Coal and Opencut Mining Bureau  
Montana Department of Environmental Quality  
PO Box 200901  
1218 East 6th Avenue  
Helena, MT 59620-0901

Permit ID: C1979012  
Revision Type: Minor Revision  
Permitting Action: Application  
Subject: MR262 Permit Transfer from Spring Creek Coal LLC to  
Navajo Transitional Energy Company, LLC

Dear Bob:

The purpose of this letter is to respond and address Round 2 of deficiency comments on MR262, Responses to November 30, 2020 comments are as follows:

**ARM 17.24.303(1)(c) and (d):** The review for this section will be finalized once the executed transfers/lease assignments for NTEC have been provided.

The following coal lease transfer documents have been loaded to Admin / Legal Right to Enter

- [303\\_Addm-o-12\\_BLM\\_LeaseCoal\\_MTM094378\\_MR262\\_20210505.pdf](#)
- [303\\_Addm-o-13\\_PRIVATE\\_LeaseCoal\\_Scrutchfield\\_MR262\\_20210505.pdf](#)
- [303\\_Addm-o-14\\_BLM\\_LeaseCoal\\_MTM069782\\_MR262\\_20210505.pdf](#)
- [303\\_Addm-o-15\\_BLM\\_LeaseCoal\\_MTM088405\\_MR262\\_20210505.pdf](#)
- [303\\_Addm-o-18\\_BLM\\_LeaseCoal\\_MTM110692\\_MR262\\_20210505.pdf](#)
- [303\\_Addm-o-19\\_BLM\\_LeaseCoal\\_MTM110693\\_MR262\\_20210505.pdf](#)

**ARM 17.24.303(1)(i):** Please update MDEQ-IEMB to MDEQ-COMB in document 303.1.u\_OtherPermits\_MR262\_20200218. Additionally the NPDES Permit MT-0024619 is not under COMB, but under WPB and will need to be updated accordingly. Please provide the addresses for each Regulatory Agency listed.

The requested corrections have been made and loaded to Admin / Other Permits.

**ARM 17.24.303(1)(o):** Please provide the fully executed leases/assignments.

Refer to the response of ARM 17.24.303(1)(c) and (d) above.

**ARM 17.24.303(1)(t)**: Please provide the updated insurance document in this section.

[The insurance document has been loaded to Admin / Insurance.](#)

**ARM 17.24.303(1)(x)**: The comment period for the public notice should be updated to 15 days for a transfer, not 30 days.

[The corrected document has been loaded to Admin/Proof of Insurance](#)

**ARM 17.24.304(1)(b)**: Unless Spring Creek can provide an acceptable reason that the signing authority form is confidential, it will need to be uploaded as requested under the bond section of this system.

[The signing authority documents have been moved to the Reclamation / Bond Calculation section.](#)

This cover letter is saved in the "Reports/Correspondence" section. There is no change to the TOC or Drawing Index with this revision.

Please feel free to call if you have any questions.

Thank you,

A handwritten signature in blue ink that reads "Laura Ackermann". The signature is fluid and cursive, with the first name "Laura" and last name "Ackermann" clearly distinguishable.

LAURA ACKERMANN

NTEC Manager, Environmental & Regulatory Affairs  
Spring Creek Mine

cc: CF 5.02.4 (SCM-2020)