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North Fork Bentonite Project (WYW-168310)

Certified Mail No: 7010 2780 0001 8567 4897  
Return Receipt Requested

Black Hills Bentonite, LLC  
Attn.: Bruce Lawson  
P.O. Box 9  
Mills, WY 82644

Subject: **Second Completeness Review Determination for North Fork Mine Plan of Operations**

Dear Mr. Lawson:

The BLM Buffalo Field Office (BFO) received the new North Fork Bentonite Mine Plan of Operations (Mine POO, or Mine Plan) on October 17, 2011, from Black Hills Bentonite, LLC (BHB). BFO notified BHB of the items still deficient in this Mine POO via Certified Mail on November 16, 2011. BFO received responses from BHB to these deficient items between January 30, 2012, and March 18, 2012.

We have conducted a second completeness review of the North Fork Mine Plan of Operations in accordance with 43 CFR 3809.401, utilizing these responses. The Mine POO has been found to still not be complete (per 43 CFR 3809.401). Identified below are those items still remaining incomplete, per 43 CFR 3809.411(a)(2). Note that the format follows that of the original deficiency letter, but only those items still deficient are indicated. Please submit the identified deficiencies within 30 calendar days.

**2) Description of Operations:**

**ii. Preliminary or conceptual designs, cross sections, and operating plans:**

**h. BLM original determination:** No description is provided for what operations are to occur when, or how, or what piece(s) of equipment will be used to perform which operation(s). Please describe when and how vegetation, topsoil, and overburden removal will take place, as well as mining of bentonite, drying of bentonite, and reclamation activities.

**BHB original response:** *Refer to Mine Plan Section 1.5, Mine Plan Section 3.0, Section 3.1, Section 3.2, and 3.4 Bentonite removal, handling and processing is covered in Sections 3.5 and 3.6 of the Mine Plan. Mining sequence and schedule is discussed in Section 3.7 of the Mine Plan. The Mine Plan Section 6.3, Hours of Operation, Routes of Haulage, Access Routes and Estimated Truck Traffic, provides additional information regarding the schedule and scope of mining activities on the NFAA. Reclamation activities are covered in Sections 2.0, 3.0, 4.0, 5.0 and 13.0 of the Reclamation Plan.*

**BLM second determination:**

1. Table D5-1 in Appendix 5 ("Topography, Geology, and Overburden"), "Overburden Analysis," is lacking explanations for the abbreviations used therein.

*Table D5-1 has been revised to include information explaining the abbreviations used therein. A revised copy of Table D5-1 is enclosed.*

2. Table D7-1 in Appendix 7 ("Soils"), "Topsoil Laboratory Analyses...", is mistitled in the electronic version, and also contains several apparently internal notes in the upper margin. Please check that this version is the same as the printed version, and re-submit updated copies, if needed.

*Disregard the electronic version of Table D7-1. The printed version is the correct table.*

3. The Federal Government is listed in Appendix A (p. A-2) as mineral owner for two 40-acre parcels with BLM-administered surface in the North Fork Mine POO. However, BHB's statement in the Mine Plan (Section 1.4, page MP-2) that "Mining will commence upon approval from the WDEQ/LQD" is at least partially incorrect. Mining on privately-owned surface/Federally-owned mineral lands may commence upon approval from the WDEQ/LQD. Mining on BLM-administered surface/Federally-owned mineral lands may not commence until approval is provided by the BLM, usually through approval of a Mine POO. Please update the statement.

*Section 1.4 of the Mine Plan has been revised to address this comment.*

4. Also in Section 1.4 of the Mine Plan (p. MP-2), BHB states that "All of the proposed mining features are located on lands administered by BLM." Please update this statement to reflect that all *currently* proposed mining is to occur on BLM-administered lands, but that BHB's longer term plans (as expressed to BLM) are to also mine the privately-owned surface/Federally-owned mineral lands.

*There are no split-estate lands located within the North Fork POO area or the WDEQ/LQD North Fork Amendment Area. BHB currently has no plans to mine on any other lands within the NFAA/POO area.*

5. It is unclear what "interceptor ditches" are (see Mine Plan Section 2.6, pp. MP-6 through -7). Please include more detail for these features, such as exactly what they are, where they would be used, and why they would be needed.

*Interceptor ditches are ditches which intercept ("to stop, or interrupt the progress or intended course of" - American Heritage Dictionary of the English Language) rainwater or snowmelt before it reaches disturbed areas. Section 2.6 of the Mine Plan has been revised to remove references to "interceptor" in order to eliminate confusion that the BLM may have concerning the word "interceptor".*

6. Several species listed in the permanent seed mix (see Mine Plan, Section 3.1, p. MP-10, and Reclamation Plan, Table RP-1) are undesirable for use on BLM surface lands, as they are not native species. Please remove Crested Wheatgrass and Alkar Tall Wheatgrass, and replace these with Slender Wheatgrass. Or, increase the amounts of the remaining species to yield the same total amount of seed per acre. Please also remove Cicer Milkvetch, and replace with American Vetch, various lupines, and/or Slender Wheatgrass. Or, increase the amounts of the remaining species to yield the same total amount of seed per acre.

*The seed mix has been revised. Crested wheatgrass has been replaced with Slender wheatgrass (Pryor). Tall wheatgrass has been replaced with Indian ricegrass (Nezpar). The seeding rate for both Alkali sacaton and Blue grama has been increased from 0.25 to 0.50 pounds PLS. The seeding rate for Fourwing saltbush has been reduced from 3.0 pounds PLS to 2.0 pounds PLS.*

*Table RP-1 (page RP-14) has been revised to reflect the changes in the seed mix. Due to other changes to the Reclamation Plan required by the BLM, a complete revised copy of the Reclamation Plan is included with this correspondence.*

7. The "temporary" seed mix (see Mine Plan, Section 3.1, p. MP-10) of "an annual sterile small grain such as triticale" is not desirable for use on BLM surface lands. Please use any of the acceptable wheatgrasses from the permanent seed mix.

*According to the March 27, 2012 BLM Wyoming Reclamation Policy Act., Section 7, Part e, the use of small sterile grains are acceptable. This section states "Select non-native plants only as an approved short term and non-persistent (i.e. sterile) alternative to native plant materials. Ensure the non-natives will not hybridize, displace, or offer long-term competition to the endemic plants, and are designed to aid in the re-establishment of native plant communities."*

*If environmental conditions were such that it was possible to establish wheat grasses, then there would be no need for the use of sterile small grain as a temporary seed mix. The use of small grains (sterile and non-sterile) as a soil stabilizer and cover crop, has been a standard accepted practice in mined land reclamation for decades.*

8. There is mention of weed control measures provided in the Reclamation Plan (see Section 5.8, p. RP-6), but not in the Mine Plan. Please also address how this issue will be handled during ground preparations, mining, hauling, etc.

*Section 8.0, Weed Control, has been added to the Mine Plan in order to address this comment.*

9. BHB has explained in some detail (in Mine Plan, Section 3.2, pp. MP-10 through -12, and Appendix 5) how the various analytical results for the overburden determine it's likely suitability as plant growth and root zone materials. These analyses and their

interpretations regarding overburden suitability are apparently standard practice. Therefore, mention needs to be made of the entity(ies) under whose auspices this is considered standard practice, and citation given for the publication(s) that describe these practices, methodologies, and interpretations (for example: "per WDEQ LQD Guideline No. 1, Topsoil and Overburden, in Section II and Appendix I").

*Section 3.2, Paragraph 5 of the Mine Plan has been revised to address this comment. Additionally, the third paragraph (Page D5-3) of the overburden section of Appendix D5, has also been revised to address this comment. Enclosed is a revised copy of Appendix D5 - Topography, Geology and Overburden, Page D5-3.*

10. The statement that "...BHB is restricted from utilizing the access routes leading to the NFAA from April 5<sup>th</sup> until June 15<sup>th</sup>, the period when John Curuchet utilizes this pasture for lambing" (Mine Plan, Section 6.1, p. MP-17) is unclear. Is it meant that no mining, hauling, or other mining-related activities will occur in the entire area during this entire timeframe, or that certain mining-related activities may or will continue with BHB personnel accessing the area via another route?

*Section 6.1, (Page MP-17) has been modified in order to address BLM's confusion concerning access to the area. "Access routes" has been changed to "access route" in order to provide further clarification for the BLM concerning restrictions on access to the NFAA/POO area, even though only one access route is clearly illustrated on the mine plan map.*

**i. BLM original determination:** Describe how, or if, BHB will operate in times of inclement weather. If operation is to occur during times of inclement weather, please explain how unnecessary or undue degradation will be mitigated or avoided.

**BHB original response:** *This is addressed in Mine Plan Section 7.1.*

**BLM second determination:**

It is not clearly stated whether the measures listed in paragraph 2 of Section 7.1 of the Mine Plan (p. MP-19) apply to periods of "temporary closure" (less than 12 months) or "temporary inactivity" (12 months or longer), or both. Please clarify, as paragraph 1 refers to both types of timeframes.

*Section 7.1, Paragraph 2 of the Mine Plan has been modified to address this comment.*

**iii. Support facility and infrastructure plans:**

**a. BLM original determination:** No description is provided for parking or staging areas. Please describe such areas, including where vehicles and equipment are planned to be temporarily parked or housed, where and how fuels and other supplies will be stored prior to use, as well as where and how liquid and solid wastes and trash will be stored prior to removal.

**BHB original response:** *Refer to Mine Plan Section 3.5, and Section 3.6.*

**BLM second determination:**

Describe the plan for the handling of human waste:

1. The Mine Plan needs to address the issue of human waste (see Section 2.8, p. MP-7). Due to the length of time workers will be on-site during mining-related activities, some provision should be made for the handling and removal of human waste from the area.

*It is very clear that the BLM did not require BHB to address human wastes in the BLM's original determination. The BLM should have addressed this issue in the original determination. However, in order to satisfy the BLM's request for additional information on human wastes, BHB has added Section 2.9 to the Mine Plan in order to address BLM's concerns.*

2. A Port-A-Potty facility was observed near the entrance to the mining areas during the on-site visit on October 26, 2011. However, no such facilities are mentioned in the Mine Plan, nor are indicated on Map MP-1.

*The BLM is correct. No such facilities (port-a-potty) were mentioned in the Mine Plan, nor are any indicated on Map MP-1.*

**3) Reclamation Plan:****ii. Regrading and reshaping:**

- a. **BLM original determination:** Should include discussion of soil types and identify any special treatments required for reclamation.

*BHB original response: Appendix D7, Soils, provides soil and map unit descriptions for the soil types found on the Plan area. This information includes recommended topsoil salvage depths. Refer to Mine Plan Section 3.2 and Reclamation Plan Section 4.3 for discussion of overburden analysis and handling.*

**BLM second determination:**

1. BHB indicates that "Overburden stockpiles... [may] remain as a permanent reclamation feature..." (see Reclamation Plan, Section 2.5, p. RP-3). This practice is unacceptable on BLM surface lands.

*Section 2.5 of the Reclamation Plan has been revised to address this comment. Leaving out-of-pit overburden stockpiles as final reclamation features has been an acceptable practice with the Casper, Newcastle and Worland BLM Districts. Why is this un-acceptable to the Buffalo BLM office?*

2. Please ensure seed mixes are adjusted as indicated in items 2) ii) h) 6) and 7).

*The permanent seed mixture has been revised. See Table RP-1.*

3. BHB states that "No mulch such as straw or native hay will be applied..." (Reclamation Plan, Section 5.2, p. RP-4). Please note that certain types of mulch can be used appropriately on BLM surface lands, such as straw, and some tackifiers. Native hay, though, is indeed undesirable for use on BLM surface lands.

*No response required.*

4. BHB indicates that "Lands... which have been classified as bentonite outcrop or shale outcrop... will be reclaimed in such a manner that these lands will exhibit similar pre-mining characteristics... [including] similar surface stability, approximate contours, and an appearance similar to the pre-mining conditions" (see Reclamation Plan, Section 6.1, p. RP-7). What is desired on BLM surface lands is that post-mining reclamation results in conditions that yield a stable environment.

*No response required.*

**c. BLM original determination:** All improvements on BLM surface will be removed and reclaimed for abandonment.

**BHB original response:** Refer to Mine Plan Section 2.1 and Reclamation Plan Section 10.0.

**BLM second determination:**

If any facilities (including for human waste such as Port-A-Potties; see item 2) iii) a)), are to be constructed or utilized on BLM surface, these facilities must be removed and disposed of properly during reclamation.

*Section 2.1 of the Mine Plan clearly states that no facilities will be constructed or utilized on this area. This would include human waste collection receptacles (HWCR). Section 2.9 of the Mine Plan also provides detailed information concerning human wastes. Therefore, there is no need for more discussion concerning HWCR's or human wastes.*

**iii. Mine reclamation:**

**b. BLM original determination:** How water (pits, runoff, accidental spills, waste and deleterious materials, etc.) will be managed during reclamation.

**BHB original response:** Refer to Reclamation Plan Sections 2.3, 2.4 and 9.0.

**BLM second determination:**

Water runoff and methods to avoid or mitigate water-caused erosion are discussed in Sections 2.3, 2.4, and 9.0 of the Reclamation Plan. However, how accidental spills, waste (including human waste), and deleterious materials (including fuel, grease, motor oil, etc.) would be handled during reclamation were not discussed. Please address these issues in the Reclamation Plan.

*Section 9.1, "Spill Containment and Counter Measures", has been added to the Reclamation Plan. This section address accidental spills of fuels or lubricating oils.*

*Section 9.2 - "Human Waste Management During the Reclamation Phase", has been added to the Reclamation Plan in order to address the BLM's continued interest in the management of human wastes.*

- c. **BLM original determination:** Post-closure management needs to be addressed, including types of monitoring that will occur (such as on-the-ground, or analyzing nearby well water) and length of time for each, and how to mitigate or reclaim if any untoward event occurs.

**BHB original response:** Refer to Section 1.8 of the Mine Plan and Section 12.0 of the Reclamation Plan.

**BLM second determination:**

BHB states that "...final bond release is approved by [WDEQ] LQD" (see Reclamation Plan, Section 12.0, p. RP-10). This is inaccurate. For lands administered by BLM, such as BLM surface lands, final bond release is approved by *both* the WDEQ LQD and BLM. Please update this information.

*Section 12, Paragraph 1 of the Reclamation Plan has been revised to include a reference to the BLM.*

v. **Wildlife habitat rehabilitation:**

- b. **BLM original determination:** The seed mixture, described on pages RP-3 and RP-4, does not include any forb species or sagebrush. The Mine Plan states that the goal of reclamation will be to re-establish wildlife habitat to a condition equal or greater than pre-mining conditions. Please amend your reclamation plan to address sage-grouse habitat, specifically by adding forb species into the seed mix, and addressing sagebrush re-establishment.

**BHB original response:** Refer to Section 5.0 and Reclamation Table RP-1.

**BLM second determination:**

Please ensure seed mixes are adjusted as indicated in items 2) ii) h) 6) and 7).

*The seed mix has been revised. See Table RP-1 of the Reclamation Plan.*

vii. **Revegetation:**

- a. **BLM original determination:** The reclamation seed mix quoted in the reclamation plan is acceptable for Range Management for BLM surface lands, for the relatively small areas proposed to be disturbed in this Mine Plan. However, as indicated in item 3) v) b), above, forb species need to be included in the seed mix, and sagebrush reestablishment needs to be addressed.

**BHB original response:** See Reclamation Plan Table RP-1.

**BLM second determination:**

Please ensure seed mixes are adjusted as indicated in items 2) ii) h) 6) and 7).

*The seed mix has been revised. See Table RP-1 of the Reclamation Plan.*

4) **Monitoring Plan:**

iii. **Wildlife protection and monitoring.**

**BLM original determination:** The Mine Plan makes mention of wildlife protection and monitoring on pages MP-11 and MP-12. However, no monitoring strategy or plan was submitted with the Mine Plan. Please submit a monitoring plan for determining

what wildlife is present in the affected area of the proposed project, and how mining will affect the wildlife resources in the area. In addition, please submit official letters from the Wyoming Game and Fish Department (WGFD) and the U.S. Fish and Wildlife Service (USFWS) with their comments regarding the project and recommendations for mitigation of the projects' effects.

**BHB original response:** Responses pending. [Responses received on March 18 and April 4, 2012.]

**BLM second determination:**

BLM received copies of the WGFD and USFWS comment letters on April 4, 2012. Both included recommendations for mitigation that would reduce impacts to wildlife from mining activities. See the 2 comments below for how to address.

**Other Information:**

In addition to the components identified above which are necessary for a complete Mine Plan, additional operational and baseline environmental information will facilitate BLM's National Environmental Policy Act (NEPA) analysis of the proposed operations and activities. Please note that in addition to the information listed below, there may be other information needed as the NEPA analysis process is completed.

**Wildlife:**

- 3) **BLM original comments:** In the wildlife report on pages D9-12 and D9-13, under "D9.5.0 Conclusions," BHB states that MBHFI will be protected wherever they are found. Please be more specific as to how BHB plans to detect nests of migratory birds and mitigate impacts to them.

**BHB original response:** Responses pending. [Responses received on March 18 and April 4, 2012.]

**BLM second comments:**

BHB did not adequately address the original comment in their March 18, 2012, response. Please include mitigation for migratory birds in the Mine POO, based on the recommendations of USFWS.

The USFWS letter providing comments for the proposed amendment includes recommendations to mitigate impacts to migratory birds in accordance with the Migratory Bird Treaty Act:

*"We recommend the project be undertaken outside of the migratory bird nesting season (February 1 – August 31). If this is not possible, removal of vegetation should take place outside the nesting season to prevent take of migratory birds, nests, and chicks. We also recommend that migratory bird surveys should be conducted on the mine permit area including a buffer of 0.5 mile (1 mile for ferruginous hawks) of the permit area prior to land clearing or mining. It is notated in the mine plan that access to the permit area is restricted from April 5 until June 15, per an agreement with the private land owners."*

*Appendix D9-Wildlife, has been revised to include an additional section, Section D9.6.0, Mitigation Measures to Reduce Impacts to Wildlife. This section addresses BLM's comments concerning greater sage-grouse mitigation measures as well as mitigation measures concerning migratory birds and threatened and endangered species. A revised copy of Appendix D9 (pages D9-i thru D9-iv; D9-1 thru D9-22) is provided for replacement in the BLM's copy of the NFAA Plan of Operation.*

- 4) **BLM original comments:** No mention is made as to how BHB plans to mitigate impacts to sage-grouse from mining in close proximity to Core Area leks and suitable nesting habitat. Please provide either justification as to why no mitigation is needed, or provide measures to mitigate impacts to sage-grouse.

**BHB original response:** Responses pending. [Responses received on March 18 and April 4, 2012.]

**BLM second comments:**

BHB did not adequately address the original comment in their March 18, 2012, response. Please include mitigation for sage-grouse in the Mine POO, based on the recommendations of WGFD.

The WGFD letter providing comments for the proposed amendment includes recommendations to mitigate impacts to sage-grouse:

*"... we recommend a March 1<sup>st</sup> to May 15<sup>th</sup> seasonal timing stipulation for noise levels at the core lek perimeters that should not exceed 10dBA above ambient noise from 6:00 p.m. to 8:00 a.m."*

*Appendix D9-Wildlife, has been revised to include an additional section, Section D9.6.0, Mitigation Measures to Reduce Impacts to Wildlife. This section addresses BLM's comments concerning greater sage-grouse mitigation measures as well as mitigation measures concerning migratory birds and threatened and endangered species. A revised copy of Appendix D9 (pages D9-i thru D9-iv; D9-1 thru D9-22) is provided for replacement in the BLM's copy of the NFAA Plan of Operation.*

**Reclamation Bond Calculation:**

BLM may require other information, such as a reclamation cost estimate, to ensure that proposed operations comply with BLM regulations 43 CFR 3809. An initial reclamation cost estimate has been provided in the Mine Plan. WDEQ LQD establishes the bond amount on public lands (per 43 CFR 3809.500 and WS 35-11-417, and as stated in Supplement to MOU No. 19 Between the US DOI and the WDEQ LQD for Management of Surface Mining and Exploration for Locatable Minerals on Public Lands, signed 11/19/2003). In addition, bond coverage is re-evaluated with each annual report. BLM shall review the bond amount and respond to LQD with either concurrence or recommendations for modification. BLM has not reviewed the reclamation cost estimate or bond, as bond information has not been provided by the WDEQ LQD. After receiving the required bond information, BLM will review the bond and the reclamation cost estimate, and provide concurrence or recommendation for modification to LQD within 15 business days.

**BLM second comments:**

BLM has conducted a review of the initial reclamation cost estimate provided in the Reclamation Plan (pp. RP-11 through -12). This cost estimate is lacking a number of pieces of information, and the source of information for other data. Some data needs to be updated with more recent figures. BLM was therefore unable to confirm the appropriateness of the initial reclamation cost provided of \$437.00/acre (p. RP-12). Please provide the missing information, update figures, recalculate the initial reclamation cost, and resubmit these data, calculations, and calculated cost.

1. Figures that need to be updated to match the updated WDEQ LQD Guideline No. 12 (updated November, 2011) include:
  - a. "Cost of Overburden & Topsoil Replacement Using Caterpillar 637G Push-Pull Scrapers"

- (p. RP-11) of \$0.913 per BCY should now be \$1.067 per BCY.
- b. "Cost of Final Grading a Caterpillar 16M Grader" of \$68.61 per acre (p. RP-11) should now be \$73.79 per BCY.
  - c. The "Operating Efficiency Factor" used in two separate calculations under "Production Rates & Operating Costs for Tillage & Seeding (pp. RP-11 and RP-12) – John Deere 7810 Tractor" ("... Disking Topsoil..." and "... Seeding Topsoil...") of 90% should now be 83%.
  - d. "Grading Topsoil" near the end of the calculations (p. RP-12) of \$68.61 per acre should now be \$73.79 per BCY.

*Table MP-3 has been modified. The current WDEQ/LQD Guideline 12 reclamation costs have been incorporated and included in the revised calculations.*

2. It is not indicated where many of the figures under "Production Rates & Operating Costs for Tillage & Seeding – John Deere 7810 Tractor" come from, or how they were derived. Please supply this information for these figures, which include:
  - a. Under "Hourly Operating Costs...":
    - i. "Tractor Owning & Operating Cost" of \$25.00/hr
    - ii. "Drill Owning & Operating Cost" of \$8.00/hr
    - iii. "Operator" cost of \$15.00/hr
    - iv. "Supervision" cost of \$2.50/hr
    - v. "Supervisor Transportation" cost of \$0.47/hr
  - b. Under "... Disking Topsoil...":
    - i. "Speed... 2<sup>nd</sup> Gear" of 2.5 MPH
    - ii. "Width of Disc per Pass" of 12 feet
  - c. Under "... Seeding Topsoil...":
    - i. "Speed... 3<sup>rd</sup> Gear" of 4.3 MPH
    - ii. "Width of Drill per Pass" of 10 feet

*Operating costs for tillage and seeding are the actual costs incurred by BHB.*

3. Missing is a cost for post-seeding maintenance. 10% is recommended for estimating this cost (see WDEQ LQD Guideline No. 12, p. 7).

*A contingency factor for post-seeding maintenance is not missing as the WDEQ/LQD has never required BHB to provide for post-seeding maintenance in the contingency factors. BHB provides an additional bonding liability of \$200.00 per acre (seeding reserve) for all lands within Permit to Mine No. 339C that have been seeded, but not granted full bond release. This seeding reserve item is enumerated in each annual report submitted to WDEQ/LQD and BLM.*

4. BHB has indicated contingency costs of 25% on top of the initial reclamation cost associated with the first year of mining for this Mine POO (p. RP-12). However, guidelines indicate contingency costs higher than this can be warranted (WDEQ LDQ's November 2011 version of Guideline No. 12 lists 25-45%, and BLM's 2006 Interoffice Memorandum WO-2006-135 lists 30-45%). Please provide a brief explanation why BHB believes that total contingency costs for reclamation on the low end are properly warranted for this Mine POO.

*Over the past twenty seven years, the WDEQ/LQD and the Buffalo, Worland, Newcastle*

*and Casper BLM field offices have consistently accepted contingency factors between 20-25% for BHB's reclamation bond calculations and estimates. Contrary to the belief by the BLM-BFO that contingency factors of 25% are "low-end", nearly all of the bentonite mining operations within the state have similar contingency factors.*

*BHB's ability to historically utilize total contingency factors in the range of 25% is due to the extremely high degree of confidence that the WDEQ/LQD has in BHB's operations and the detail of information that BHB provides in estimating the reclamation costs associated with each of BHB's permitted mining operations. BHB has earned a very high degree of confidence with the WDEQ/LQD in our day to day mining and reclamation activities, as well as in the details that BHB provides in its annual mining reports and reclamation bonding calculations.*

For further information or clarification please contact Kerry Aggen, Geologist and Project Manager (telephone: 307-684-1196, email [kaggen@blm.gov](mailto:kaggen@blm.gov)).

Sincerely,

Duane W. Spencer  
Field Manager