

Brenda Lindlief-Hall  
P.O. Box 8261  
Missoula, MT 59807  
(406) 459-8309 (phone)  
406-728-8878 (fax)  
blh@blhmtlaw.com

---

May 17, 2017

Todd Parfitt, Director  
Department of Environmental Quality  
200 W. 17th St. 4th Floor  
Cheyenne, WY 82002  
307-777-7937  
[todd.parfitt@wyo.gov](mailto:todd.parfitt@wyo.gov)

Exhibit 90

**VIA EMAIL ONLY**

Re: Proposed Brook Coal Mine on the Tongue River in Sheridan County, Wyoming

Dear Director Parfitt:

I write on behalf of the Tongue River Water Users' Association in Montana to voice its objections to issuance of a permit to Brook Mining Co., LLC for the proposed Brook Mine in Sheridan County, Wyoming. We understand Brook Mining Co., LLC's parent company is Kentucky-based Ramaco, LLC.

**INTERESTS OF THE TONGUE RIVER WATER USERS' ASSOCIATION**

The Tongue River Water Users' Association (TRWUA) is an association of farmers and ranchers who irrigate with the waters of the Tongue River in Montana once those waters flow out of Wyoming. TRWUA's members use Tongue River water to irrigate crops such as alfalfa and other grasses and forage to feed their livestock, and they also raise other crops including fruits and vegetables. As you know, the Tongue River Reservoir, which lies just north of the Wyoming border, impounds the waters of the Tongue River in Montana for irrigation, domestic use, stockwater and other uses by TRWUA's members. TRWUA's members rely on plentiful, high quality water to irrigate their crops, most of which are sensitive to the salts held in the coal formations Ramaco/Brook Mining Co. proposes to mine. The salts in the coal veins are also very damaging to soil structures, and can cause irreparable damage if applied to the soil.

**WATER QUALITY AND WATER QUANTITY ISSUES**

TRWUA's primary objection to permitting the proposed Brook Mine is the hydrological impacts it would have on both the water quality and water quantity of the Tongue River. We understand that the mine plan provides that the first trench will be mined near the confluence of Goose Creek and the Tongue River, which causes grave concerns. We also understand that the dewatering section of the mine plan indicates that the coal seams to be mined have high moisture content. There will clearly be issues related to dewatering, including hydrological impacts to the River, its tributaries, and connected groundwater systems. There will undoubtedly be discharges of highly saline and sodic waters to the Tongue River and Goose Creek, resulting in salt loading

Brookline Environmental Quality  
100 Brookline Avenue  
Brookline, MA 02146  
(617) 735-3300  
100 Brookline Avenue  
Brookline, MA 02146

100 Brookline Avenue  
Department of Environmental Quality  
100 Brookline Avenue  
Brookline, MA 02146  
100 Brookline Avenue  
Brookline, MA 02146

Dear Director:

I am writing on behalf of the Town of Brookline, Massachusetts, regarding the proposed Brookline Sewerage Treatment Plant. We understand that the proposed plant is located on the site of the former Brookline Sewerage Treatment Plant.

### Background

The Town of Brookline, Massachusetts (TOWN) is an association of independent members who manage and maintain the water supply system for the Town of Brookline. The TOWN is a member of the Massachusetts Water Resources Association (MWRA) and has a long history of providing water and sewerage services to the Town of Brookline. The TOWN is currently providing water and sewerage services to the Town of Brookline through the Brookline Sewerage Treatment Plant. The TOWN is currently providing water and sewerage services to the Town of Brookline through the Brookline Sewerage Treatment Plant. The TOWN is currently providing water and sewerage services to the Town of Brookline through the Brookline Sewerage Treatment Plant.

### Request for Information

The TOWN is currently providing water and sewerage services to the Town of Brookline through the Brookline Sewerage Treatment Plant. The TOWN is currently providing water and sewerage services to the Town of Brookline through the Brookline Sewerage Treatment Plant. The TOWN is currently providing water and sewerage services to the Town of Brookline through the Brookline Sewerage Treatment Plant. The TOWN is currently providing water and sewerage services to the Town of Brookline through the Brookline Sewerage Treatment Plant. The TOWN is currently providing water and sewerage services to the Town of Brookline through the Brookline Sewerage Treatment Plant.

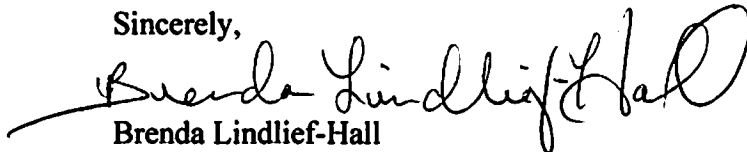
and sedimentation of those waterbodies. And there will clearly be groundwater drawdown and associated impacts to the Tongue River and its tributaries, among other problems. These impacts will adversely affect the waters of the Tongue River that flow into Montana and which TRWUA's members rely on to sustain their farming and ranching operations.

There appears to be a discrepancy between Ramaco's projections for the life of the mine and the projections stated in the mine plan. Ramaco is apparently projecting it will be mining about 6-8 million tons of coal for about 20 years, while the mine plan indicates it will be producing for 10-12 years. This alone raises significant questions about the extent of the impacts to the Tongue River and its tributaries and to interconnected groundwater resources. If mining will actually occur for 20 years instead of 10 or 12, the impacts on water resources will obviously be far more pronounced. Under any mining scenario, however, we object based on the foreseeable, adverse impacts mining will have on the Tongue River, its tributaries, and connected groundwaters.

#### CONCLUSION

TRWUA opposes permitting the Brook Mine. The quality of the waters of the Tongue River and its tributaries have been already been compromised by discharges of highly saline water from the coal aquifers during coalbed methane (CBM) development, including through direct discharges, leaking pits and ponds, and runoff from lands where "managed irrigation" has been used as a disposal method for highly saline CBM wastewater. Because the Wyoming DEQ's permitting decision and mining operations will impact the water TRWUA's members rely on for irrigation and to sustain their farming and ranching operations and way of life, it would appreciate an opportunity to comment on, and participate in, the permitting process.

Sincerely,



Brenda Lindlief-Hall

Attorney for Tongue River Water Users' Ass'n

cc: Tom Livers, Director, Montana Department of Environmental Quality

Pat Tyrrell, Wyoming State Engineer

Art Hayes, Jr., President, Tongue River Water Users' Association

and reduction of those... And there will likely be... The... will... on to...

There appears to be... and the... about 8-10 million... This... to the... will... on the... and...

CONCLUSION

TRWA opposes... and its... will... on...

Respectfully,

James...  
President, Fort... River...

The... of...

For Further...

For Further...