



MEMORANDUM

Date: February 7, 2025
To: Robin Reilley, DRMS
From: Joel Renfro, DRMS
RE: Seneca II-W Mine (C-1982-057),
SL-8 Bond Release Adequacy Review

This review was conducted to assess the reported vegetative success within the SL-8 Bond Release application. The methods and success standards outlined in the application were compared with the requirements specified in the Division's Regulations for Coal Mining and the approved Revegetation Plan (revised in 2014). The Division found that the application accurately represented these standards.

Bond Release Block 6 (BRB-6) was assessed for vegetative success in both 2022 and 2023. A minimum of 30 samples needed to be collected within this block. In each of the two years, 32 samples were gathered in BRB-6 to evaluate cover, production, and woody plant density. The Division agrees that 32 samples are sufficient for determining the vegetative success of this site.

In both 2022 and 2023, sampling results showed the following:

- The average allowable all-hit vegetative cover sampled in BRB-6 exceeded 90 percent of the area-weighted cover performance standard.
- The average allowable herbaceous production sampled in BRB-6 also surpassed 90 percent of the production performance standard.
- Woody plant density exceeded the mandatory performance standard of 180 stems per acre outlined in the Revegetation Plan.

The Division successfully replicated these results using the provided methodology and data.

Sampling shows that for species diversity, BRB-6 passed the mandatory test and at least two alternative tests, as outlined in the Revegetation Plan. The Division verified this finding as accurate.

The Division was able to follow the methods used to establish performance standards as described in the application, and agrees with the findings from Cedar Creek.



The Division requires additional information from the SL-8 Bond Release application for the following item:

Appendix F

1. Page 14 of the application mentions seed mixes used in reclamation are included for reference in Appendix F. The Division does not have additional pages for Appendix F, nor any seed mixes in the application. Please provide seed mixes used in reclamation under this Appendix.