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January 24, 2017

Via Federal Express

Kyle Wendtland, Administrator
Department of Environmental Quality
Land Quality Division
200 W. 17th Street
Cheyenne, WY 82002

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**RE: Ramaco LLC/Brook Mine Permit
Landowner: The William Long Family Revocable Trust,
dated March 28, 2003
Sheridan County, Wyoming**

Dear Mr. Wendtland:

This law firm represents Barbara Glicksberg ("Successor Trustee"), Successor Trustee of The William Long Family Revocable Trust, dated March 28, 2003 (the "trust"). The trust's property located in Sheridan County, Wyoming, is in an area near lands owned by other private landowners which could be affected by the proposed Brook Mining Company Permit. I received on behalf of the Successor Trustee the Public Notice regarding this action. The Successor Trustee directed me to submit this letter on her behalf, as her attorney. The settlors of the trust, William Long and Olga Long, resided on this property for many years prior to their deaths (Olga died in 2003; William died in 2010). They operated those lands agriculturally, in addition to residing there, and the trust provides that the lands are to be distributed to their grandson (which distribution will occur soon).

I am in receipt of a copy of the current mine plan submitted by Ramaco LLC. The purpose of this letter is to issue a written objection to the proposed mine permit on behalf of the Successor Trustee, who shares in the concerns expressed by similarly affected landowners, including the following:

1. **Substantially Incomplete Mine Plan.** The mine plan has changed or been revised numerous times whereby the proposed mine has changed from an operation purportedly employing 200-400 workers to now employing 18-20 workers. Further, initial projections in the plan were that up to ten million tons of coal per year would be mined; whereas, now the plan has been revised to mining coal of only two million tons in the first few years. In simple terms,

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local landowners are not clear on exactly what the current mine operation will entail as the current mine plan does not adequately address specific issues, such as: Where will the load-out facility be located? Where will infrastructure facilities be located? What type of "mobile crusher" will be used? How will the coal be transported and to what locations? How many trucks will be on the road, how often, and what route will they take? How often will blasting occur and what are the hours of operation? Who specifically will be conducting the mine operations and what experience do they have in this type of operation (We understand that Mr. Woodring will be merely a "consultant")? Does Ramaco have a buyer/market for its coal?

2. **Ramaco's Mining Experience in Wyoming.** Other coal companies conducting business in Wyoming have a history of operating their mines in cooperation with local landowners and in compliance with local, state, and federal rules, regulations, statutes and procedures. It is our understanding that some landowners in this area have encountered a lack of cooperation from and conflicts with Ramaco personnel on the ground, which exhibit anticipated relationships with Ramaco during its future mining operations. Because the Successor Trustee resides in the State of Oregon and is thus an absentee owner, she is unsure whether the trust property may have been accessed by Ramaco without her express permission due to these actions we have learned about from other area landowners.
3. **Soil Subsidence Issues and Sinkholes.** As we understand it, there have been geological surveys conducted in this area regarding the effects of coal mine subsidence in Sheridan County, specifically with respect to the area where Ramaco's mine operation will occur. The landowners in the area, including the Successor Trustee, are extremely concerned about subsidence, soil disturbance, and sinkhole issues considering how extensively this area has been mined. The mine plan does not adequately address these issues, including the possibility of re-igniting underground coal fires and what measures will be taken for coal fire suppression.
4. **Damage to Water Wells and Foundations.** Affected landowners have substantial concerns that blasting operations may cause damage to the structural integrity of their water wells and foundations of homes and buildings on their property, including increasing drawdown of domestic wells. It is our understanding that documentation exists to show that previous mine operations in this same area caused damage to water wells, with some damage being so extensive that the water wells had to be replaced. There are inadequate provisions in the current mine plan which protect the landowners' ground and

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surface water, including that of the trust's property.

5. **Air Quality, Noise and Light, and Other Health and Environmental Concerns.** The Tongue River Valley area where the affected lands are located regularly sustains high winds. The mine plan does not adequately address dust suppression measures and how mining operations will control the coal dust, dust from trucks and crushers, toxic fumes, emissions from increased truck traffic, and potentially unhealthy air quality emissions due to mining operations. Will there be any restrictions on the hours of operation, especially during high wind events? There is no provision in the mine plan for creating a sound barrier to minimize the noise produced by the mining operations. An effective noise-suppression procedure should be expressed in the plan. There are landowner concerns, including that of the Successor Trustee, about coal dust blanketing the area leaving layers of dust and grime on structures and personal property, including but not limited to homes, buildings, vehicles, and ranch equipment. Many local landowners/ranchers have livestock and horse ranches which could be affected. In addition, we understand that there are health concerns regarding asthma and respiratory conditions which could arise due to mining operations. Lighting from evening mining operations at the mine site could adversely affect the quality of life for residents in this area. The mine plan does not adequately address these health and safety issues.
6. **Proximity of Mine Operations to Interstate 90.** The mine operations are in very close proximity to Interstate 90, a major U.S. interstate highway. The mine plan does not address issues concerning potential damage to highway infrastructure and bridges, dust storms, effects of blasting, etc., on this heavily traveled major thoroughfare.
7. **Potential Pollution and Water Degradation to Tongue River and Adjacent Creeks.** The Wyoming Attorney General's Office has been involved in water law litigation with the State of Montana for well over seven years, which is finally reaching a conclusion. This involved irrigation rights and disputes between the two states regarding the Yellowstone River Compact, including the Tongue River. Given the close proximity of the Tongue River to Ramaco's mining operations, there are serious concerns by landowners (including the Successor Trustee) about sediment runoff, wastewater issues, and potential pollution of waterways. If the Tongue River or adjacent creeks and tributaries are adversely affected by these mining operations, then the State of Wyoming could face further costly and protracted litigation over these issues. The current mine plan does not adequately address these concerns.

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8. **Inadequate Bonding and Reclamation Concerns.** It is our understanding that the bond for Ramaco's permit is only \$375,000. This appears to be wholly insufficient considering the potential for major impacts on air quality, pollution of Tongue River, creeks, irrigation, livestock waterway systems, etc. Considering the substantial increase in truck traffic, damages to county roads (including U.S. Hwy. 345, the Frontage Road adjacent to Interstate 90) and other paved roads, could be very costly to maintain and repair for the county. The approximately ten-mile long trenches associated with this mine plan could certainly require costly reclamation efforts and the current bond surely would not provide compensation to cover anywhere near those costs. Similarly, with the tremendous increase in truck traffic and other traffic from the mines on county roads, including the Frontage Road, and other paved roads in the area, safety concerns for local landowners and members of the public are huge. There is a high potential of someone being injured or killed as a result of the increased truck traffic. Hwy. 345 (Frontage Road to Ranchester) recently was designated with a highway speed of 70 mph. With members of the public (including motorcyclists) traveling at that high rate of speed and slow-moving mine trucks and heavy equipment utilizing that road with great frequency, the possibility of highway accidents is imminent. The mine plan does not address these issues.

9. **Accidents or Environmental Harm.** We understand that Ramaco does not have a history of operating a highwall coal mine, such as what is being proposed in the mining plan. How can adjacent landowners and members of the public be assured that Ramaco is capable of rectifying any potential serious accidents or environmental harm that may occur as a result of its operations utilizing such a coal mine?

We understand that Ramaco has been facing stiff opposition to a similar plan of operation in Nottingham, Pennsylvania, where legislators, affected landowners, and numerous members of the public have been very vocal in expressing their concerns about deleterious effects the mining operation there would have on their quality of life.

10. **Impacts on Irrigation, Livestock, Wildlife, Hunting, Fishing, Recreational Activities.** The Tongue River Reservoir is located downstream from the mine operations and there is a very real potential that the Tongue River Reservoir area could be adversely affected due to pollutants from this mine finding their way to the Tongue River. This would have an adverse impact on members of the public (from Wyoming and Montana) who recreate at the reservoir, including swimming, boating, and fishing. Also, a substantial number of

ranchers in the area within close proximity to the mining operations have irrigation rights and conduct agricultural operations. If the waterways, ditches, drainages, and reservoirs become polluted, then the livelihood of a great many people in the area will be drastically affected, including impacts on livestock watering systems. In addition, this area has abundant wildlife which could also suffer from the adverse effects of the mining operation.

11. **Black Diamond Trail Designation.** In addition to the prospect of the mining operations affecting the area valley designated as an Alluvial Valley Floor, in September, 2012 the area along the Frontage Road between Sheridan and Rancheater (Hwy. 345) was designated as the Black Diamond Historic Mine Trail by the Sheridan Community Land Trust and the Wyoming Historic Preservation Work Group, in conjunction with the Wyoming State Historic Preservation Office and Wyoming State Parks and Cultural Resources. Although not clearly defined in the mine plan, this area along the Frontage Road will likely sustain substantial truck traffic and, as a result, would be impacted by dust, other air quality issues, road damage, etc., all which may have an adverse effect on this historic trail designation. There are no provisions in the current mine plan addressing this historic designation to ensure its protection.
12. **Kleenburn Recreation Area.** The Kleenburn Recreation Area, which is in extremely close proximity to the mine operations (just east of the Acme exit off Interstate 90) is owned and operated by Sheridan County. The Wyoming Game and Fish is involved in stocking the ponds which provide members of the public the opportunity to fish for trout, largemouth bass, catfish and perch. Since its inception a few years ago, this recreation area has provided a countless number of people, including tourists, with many hours of recreation, fishing, educational and recreational field trips for local school children, canoeing adventures, hiking, and many other forms of recreation. Potential pollution (air and water), noise, light, dust and truck traffic will greatly impact this area and pose adverse effects on the health and safety of not only local residents but members of the public at large. The mine plan does not adequately address this issue.
13. **Adverse Effect On Property Values and Quality Of Life.** Local landowners, including the Successor Trustee, are very worried about serious impacts on property values if the current mine plan is approved, and they are equally concerned about threats to their quality of life (and the Successor Trustee about that of the beneficiary who is to be the successor in interest to the trust property). Numerous landowners in this area (including this trust)

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whose property values could substantially diminish would result in a significant reduction in the tax base for Sheridan County. The Successor Trustee believes that adverse effects from the mining operation will not only diminish property values, but more importantly will endanger public health and safety and create a public nuisance.

14. **Viability of the Mine Operation.** Landowners in this area, including the Successor Trustee, are quite skeptical that the extraction of ten million tons of coal per year under this plan is even viable. It is our understanding that the most that Big Horn Coal Company ever extracted near this area was approximately four million tons per year. Given the potential for major detrimental impacts from Ramaco's proposed operation, as outlined above, is it really worth approving the Ramaco coal mining permit application?

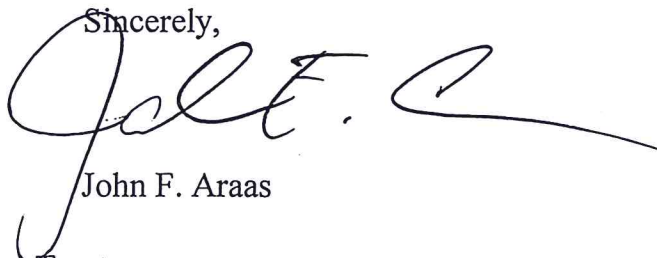
Although Ramaco LLC holds the rights to develop the coal in the proposed area, the Successor Trustee has legitimate concerns (on behalf of herself and the trust beneficiary to receive this property) regarding the mining operation under its current plan causing permanent and irreparable harm to a pristine area rich in history which has been enjoyed by Wyoming families (including the Long family) for generations. A number of books and articles have been published in recent years in an effort to promote and preserve the heritage of this region.

Promises to provide an unrealistic number of jobs in an economically depressed area should not be the incentive for approving an operation which may prove to be devastating to this community and the State of Wyoming over the coming years. Several of the issues and concerns identified above have not been addressed, or have not been adequately addressed, in Ramaco's mining plan, and they represent a public nuisance to local property owners as well as significant threats to public health and safety.

The Successor Trustee hereby requests an informal hearing with the Director of the Wyoming Department of Environmental Quality on this matter.

Thank you for your time and attention.

Sincerely,



John F. Araas

cc: Barbara Glicksberg, Successor Trustee

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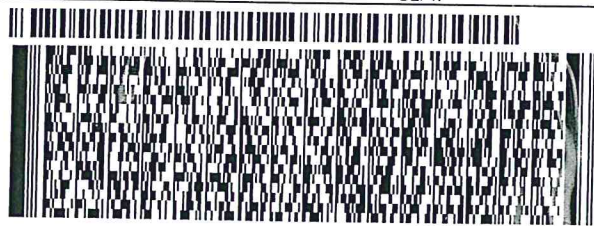
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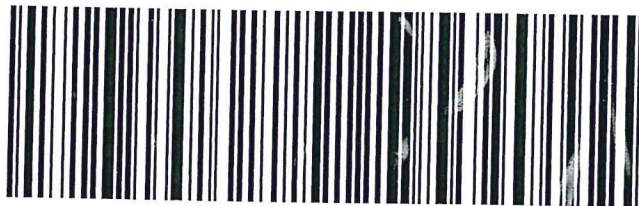
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