

86 Monarch Road
Ranchester, WY 82839
April 23, 2020

Deputy Director
Department of Environmental Quality
Land Quality Division
200 West 17th Street
Cheyenne, WY 82002

Re: Ramaco Brook Mine

Dear Sir:

We would like to object to the issuance of a Permit To Mine for the Ramaco Brook Mine as it is currently described in the permit document on file with the Department of Environmental Quality - Land Quality Division. As landowners within ½ mile of the permit boundary, we have concerns about detrimental impacts to our property. We believe that these concerns should be addressed before a Permit to Mine is issued.

In the previous public comment period, we commented on the fact that the groundwater model used to predict mining impacts showed that our wells would be affected. We commented and testified in the hearing about the potential deleterious effects that any change would have due to the limited domestic water supply from our wells particularly in drought periods. Apparently, Ramaco and the DEQ have decided to address our concerns by ignoring them. The current permit document doesn't include our wells on the list of impacted wells and their removal is not discussed in the permit document. The drawdown maps in the current document are identical with the exception of removal of the one- and two-foot drawdown contour lines (presumably to make it less obvious that our wells would be affected), so we can only assume that the impacts would be the same, also.

Ramaco's subsidence consultant recommended that they leave one foot of coal at the top and bottom of the mined seams because the upper and lower strata are too weak to prevent collapse of the roof or failure of the bearing strength of the floor during mining. Ramaco has chosen to ignore this recommendation, probably because over much of the mine area, the seams are so thin that they are not actually feasible to mine even at full removal. This will increase the risk of post-mining subsidence if the theoretical pillar design proves to be incorrect. We are also still concerned that the pillar design to prevent subsidence won't be followed. Since the mining is done by remote control with no human presence and regulators can't inspect what is done, the mine operator will be tempted to double or triple production with no increase in fixed costs by removing all of the coal and not leaving pillars. The temptation will be even greater since the cost of mining at this site will be many multiples greater than any other coal mine in the state. Ramaco does commit to monitoring the surface for subsidence, but by the time it is detected on the surface it is obviously too late to do anything about it. Subsidence from previous mines in the area with seams at similar depths, even though they were supposedly much more prone to collapse than the Brook Mine, often didn't begin to appear until 50 to 70 years after mining had ceased.

Increased subsidence on our property is still a concern. We have new subsidence sinkholes developing over the Monarch Mine on a regular basis. Blasting associated with the Brook Mine, because it is so near to our property, will increase the frequency and volume of this subsidence.

We are still concerned about traffic on existing public roads. The yearly production is about a quarter of what was originally proposed, but will still result in a major increase in traffic on the existing state highway and county roads. Travel on these roads can already be dangerous at times due to heavy truck traffic from Tongue River Stone.

Ramaco Carbon's press releases this spring indicated that they are planning to produce carbon fiber from coal tar. Production of coal tar from coal and production of carbon fiber from coal tar are both heavy industrial processes involving toxic chemicals and, as such, would not be allowed under the light industrial zoning that Ramaco obtained for their property at Kleenburn. We are wondering where this production would occur and if it will be done on the mine site. If so, these facilities should be shown on the mine facilities map.

Ramaco has made a number of comments in the press about how they have been scrutinized more than any other mine permittee. In fact, this assertion is incorrect. The amount of baseline data collection and other work that they have done for this permit application is significantly less than other mines in the state. The reason that they have gone through so many rounds of comments is because they have continually tried to redefine the very minimum amount of data collection and analysis work required to get a permit. If they had actually been scrutinized to a greater extent than other mines, that scrutiny would have been totally appropriate. This is the only coal mine in the state that is within a few hundred feet of a major interstate highway and is within a few hundred feet of one of the major rivers in the state and is within a few hundred yards of numerous residences and is within a few hundred yards of hundreds of private water wells and is adjacent to areas that have previously been underground mined where subsidence of the surface is likely to be exacerbated by Ramaco's activities.

We could provide numerous additional comments regarding this ill-conceived mine, but we will stop here in the interest of brevity. Thank you for the opportunity to submit these comments.

Sincerely,

John P. Buyok

Vanessa Buyok

cc: Mr. Nick Siddle, Chairman
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