USACE NEPA REQUIREMENTS

APPLICANT: Oxford Mining Company, LLC

PROJECT: Pasco Mining Area

APPLICANT ADDRESS: Oxford Mining Company, LLC
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INTRODUCTION:

The project is referred to as the Pasco Mining Area.

DESCRIPTION OF THE PROJECT:

Construction of the proposed minimal degradation alternative would result in the discharge of approximately 2,675 cubic yards of fill material into jurisdictional waters. As a result, the project will impact approximately 3,490 linear feet of jurisdictional streams and 0.04 acres of jurisdictional wetland. Materials discharged to jurisdictional waters overlie the coal, and include shale and sandstone. The applicant has estimated that the proposed project would result in the recovery of approximately 322,560 tons of coal.

LOCATION OF THE PROPOSED PROJECT:

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.

PURPOSE AND NEED OF THE PROPOSED PROJECT:

Purpose: 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. The proposed project is not a water dependent activity.

Need: Oxford Mining Company, LLC is proposing to conduct surface and auger mining activities on a 260.2-acre site to meet contractual obligations to deliver coal. This project will enable Oxford Mining Company, LLC to continue to provide approximately 100 jobs in Jefferson County. The secondary economic effects of the project cannot be quantified, but are certainly significant. Input to the local economy, including tax revenues generated by the proposed mining, is one justification for the proposed impacts and need for the project. The proposed project will produce enough coal to generate electricity for approximately 1 million people for 59 days.

1. PREFERRED ALTERNATIVE:

The preferred alternative is to extract the Pomeroy No. 8A and Pittsburgh 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 0.04 acres of jurisdictional wetlands and more than 3,490 linear feet of jurisdictional streams.

Description of Construction of Placement of Fill: Preferred Alternative

The preferred alternative would impact one jurisdictional wetland totaling 0.04 acre and 3,490 linear feet of jurisdictional streams. These waters are located within the Rush Run watershed. The process of removing the coal, construction of sediment ponds, and the transport of mine runoff will result in jurisdictional stream and wetland impacts. General characteristics of these resources can be found in the Preliminary Jurisdictional Determination Report. A comprehensive compensatory mitigation plan has been developed for this alternative.

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. Reclamation costs for the entire project site are estimated at $650,500.

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 not been developed for this alternative. After careful consideration, the applicant has decided not to pursue this alternative due to the added costs associated with bonding and mitigation.

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 site (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.8 and No.8A 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 though the area to the next reserve.

Social and Economic 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 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 impact of up to 260.2 acres for the purpose of mining coal. The proposed preferred alternative, if permitted, will reclaim the entire site (260.2 acres) according to ODNR and SMCRA regulations. The project will result in no lasting degradation of water quality.

On-site wetland mitigation will provide at least 1.5 times the acreage of wetlands (0.06 acres of wetland mitigation) that are impacted and these wetlands have the potential to develop to a higher quality that the existing wetlands. The mitigated wetland area will provide stable hydrology and improved habitat features that existing wetland. In addition, no effect on endangered or threatened species is expected.

2. 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 68% (102,891 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.

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% (102,891 tons). However, the operation would still require the construction of a haul road and

three sediment ponds compared to nine ponds under the preferred 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.

Social and Economic Benefits:

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 up to 100 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, 219,669 tons of coal would be lost as compared to the preferred alternative (68% reduction). The coal value under this alternative is approximately $3,086,730 to $3,498,294. The non-degradation alternative would result in $118,324 tax dollars in total. The social or economic benefits realized under this alternative would be reduced by some 68% as compared to the minimal degradation and preferred alternatives due to the reduction in coal production.

Environmental Benefits:

Under the avoidance alternative, no major environmental benefits would occur.

3. 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. 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 comprehensive compensatory mitigation plan has not been developed for this alternative. Materials discharged to jurisdictional waters overlie the coal, and include shale and sandstone. Following redistribution of overburden, stockpiled topsoil will be redistributed over the entire site.

A total of 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.

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 acres) 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 non-degradation alternative, the minimal degradation alternative would recover approximately 47% (92,258 tons) more coal while only requiring three additional sediment ponds. As proposed in the ODNR Mining Permit Application, the minimal degradation alternative is the most technically feasible and cost-effective method of coal extraction for the project area.

Social and Economic Benefits:

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 195,149 tons of coal. The “coal value” of the proposed alternative is therefore approximately $5,854,470– 6,635,066. 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 $224,421 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)
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> "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 195,149 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.

FINAL ENVIRONMENTAL ASSESSMENT

A. CONSERVATION

The applicant has made an effort to minimize impacts to jurisdictional waters of the U.S. to the extents practical, as significant area is needed to efficiently mine the site. These project proposes the use of sediment control structures to prevent the contribution of solids to stream located downstream of the project. During construction, the temporary sediment control structures may include temporary silt basins, ditches, straw bale fencing, and cloth filter fences. Measures proposed to be taken to control drainage around, over, and through the mining operation would include the construction of appropriately designed sediment ditches, diversion ditches, culverts, flumes and drains. Timely construction and maintenance of the sediment control structures combined with concurrent reclamation and revegetation of all disturbed areas will also minimize any downstream impacts. Monitoring of all outlets where water is discharged form the permit area would take place according to the approved Section 402 permit issued for this project. It is unlikely that the project would result in any long term adverse effects on human use characteristics such as municipal and private water supplies, recreational and commercial fisheries, water related recreation, aesthetics, or local, state, or national parks. In addition, no human health effects would result as a result of the proposed project.

B. ECONOMICS

The proposed project is anticipated to last five years from the original permit starting date. The project is necessary for Oxford Mining Company LLC. to continue to provide approximately 100 jobs in Jefferson County. The preferred alternative would also generate approximately $370,944 of taxes through the recovery of approximately 322,560 tons of coal. The "coal value" of the proposed alternative is therefore approximately $9,676,800 –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.

C. AESTHETICS

It is anticipated that temporary adverse impacts to visual aesthetics will occur as a result of construction, coal extraction, loading, and hauling. The waters proposed to be adversely impacted as a result of this project are located in relatively remote areas that are nearly all outside of public view. It is anticipated that the surrounding tree cover, in addition to the proposed reclamation activities would lessen visual impacts. The impacts to aesthetics are considered to be temporary and only be of issue while the project is under construction. As the reclamation and mitigation efforts are completed and mature the visual impacts will become increasingly less apparent.

D. WETLAND AND OTHER HIGH QUALITY AQUATIC SITES

Under the preferred alternative, primary and secondary impacts would occur on approximately 3,490 linear feet of jurisdictional streams and 0.04 acres of jurisdictional wetland. Information concerning the location, size, quality and composition of the individual resources is discussed in the General Descriptions of the Aquatic Environment Directly Affected and the Preliminary Jurisdictional Determination Report. Material which would be discharged to surface waters includes small, medium, and large coarse clean fill material. These materials are further described in Part 2, Drilling Reports – Surface, located in the ODNR Integrated Mining Permit Application.

Details concerning the mitigation for the streams and wetland impacted during the proposed project are discussed in the Compensatory Mitigation Plan. Mitigation for streams is proposed to be on site in the approximate location of the pre-impacted stream at a ratio of 1:1.

HISTORIC PROPERTIES

Potential impacts to historic properties were evaluated as part of the mining application review. ODNR concluded that no known historical, architectural or archaeological site list on or eligible for the National Register of Historic Places are located with the immediate vicinity of the project.

E. FLOOD HAZARDS

No flood hazards are associated with this project. Measures have been incorporated into the project to ensure safety of workers and public. These include the inspection and certification of all ponds to be constructed on the site to guarantee the integrity of any downstream land use.

F. FLOODPLAIN VALUES

The project is not located within any mapped floodplains. Impacts to floodplains of existing streams will be temporary. Erosion and sediment control measures will moderate any peak storm discharges from the site, thereby replacing this floodplain function temporarily. Site reclamation will restore floodplain functions and values of the streams impacted onsite.

G. LAND USE

The historical land use for the majority of the project site is mining and agriculture. A small portion of the property was previously mined for coal. No portions of the proposed permit area have been used historically as residential areas. Currently, the land use of the proposed site (260.4 acres total under the preferred alternative) includes undeveloped, cropland and grazingland. A majority of the undeveloped area and riparian areas are comprised of old field, woodland and scrub/shrub vegetation.

H. NAVIGATION

No navigable waterways are located within the permit area. None of the impacts proposed under the preferred alternative are expected to have any downstream effects including any effects that would impact navigable waterways. No impacts to navigation are anticipated to occur as a result of the proposed project.

I. RECREATION

The Pasco mine area is located on private land and serves a recreational function only to the owners and individuals with permission to use the properties. The primary recreational use is hunting. The post-mining site with continue to provide this function.

J. AND L. ENERGY AND MINERAL NEEDS

Oxford Mining Company, LLC has estimated that the proposed project will result in the recovery of 322,560 tons of coal.

M. SAFETY

The applicant will comply with all state and federal regulations. Measures incorporated into the project designed to ensure workers and public safety include: inspection and certification of the ponds and fills during and after construction, blasting plan that requires a minimum distance of 500 feet from any active or abandoned underground mine, and compliance with the GWPP. Workers safety issues would be administered by the Mine Safety and Health Administration (MSHA). Proposed haulage and access roads have been designed in accordance with the issued SMCRA permit. Overall this project should not result in any notable increase in truck traffic, nor should it result in any adverse effects on local road safety.

N. WATER QUALITY

The proposed project would result in temporary adverse impacts to these waters. Measures proposed to be implemented that would protect the wetlands and streams located on the site include the construction of sediment control ponds, diversion ditches, adherence to the approved SMCRA permit, adherence to the NPDES permit issued for the project, implementation of a materials handling plan, and reclamation of the site to a post-mining land use of grazing area and

fish and wildlife habitat. Slightly increased turbidity as a result of increases in total suspended solids (TSS) and total dissolved solids (TDS) would likely occur during project construction. It is anticipated that these impacts would be temporary and limited in nature. Provided the applicant adheres to the terms and conditions of each of the necessary permits, as proposed, the project and required compensatory mitigation should not result in any long term adverse effects on water quality.

O. FISH AND WILDLIFE VALUES

Due to the temporary loss of habitat, adverse impacts to fish and wildlife would occur. These effects would be minimized through the implementation of successful site reclamation following coal extraction. The applicant will use native plants throughout the mitigation areas associated with the site. However, in accordance with the SMRCA permit a mix of several species including native species, as well as several non-native species would be planted on the site.

During active mining, essentially all wildlife habitats would be eliminated form the site. Upon reclamation and successful revegetation, areas suited for various types of wildlife would again be recolonized. Since restoration of a diverse mature forest requires many years to achieve, this habitat type would not return to the site for approximately 20 – 30 years. As a result, the project would have temporal losses of habitat for species requiring mature forests for all or part of their development.

The project was also evaluated for potential effects to threatened and endangered species. Based on a review of all available information, it was determined that the proposed project would not affect any threatened or endangered species.

P. SHORE EROSION AND ACCRETION

No effect to shore erosion and accretion are expected to occur as a result of this proposed project.

Q. WATER SUPPLY AND CONSERVATION

There are no users of surface water within or near the permit area. In the unlikely event the project would affect any water users, the applicant would be required to mitigate these effects, in accordance with the issued SMCRA permit.

R. FOOD AND FIBER PRODUCTION

The project site had no pre-mining food or fiber production uses. Therefore, there would be no impact on food and fiber production as a result of the proposed mining activity. Marketable timber from the site will be harvested and utilized.

S. CONSIDERATIONS OF PROPERTY OWNERSHIP

All areas proposed to be utilized by the project are either owned by or are leased to the applicant for use as a coal mining operation. No lands contained in the permit area would require additional leased or acquisition before mining operation could commence.

T. GENERAL ENVIRONMENTAL CONCERNS

General environmental concerns associated with this project include blasting, noise and fugitive dust. These issues have been addressed by the ODNR through the SMRCA permit process.

BLASTING

To minimize off-site damage and/or provide public safety, Oxford Mining Company, LLC will provide residents or owners of each dwelling or other structure within one-half mile of the permit area with a blasting notice at least 30 days prior to the first blast. In addition, personnel will be checking high wall face and the shot pattern for cracks, mud seams or any other means that would cause flyrock and airblast.

NOISE

There are no environmental concerns related to noise that would result from the proposed project.

DUST

Oxford Mining Company, LLC will keep all supervisory personnel advised of all the rules and regulation of the Clean Air Act, and will act accordingly so no violations will occur. Dust will be minimized by spreading water on the roads as needed.

U. NEEDS AND WELFARE OF THE PEOPLE

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.