

FOUNDATION COAL WEST, INC.

Belle Ayr & Eagle Butte Mines
P.O. Box 3039
Gillette, WY 82717-3039



February 4, 2008

Cara Keslar
Air Quality Division
Herschler Building
122 West 25th Street
Cheyenne, WY, 82002

RE: Supplemental Information for June 29, 2007 High Wind Event Eagle Butte Mine

Dear Ms. Keslar;

Eagle Butte received an information request from the Air Quality Division (AQD) related to the above mentioned June 29, 2007, High Wind Event. The following are responses to specific comments contained in the AQD letter.

AQD Comment 1: Detailed description of sources contributing to the exceedances. In the documentation package you have identified "inactive operational areas" as sources of anthropogenic dust on June 29. A more detailed description of these areas is needed to understand which inactive areas were contributing dust. Additionally, more detail will help the Division understand what additional BACM is appropriate for these areas.

Response: Inactive operational areas are active pit areas such as the backfill haul roads and overburden benches that were not being utilized during the high wind event. On June 29, 2007, an evaluation of the areas generating the dust was conducted and reactionary methods were implemented to focus operations on hauling overburden short and to lower benches with less wind exposure. Inactive benches and haul roads in the active pit can still be a source of dust during high wind events however the focus during the event is directed at measures or activities that have the largest impact on reducing dust. On June 29, activities were directed away from active pit areas with longer hauls and benches with increased wind exposure.

AQD Comment 2: Detailed description of Additional Best Available Control Measures (BACM) in place at the time of the exceedances. The BACM discussion provided in the packet is vague. Please supply a detailed description of BACM in place on the southern end of the mine. Please highlight BACM in place in areas identified as anthropogenic sources on June 29. This may be done through a narrative or on a map.

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Response: The response to Comment 1 above provides some clarification on the June 29 anthropogenic sources of dust. However, to be more specific on BACM measures in place in the southern areas of the pit please note that it is routine practice at Eagle Butte to stabilize pre-strip areas. This is typically done regardless of the size of an area. In the fall of 2006, Eagle Butte stabilized approximately 171 acres by either ripping or temporary seeding in these pit advance areas. With respect to reclamation, when possible Eagle Butte schedules final grading and topsoil replacement concurrently to minimize the amount of time acres are open to wind erosion. In 2007, Eagle Butte deferred reclamation activities on approximately 100 rough graded acres that are currently stabilized with temporary vegetation until such time the area can be final graded, topsoiled and permanently vegetated in a single growing season. This was pre-planned to reduce the amount of time the area is open to wind erosion. Note that Eagle Butte requires contractors who conduct topsoil stripping and replacement to control dust by watering. No topsoil movement activities occurred on June 29.

Other measures implemented include the treatment of several roads with MgCl. These include the main coal haul road, industrial coal haul road and access roads to two scoria pits. Negotiations with a CBM operator also resulted in the treatment of an access road adjacent to the mine.

It is important to mention again that the data provided with respect to the haying operation shows that without this non-mining related activity the exceedance would not have likely occurred.

Hopefully the above response to comments clarifies the initial submittal of information. If you have any questions regarding the information please feel free to contact me at 307-687-3308.

Sincerely,



Mark Thrall
Environmental Engineer

Cc: File
Tanner Shatto, AQD Sheridan