

CLEAN WATER ACT 404/401 ALTERNATIVES ANALYSIS

INTRODUCTION

This document provides a 404 Alternatives Analysis for proposed surface and auger mining activities on behalf of Oxford Mining Company, LLC, for the proposed Pasco Mining Area in Jefferson County, Ohio. Alternatives considered biological and physical impacts, technical feasibility, cost effectiveness, water quality conservation projects, water pollution control costs, human health impacts, social and economic benefits and losses, environmental benefits and losses, and are described herein.

PROJECT OVERVIEW

Oxford Mining Company, LLC is planning to impact the area by surface mining and highwall miner operations in order to recover the No. 8A and No. 8 coal seams to meet market demands. Oxford Mining Company, LLC is proposing the preferred alternative to conduct surface and auger mining activities on a 260.2-acre site to meet contractual obligations to deliver coal. The applicant has estimated that the proposed project would result in the recovery of approximately 322,560 tons of coal.

Mining of the proposed permit area is developing the Pomeroy No. 8A Coal seam and the Pittsburgh No. 8 Coal seam by contour mining using the box cut method, and auger mining using a conventional auger. Dozers, scrapers, loaders and trucks will be used to mine and reclaim this area. The No. 8A and No.8 coal is found, ranging in elevation between 980 and 1080 feet M.S.L., as represented by the submitted test holes. Fill is required for the construction of the staging area, equipment crossing, coal loading, coal extraction, haul road construction, hauling and reclamation. These constructive uses are required for the intended purpose of obtaining and maximizing coal resources.

The site lies within Sections 21 and 27 of Wells Township, in Jefferson County, Ohio. See the Project Location Map included with the Compensatory Mitigation Plan.

PREFERRED ALTERNATIVE PROJECT IMPACTS

The preferred alternative would cause primary impacts to nine jurisdictional streams totaling 3,490 linear feet of stream and 0.04 acres of jurisdictional wetland. These waters are located within the Rush Run watershed and associated with the Ohio River. The process of removing the coal, construction of sediment ponds, and the transport of mine runoff will result in jurisdictional stream impacts. General characteristics of these resources can be found in the General Descriptions of the Aquatic Environment Directly Affected. A comprehensive compensatory mitigation plan has been developed only for the preferred alternative. After careful consideration, the applicant has determined that due to the impact to the 40% reduction in coal recovery, the minimal degradation alternative would be too costly to pursue. The tables below list the resources both impacted and avoided by the preferred alternative.

<i>Table 1 - Impacted Stream Descriptions</i>						
Stream ID	HHEI Score	Flow Regime	Juris-dictional?	Length Within Permit	Length of Impact	Type Of Impact
Intermittent Stream Impacts						
3	26	Intermittent	Yes	327	293	Mine Through, Temporary Diversion
4	19	Intermittent	Yes	479	479	Mine Through, Haul Road, Reclamation
5	14	Intermittent	Yes	225	225	Mine Through
6	49	Intermittent	Yes	436	322	Mine Through, Sediment Transport,
7	25	Intermittent	Yes	190	45	Mine Through, Sediment Transport
16	25	Intermittent	Yes	2,898	1,696	Mine Through, Reclamation
17	65	Intermittent	Yes	207	110	Temporary Stream Diversion, Reclamation
18	18	Intermittent	Yes	307	162	Reclamation, Temporary Stream Diversion
Ephemeral Stream Impacts						
5	14	Ephemeral	Yes	158	158	Mine Through
*Total Impacts to Jurisdictional Streams					3,490	
*Secondary Impacts to Jurisdictional Streams						
*Primary Impacts to Jurisdictional Streams						

<i>Table 2 - Wetlands within delineation area impacted by project.</i>				
Wetland Name	Impacted Acreage	Total Acreage	ORAM Score	Impact Type
Wetland A	0.04	0.04	45	Mine Through
Total Impact	0.04			

PREFERRED ALTERNATIVE PROJECT AVOIDANCE

Upon reviewing the locations of streams and wetlands within the project area in relation to the location of coal reserves, the applicant has taken great care to revise the permit area. As a result, approximately 20,546 linear feet of streams and 3.12 acres of wetland will be avoided under the preferred alternative. Table 2 and 3 lists the wetlands and streams identified in the Preliminary Jurisdictional Determination Report that will be avoided under the minimal degradation alternative.

Table 1 - Wetlands within delineation area avoided by project.

Wetland Name	Acreage	Wetland Type	ORAM Score	Impact Type
Wetland B	0.31	PEM	34	None
Wetland C	0.06	PEM	19	None
Wetland D	0.54	PEM	21	None
Wetland E	0.13	PEM	46	None
Wetland F	1.5	PEM	66	None
Wetland G	0.53	PEM	55	None
Wetland H	0.05	PEM	53	None
Total Avoidance	3.12			

Table 2 –Stream within Delineation area avoided by project.

<i>Ephemeral Streams</i>			
Stream ID	Flow Regime	Length Avoided	HHEI Score
STREAM 11	EPHEMERAL	196	13
<i>Intermittent Streams</i>			
Stream ID	Flow Regime	Length Avoided	HHEI Score
STREAM 1	INTERMITTENT	1,381	47
STREAM 2	INTERMITTENT	174	19
STREAM 3	INTERMITTENT	190	26
STREAM 4	INTERMITTENT	43	19
STREAM 5	INTERMITTENT	241	14
STREAM 6	INTERMITTENT	380	49
STREAM 7	INTERMITTENT	320	25
STREAM 8	INTERMITTENT	2,492	39
STREAM 9	INTERMITTENT	16	25
STREAM 12	INTERMITTENT	644	18
STREAM 14	INTERMITTENT	1,575	35
STREAM 15	INTERMITTENT	1,072	26
STREAM 16	INTERMITTENT	1,252	26
STREAM 17	INTERMITTENT	255	35
STREAM 18	INTERMITTENT	200	36
<i>Perennial Streams</i>			
Stream ID	Flow Regime	Length Delineated	HHEI Score
STREAM 10	PERENNIAL	787	65
STREAM 12	PERENNIAL	1,732	49
STREAM 13	PERENNIAL	7,596	50
Total Length of Delineated Streams Avoided		20,546	

PROJECT BENEFITS

Social and economic benefits from the preferred alternative are significant. The continued successful operation of Oxford Mining Company, LLC will allow them to maintain approximately 100 jobs. In October 2008, the market value for coal was set at \$ 30-34/ton. Under the preferred alternative, mining will produce approximately 322,560 tons of coal. The “coal value” of the proposed alternative is therefore approximately \$9,676,800 to \$10,967,040. It is also important to realize that the vast majority of this coal value will be directly invested in the local and state economies for salaries, fuel, equipment, equipment maintenance, shipping, and materials, including seed and vegetation purchased for reclamation of the site. This coal value will secondarily be invested in local restaurants, gas stations, mechanic shops, hardware stores, grocery stores, car dealerships and housing. Oxford Mining Company, LLC is clearly a vital industrial component to the region as well as the State of Ohio. Lost energy production may also seem inconsequential, but consider the impact of a 3-day power outage in a major metropolitan area. Every day of energy production is vital to our State.

The Ohio Coal Industry currently pays a combined total of \$1.15 of State and Federal tax per ton of coal. The expected total production of coal will generate approximately \$370,944 of tax revenue for this project.

The proposed project would enable future coal recovery, which is utilized on a local, regional, and national basis to produce electricity. The proposed project would meet the needs and welfare of the people relative to the establishment of approximately 100 jobs and through the continued delivery of coal. The proposed mining activity will not have a disproportionate impact on low-income or minority populations. Jefferson County had an unemployment rate of 10.2% in May of 2011. The State average unemployment rate at that time was 8.5%. The jobs provided by the proposed project will offer higher than average salaries and better benefits than most in the region.

DESCRIPTION OF ALTERNATIVES

No alternate sites were considered in the following analysis because the selected site provides economical recovery of coal, an opportunity to reclaim abandoned mine lands, and because there is no reason to believe that an alternate site would result in decreased impacts to water quality. The proposed site also has the benefit of being located in an area of Jefferson County with a relatively low population density.

Oxford Mining Company, LLC. has used best management practices in an effort to minimize impacts onsite. They have revised the original permit limits to avoid and eliminate impacts to approximately 20,546 linear feet of stream within or near the final permit area. Under the preferred alternative, the final permit limits include primary impacts to approximately 3,490 linear feet of jurisdictional stream and 0.04 jurisdictional wetland. These impacts reflect the least environmentally damaging area needed to mine this site efficiently without compromising the general purpose and need associated with this project. Therefore, further minimization of water resources that are proposed to be impacted onsite is not economically feasible for this project. The minimal and avoidance alternatives were developed and are illustrated in the attached exhibits.

PREFERRED ALTERNATIVE

The preferred alternative is to extract the Pomeroy No. 8A and Pittsburg No. 8 coal seams from approximately 260.2 acres (see Preferred Alternative Map). Conventional surface and auger mining methods would be used to extract coal, which requires removal of covering soil and rock (overburden), extraction of coal, and replacement of rock and spoil approximately to original contours. This alternative considered impacts to cultural and natural resources and includes only those areas for which there is substantial economic justification. The process of removing the coal, construction of the sediment ponds, and the transport of mine runoff will result in the primary impact of approximately 3,490 linear feet of jurisdictional streams and 0.04 acres of jurisdictional wetlands.

Description of Construction or Placement of Fill

The preferred alternative would impact nine jurisdictional streams totaling 3,490 linear feet and 0.04 acres of jurisdictional wetland. These waters are located within the Rush Run watershed and associated with the Ohio River. In addition, the process of removing the coal, construction of sediment ponds, and the transport of mine runoff will result in jurisdictional stream impacts. General characteristics of these resources can be found in the Preliminary Jurisdictional Determination Report.

A total of nine temporary sediment ponds would be required in order to trap sediment resulting from construction and refuse disposal activities. Dams for sediment ponds will be covered with topsoil, mulched, and seeded. The ponds are meant to reduce the transport of sediment and other substances while maintaining water quality standards in the watershed. The proposed project is expected to improve the water quality within the watershed. Diversion ditches will also be constructed and maintained to assure that all runoff from the permit area is directed to the sediment ponds as designed.

For detailed information concerning the sediment ponds proposed for the project please refer to the Application and Hydrology Map as well as Engineering Design Sheets in the ODNR Permit Application. The cost of bonding for the entire project site are estimated at \$650,000.

Description of Magnitude of Lowering Water Quality

Proposed impacts to jurisdictional waters will be permanent. However, the lowering of water quality will not be permanent as water quality and ecological function is restored during construction of mitigation streams and wetlands and the remaining portion of the site is reclaimed. The physical and biological functions of the wetlands and streams to be impacted are described in the Preliminary Jurisdictional Determination Report. A comprehensive compensatory mitigation plan has been developed for this alternative and is included with this application package.

There are no records of endangered or threatened species in the vicinity of the project area. Therefore, none of the alternatives is likely to adversely affect endangered or threatened species. No high quality streams or wetlands are proposed for impact therefore, no impact to commercial or recreational fishing is expected to result from this project under any alternative.

The proposed preferred alternative, if permitted, will reclaim the entire affected area (260.2 acres) according to ODNR and SMCRA regulations. The project will result in no lasting degradation of water quality.

Discussion of Technical Feasibility

As stated earlier, the preferred alternative considered impacts to waters of the United States, as well as other concerns and constraints. This alternative addressed the cost-effectiveness and technical feasibility of extracting the No. 8A and No. 8 coal seams and was oriented toward extraction from those areas that could be efficiently obtained. In areas where overburden is too great, the cost-effectiveness of coal extraction decreases and the coal is left behind. One consideration is determining cost-effectiveness is the cost of moving equipment around objects (such as streams) versus the cost of mitigating impacts to jurisdictional waters. While some small areas may not contain adequate coal reserves, it is sometimes more cost-effective to continue mining through the area to the next reserve. As proposed, the preferred alternative is the most technically feasible and cost-effective method of coal extraction for the project area.

Description of Important Social and Economic Benefits Realized through this Project

Social and economic benefits from the preferred alternative are significant. The continued successful operation of Oxford Mining Company, LLC will allow them to maintain approximately 100 jobs. In October 2008, the market value for coal was set at \$ 30-34/ton. Under the preferred alternative, mining will produce approximately 322,560 tons of coal. The “coal value” of the proposed alternative is therefore approximately \$9,676,800 to \$10,967,040. It is also important to realize that the vast majority of this coal value will be directly invested in the local and state economies for salaries, fuel, equipment, equipment maintenance, shipping, and materials, including seed and vegetation purchased for reclamation of the site. This coal value will secondarily be invested in local restaurants, gas stations, mechanic shops, hardware stores, grocery stores, car dealerships and housing. Oxford Mining Company, LLC is clearly a vital industrial component to the region as well as the State of Ohio. Lost energy production may also seem inconsequential, but consider the impact of a 3-day power outage in a major metropolitan area. Every day of energy production is vital to our State.

The Ohio Coal Industry currently pays a combined total of \$1.15 of State and Federal tax per ton of coal. The expected total production of coal will generate approximately \$370,944 of tax revenue for this project. The proposed lowering of water quality is necessary to accommodate important economic development and to meet a demonstrated public need as defined in rule 3745-1-50 of the Ohio Administrative Code:

3745-1-50(11)

“Public Need” means an activity or project that provides important tangible and intangible gains to society that satisfy the expressed or observed needs of the public where accrued benefits significantly outweigh reasonable foreseeable detriments.

The people of Ohio require coal for the production of electric power. The coal provided by this project would meet the public need. Nine thousand (9,000) tons of coal/day will generate 1,000 megawatts of electricity. A 1,000-megawatt generator, operating at 60% capacity (i.e., at 600 megawatts) will generate enough electricity in a day to serve 1 million people. Under this alternative, the 322,560 tons of coal would be enough to generate over 358,042 megawatts, which is enough electricity for 1 million people for approximately 59 days.

Environmental Benefits

The preferred alternative, if permitted, would allow the affectment of 260.2 acres of surface area for the purpose of mining coal. The proposed preferred alternative, if permitted, will reclaim 47 acres of pre-law surface mining impacts. The project will result in no lasting degradation of water quality.

Justification of Selection of the Preferred Alternative

Social and economic benefits from the preferred alternative are significant. The continued successful operation of Oxford Mining Company, LLC. will allow them to maintain 100 jobs in the region. It is also important to realize that the vast majority of the coal value (up to \$10,967,040) will be directly invested in the local and state economies for salaries, fuel, equipment, equipment maintenance, shipping, and materials, including seed and vegetation purchased for reclamation of the site. Despite this, the applicant has determined that the minimal and non-degradation alternatives would be too costly to pursue considering the decreased coal recovery and that the preferred alternative should be pursued.

AVOIDANCE ALTERNATIVE

The avoidance alternative requires that no damage (i.e., no excavation or fill) occurs to reduce surface water quality. This alternative was very carefully examined to determine if any mining could occur on the proposed site without impacting water quality. A plan under this alternative would extract only the coal reserves located outside of stream buffer zones and other waters of the state.

On the proposed site, numerous streams are located in the areas previously mined. Many of these areas would benefit from post-mining reclamation, however, the avoidance alternative would not allow for these resources to be impacted. Therefore, these areas could not be mined under this alternative. Under the non-degradation alternative, approximately 83 acres could be mined. Still, the necessity to avoid all aquatic resources limits the placement of drainage ditches and sediment ponds. As a result, avoiding these resources would reduce the amount of coal recovered to 32% (103,000 tons) of that available onsite.

It has been determined that avoiding all of the wetlands and streams on the site would result in the applicant not being to gain access to the coal reserves to make the project economically feasible. Therefore, an avoidance alternative should be considered a no-action alternative.

Description of Construction or Placement of Fill

Under the avoidance alternative, no fill would be placed in waters on the site. Water resources would be protected from runoff by diversion ditches that direct runoff to constructed sediment ponds. To maintain a negative drainage gradient, the sediment ponds would be constructed near existing streams. It is important to keep in mind that the costs associated with mining will likely make this alternative not feasible.

Description of Magnitude of Lowering Water Quality

Under the non-degradation alternative, there would be no lowering of water quality. All runoff from the mining activity would be directed via diversion ditches to constructed sediment ponds in order to protect the aquatic resources onsite.

Discussion of Technical Feasibility

The avoidance alternative is not technically feasible because of the reduction of coal recovery. Under the non-degradation alternative the coal recovery would be reduced by approximately 68% (from 322,560 to 103,000 tons). However, the operation would still require the construction of a haul road and three sediment ponds compared to only four ponds under the minimal degradation alternative. The amount of earth work required to meet the permit requirement combined with the substantial reduction in coal recovery make the non-degradation alternative not technically feasible.

Description of Important Social and Economic Benefits Realized through this Project

The social and economic benefits lost from the avoidance alternative are significant. The avoidance alternative would result in the project not being technically or economically feasible and thus not being pursued. Without successful operation of the site, it is likely that dozens of jobs provided by Oxford Mining Company, LLC could be jeopardized.

The alternative would have no benefit to tourism or recreational activities. Under the avoidance alternative, 219,560 tons of coal would be lost as compared to the preferred alternative (68% reduction). The coal value under this alternative is approximately \$3,090,000 to \$3,502,000. The non-degradation alternative would result in \$23,690 tax dollars annually and \$118,450 of tax dollars in total.

Environmental Benefits:

Under the avoidance alternative, the 47 acres of impacts from pre-law strip mining would not be reclaimed and no major environmental benefits would occur.

MINIMIZATION ALTERNATIVE

Impacts proposed with the project are necessary in order to recover the coal reserve in a cost effective and technically feasible manner. Efforts to minimize impacts to water resources on the site often reach a point of diminishing return for the applicant. In most scenarios this means that as the number of impacts increase, the amount of coal recovered increases dramatically.

Upon receiving the jurisdictional determination from the ACOE, the applicant made great efforts to minimize impacts to wetlands and streams on site. The resulting minimal degradation alternative would cause primary impacts four jurisdictional streams totaling 2,013 linear feet of streams. These waters are located within the Rush Run watershed and associated with the Ohio River. The process of removing the coal, construction of sediment ponds, and the transport of mine runoff will result in jurisdictional stream impacts. Descriptions of these resources can be found in the General Descriptions of the Aquatic Environment Directly Affected and the Preliminary Jurisdictional Determination Report. A compensatory mitigation plan has not been developed for this alternative. Materials discharged to jurisdictional waters overlie the coal, and include shale and sandstone. Those materials are further described in Part 2, Drilling Reports – Surface located in the ODNR Mining Permit Application. Following redistribution of overburden, stockpiled topsoil will be redistributed over the entire site.

Under the minimal degradation alternative, six temporary sediment ponds will trap sediment resulting from construction and refuse disposal activities. Diversion ditches will also be constructed and maintained to assure that all runoff from the permit area is directed to the sediment ponds as designed. The ponds are meant to reduce the transport of sediment and other substances while maintaining water quality standards in the watershed. Dams for sediment ponds will be covered with topsoil, mulched, and seeded. Pond

outlets have been designed to minimize the velocity of water exiting the pond using a low gradient straight pipe and rock lined spillways. This best management practice is intended to protect downstream designated life uses as listed by the Ohio EPA. The proposed project is expected to improve the water quality within the watershed.

For detailed information concerning the sediment ponds proposed for the project please refer to the Application and Hydrology Map and Engineering Design Sheets included with this application. Reclamation costs for the minimal degradation alternative are estimated at \$394,000.

Description of Magnitude of Lowering Water Quality

Proposed impacts to jurisdictional waters will be permanent. However, the lowering of water quality will not be permanent as water quality and ecological function is restored during construction of mitigation streams and wetlands and the remaining portion of the site is reclaimed. The physical and biological features of the wetlands and streams to be impacted are described in the General Descriptions of the Aquatic Environment Directly Affected and Stream and Wetland Functional Assessment.

There are no records of endangered or threatened species in the vicinity of the project area. Therefore, none of the alternatives is likely to adversely affect endangered or threatened species. No high quality streams or wetlands are proposed for impact therefore, no impact to commercial or recreational fishing is expected to result from this project under any alternative.

The proposed impact, if permitted, will reclaim the entire site (157.6) according to ODNR and SMCRA regulations. The project will have no prolonged or permanent lowering of water quality.

Discussion of Technical Feasibility

The minimal degradation alternative considered impacts to waters of the United States, as well as other concerns and constraints. Impacts to wetlands and streams were minimized to only those places required for responsible coal removal. This alternative addressed the cost-effectiveness and technical feasibility of extracting the No. 8A and No. 8 coal seams and was oriented toward extraction from those areas that could be efficiently obtained. In areas where overburden is too great, the cost-effectiveness of coal extraction decreases and the coal is left behind. One consideration is determining cost-effectiveness is the cost of moving equipment around objects (such as streams). Compared to the preferred alternative, the minimal degradation alternative would recover approximately 40% more coal while requiring only three less sediment ponds. As proposed in the ODNR Mining Permit Application, the minimal degradation alternative is not the most technically feasible and cost-effective method of coal extraction for the project area.

Description of Important Social and Economic Benefits Realized through this Project

Social and economic benefits from the minimal degradation alternative are significant. The continued successful operation of Oxford Mining Company, LLC will allow them to maintain approximately 100 jobs. The current market value for coal is \$30-34/ton depending on the quality and cleanliness. Under the minimal degradation alternative, mining will produce approximately 195,100 tons of coal. The “coal value” of the proposed alternative is therefore approximately \$5,853,000 – 6,633,400. It is also important to realize that the vast majority of this coal value will be directly invested in the local and state economies for salaries, fuel, equipment, equipment maintenance, shipping, and materials, including seed and vegetation purchased for reclamation of the site. This coal value will secondarily be invested in local restaurants, gas stations, mechanic shops, hardware stores, grocery stores, car dealerships and housing. Oxford Mining Company, LLC is clearly a vital industrial component to the region as well as the State of

Ohio. Lost energy production may also seem inconsequential, but consider the impact of a 3-day power outage in a major metropolitan area. Every day of energy production is vital to our State.

The Ohio Coal Industry currently pays a combined total of \$1.15 of State and Federal tax per ton of coal. The expected total production of coal will generate approximately \$224,300 of tax revenue for this project. The proposed lowering of water quality is necessary to accommodate important economic development and to meet a demonstrated public need as defined in rule 3745-1-50 of the Ohio Administrative Code:

3745-1-50(11)

“Public Need” means an activity or project that provides important tangible and intangible gains to society that satisfy the expressed or observed needs of the public where accrued benefits significantly outweigh reasonable foreseeable detriments.

The people of Ohio require coal for the production of electric power. The coal provided by this project would meet the public need. Nine thousand (9,000) tons of coal/day will generate 1,000 megawatts of electricity. A 1,000-megawatt generator, operating at 60% capacity (i.e., at 600 megawatts) will generate enough electricity in a day to serve 1 million people. Under this alternative, the 195,100 tons of coal would be enough to generate over 214,610 megawatts, which is enough electricity for 1 million people for approximately 35 days.

Environmental Benefits

The minimal degradation alternative, if permitted, would allow the impact of up to 157.6 acres for the purpose of mining coal. As required under the CAP permit, reclamation of the entire site to comply with ODNR and SMCRA regulation. In addition, no effect on endangered or threatened species is expected.

SUMMARY

Oxford Mining Company, LLC., while obligated to deliver coal resources that provide necessary energy for local communities, is dedicated to the preservation and enhancement of natural resources and water quality within the watershed. Mining reclamation activities, including wetland mitigation, are geared towards protecting surface waters outside the permit area and their associated functions and habitats within the permit area. By adhering to Ohio's Wetland Water Quality Standards, reclaiming habitat previously impacted by surface mining; and replicating existing conditions of the impacted wetland, Oxford Mining Company, LLC. will enhance surface water function at the Pasco Mine site. Oxford Mining Company, LLC. will also be responsible for success of the mitigation areas during the monitoring period. Long-term maintenance of the site will be the responsibility of the property owner. The reconstructed wetland area at minimum will be under the same protection afforded to those watercourses prior to the mining and reclamation of the permit area. Any future impacts to jurisdictional waters will require a permit from the U.S. Army Corps of Engineers, Pittsburgh, PA District.

A summary comparison of the costs and benefits of each alternative is presented in Table 4.

<i>Table 4- Comparison of Alternatives</i>			
Metric	Preferred Alternative	Minimization Alternative	Avoidance Alternative
Coal Tonnage	322,560	195,100	103,000
Coal Value	\$9,676,800 to \$10,967,040	\$5,853,000 – 6,633,400	\$3,090,000 to \$3,502,000
Megawatts of Electricity Produced	358,042	214,610	113,300
# of Days of Power for 1 million People	59	35	19
Total Tax Revenue	\$370,944	\$224,300	\$118,450
# of Acres	260.4	157.6	83
County Unemployment Rate	6.4% (September 2008)		
County Poverty Rate	10.1% (2004)		
Environmental Benefits	Reclamation of 47 acres of impacts from pre-law mining. Including 3,600 feet of highwall and 0.50 acres of pit impoundments.	Reclamation of 47 acres of impacts from pre-law mining. Including 3,600 feet of highwall and 0.50 acres of pit impoundments.	No environmental benefits would be realized.
Social Benefits	Generation of \$370,944 of total tax revenue, support of 100 jobs, electricity production for 1 million people for 59 days.	Generation of \$224,300 of total tax revenue, support of 100 jobs, electricity production for 1 million people for 35 days..	Generation of \$118,450 of total tax revenue, support of 100 jobs, electricity production for 1 million people for 19 days.