

## **Permit Revision Application 2025-01 – Performance Bond Adjustment**

### **19.8.13.1301 D(2)(a):**

**An identification of the permit by permit number or other appropriate reference which is the subject of the revision;**

This revision request by Westmoreland San Juan Mining LLC (WSJM), San Juan Mine is made to New Mexico Mining and Minerals Division (MMD) for the performance bond of Permit #24-01, approved September 15, 2025.

### **19.8.13.1301 D(2)(b):**

**A specific description of the requested change in the terms of the permit;**

WSJM request the performance bond for the San Juan Mine permit (Permit #24-01) be reduced by \$25.699 million dollars based on changes to the maximum reclamation liability (as a result of mine closure under the Energy Transition Act of 2019, the “ETA”) and for approved bond releases that have reduced the performance bond liability. These requested changes are detailed below for the requirement of 19.8.13.1301 D(2)(c).

### **19.8.13.1301 D(2)(c):**

**A specific description of any changes in the mining and reclamation operation which may have an effect on performance bond requirements;**

Two categories of reduction are detailed for the basis of the bond reduction amount of \$25.699 million dollars. These are 1) for liability reductions from the Permit #19-01 term as the mine moved into closure from the ETA, and 2) reductions for approval bond releases that have been granted since the prior bond amount was ordered by the Director of MMD for the Permit #19-01 renewal.

The change in liabilities from the Permit #19-01 to the Permit #24-01 come from three items; coal combustion residual (CCR) placement over the prior permit term, a topsoil cost error in the 2019 bond value estimate, and facilities removed during the prior permit term. The total value of these three items is a bond reduction of \$15.667 million. These are each detailed as follows:

#### **CCR Placement**

During the Permit #19-01 term the mine moved from coal mining to full reclamation. Coal sales ended in September 2022. As the San Juan Generating Stations burned the coal, coal combustion residuals (CCRs) were transferred to WSJM for burial in the mine’s Pinon and Juniper Pits. The Permit #19-01 bond estimate did not account for the reduction in volume that the CCR placement would have on the reclamation liability because the calculation was for the worst-case scenario, as if the mine needed closure at the end of 2019 (standard bond estimate process). During the 2019 permit term the CCR

placed reduced the mine's liability through a non-direct reclamation process. The CCR volumes placed are shown in Table 1.

Table 1 - San Juan Mine CCR Volumes 2019-2022

CCR Period (Q/Y)	CCR Volume (Cyds)
Q2-2019	178,685
Q3-2019	269,949
Q4-2019	241,874
Q1-2020	216,689
Q2-2020	208,060
Q3-2020	259,035
Q4-2020	232,391
Q1-2021	211,771
Q2-2021	251,010
Q3-2021	207,126
Q4-2021	209,753
Q1-2022	197,259
Q2-2022	233,032
Q3-2022	217,195
TOTAL	3,133,829

The CCR quantity displaced truck and scraper volume based on the location of placement and the amount of spoil required to come from previously completed reclamation (the previous work area is where the volume for future movement was reduced). The 2019 bond estimate unit cost split for truck and scraper costs with indirect costs added is \$2.66 per cubic yard (\$2.659448 unrounded). This equates to a value (liability) reduction of from the 2019 bond of \$8,334,256 by having placed ash in the pits during the permit term.

#### 2019 Bond Estimate Pinon Topsoil Cost Error

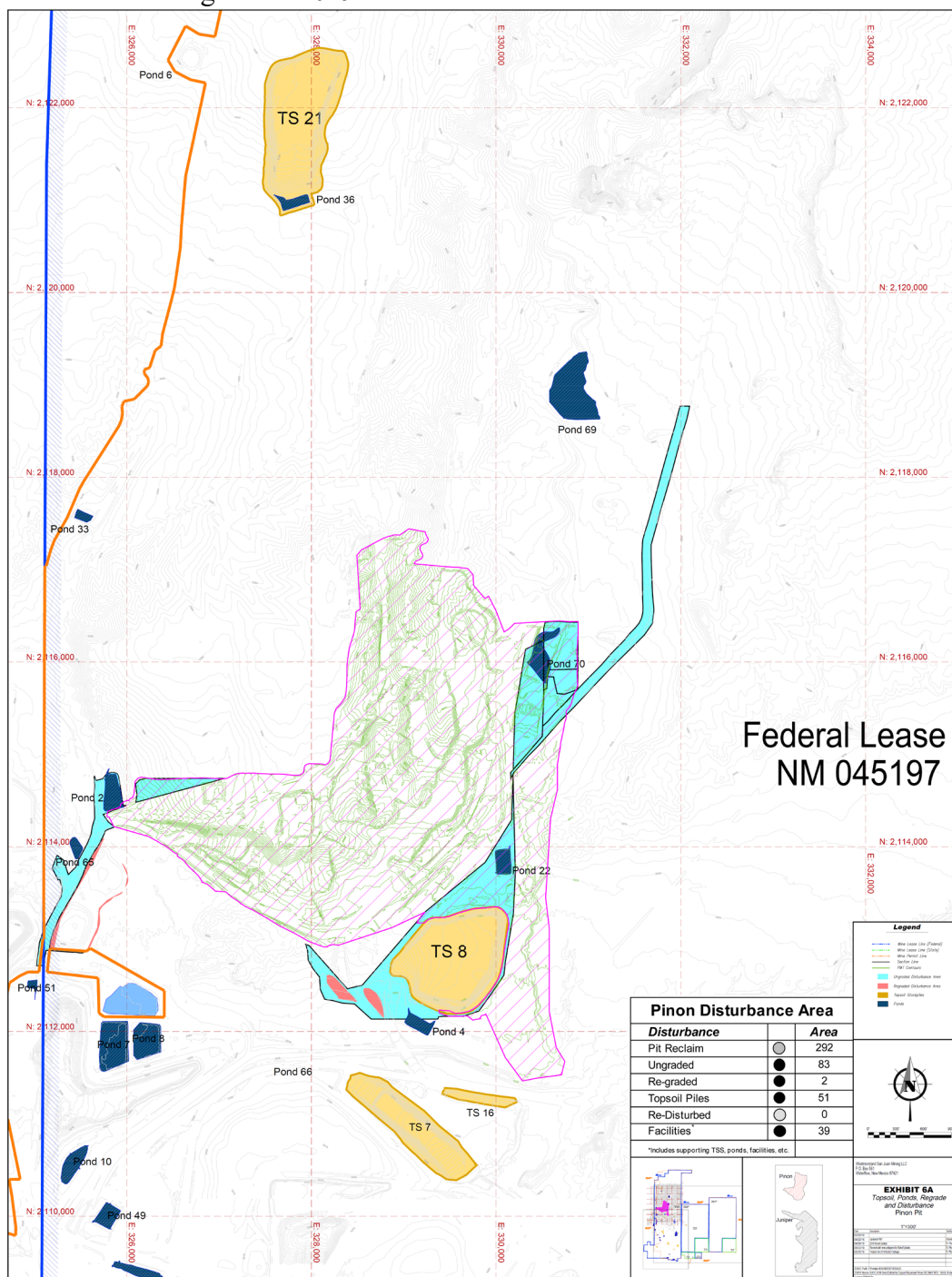
The 2019 bond estimate had an error in the Pinon Pit topsoil placement volumes. The volume entered for Pinon Pit completion of topsoil was 3,107,781 cubic yards of topsoil. At the time of the 2019 estimate the mine only needed 292 acres (verified by the 2019 annual report showing a remaining topsoil area of 289 acres, Table 2) of topsoil laydown in Pinon Pit.

Table 2 - Topsoil Summary from 2019 Annual Report

TABLE 507.B-8A 2019 PINON PIT AREA SOIL VOLUMETRICS	
Description	Quantities
Stockpiled Topdressing	593,930 yds
Unsalvaged Topdressing+	165,222 yds
Total in Stockpile and Unsalvaged	759,152 yds
80% Topdressing Recovery	607,322 yds
Disturbance Area Not Topsoiled	289 ac
Average Respread Thickness	16 in

The areas needing topsoil from the bond estimate can be seen in Figure 1 (supported by the annual summary in Table 2).

Figure 1 - 2019 Bond Estimate Pinon Pit Bond Areas



The 2019 thickness estimate for topsoil was 16 inches for Pinon Pit areas (referring to the Annual Report that year). This equates to a volume of 628,124 cubic yards to cover 292

acres. This was an error in the 2019 bond estimate of 2,479,657 cubic yards of topsoil movement. It is not known where the error was derived during the 2019 bond estimate.

The error is verified by reviewing the Annual Reports for 2018 where the amount available for placement is barely ½ of the total topsoil volume in the 2019 bond estimate and varies from the 2019 bond estimate amount by 2.4M cyds (2019 bond estimate at 6.2M cyds vs the 2018 Annual Report at 3.8M cyds).

Based on 2019 bond estimate unit cost for topsoil placement, with indirect additions, is \$2.13 per cubic yard. The topsoil volume error overestimated the 2019 bond estimate by \$5,290,082.

### Liability Reduced Through Facility Demolition Completed

The mine has removed all the underground facilities (except the road in the GVB area), all the coal preparation plant, and some of the main shop area facilities. The 2019 bond estimate facilities with items removed are highlighted on Tables 3, 4, and 5. The left side of each table is from the 2019 estimate, and the right side is 2024 bond estimate (with inflation adjustments added).

Table 3 – Building & Slab Reductions (2019 vs 2024)

BUILDING DEMOLITION 2019						BUILDING DEMOLITION 2024							
	AREA (SQ. FT.)	VOLUME (CU. FT.)		UNIT COST (\$ / CU. FT.)	TOTAL		AREA (SQ. FT.)	VOLUME (CU. FT.)		UNIT COST (\$ / CU. FT.)	TOTAL		
STRUCTURAL STEEL						STRUCTURAL STEEL							
EQ WAREHOUSE / TRAILER	3,342	46,788		\$0.30	\$13,992	EQ WAREHOUSE / TRAILER	3,342	46,788		\$0.34	\$15,988		
CORE SHED	840	16,800		\$0.32	\$5,428	CORE SHED	840	16,800		\$0.37	\$6,202		
LEARNING CENTER	8,284	99,408		\$0.32	\$32,118	LEARNING CENTER	7,500	90,000		\$0.37	\$33,225		
WELD / BUCKET SHOP	8,917	401,265		\$0.32	\$129,645	WELD / BUCKET SHOP	8,917	401,265		\$0.37	\$148,136		
SHOP / WAREHOUSE / CHANGEROOM	38,529	1,155,870		\$0.32	\$373,452	SHOP / WAREHOUSE / CHANGEROOM	38,529	1,155,870		\$0.37	\$426,715		
ADMINISTRATION / OFFICES	13,918	194,852		\$0.32	\$62,955	ADMINISTRATION / OFFICES (done)	0	0		\$0.37	\$0		
FIELD MAINTENANCE	4,200	59,640		\$0.32	\$19,269	FIELD MAINTENANCE	4,200	59,640		\$0.37	\$22,017		
COAL PREP PLANT	33,674	448,648		\$0.32	\$144,954	COAL PREP PLANT (done)	0	0		\$0.37	\$0		
CONVEYOR TOWERS	-	1,001,000		\$0.32	\$323,415	CONVEYOR TOWERS (done)	-	0		\$0.37	\$0		
CONVEYOR SHAFTS	-	14,074		\$0.32	\$4,547	CONVEYOR SHAFTS (done)	-	0		\$0.37	\$0		
OTHER BUILDINGS	9,255	129,570		\$0.32	\$41,863	OTHER BUILDINGS	689	9,646		\$0.37	\$3,561		
HAZARDOUS WASTE STORAGE	900	500		\$0.32	\$162	HAZARDOUS WASTE STORAGE	900	500		\$0.37	\$185		
PRE-FAB CONCRETE						PRE-FAB CONCRETE							
CONVEYOR SHAFTS	-	18,850		\$0.32	\$6,090	CONVEYOR SHAFTS (done)	-	0		\$0.37	\$0		
SUBTOTAL BUILDING REMOVAL						SUBTOTAL BUILDING REMOVAL							
CONCRETE SLAB DEMOLITION 2019						CONCRETE SLAB DEMOLITION 2024							
	AREA (SQ. FT.)	SLAB THICKNESS (INCHES)	DEMOLITION UNIT COST (\$ / SQ. FT.)	PERI- METER (FT.)	FOOTING DEMOLITION (\$ / FT.)	TOTAL		AREA (SQ. FT.)	SLAB THICKNESS (INCHES)	DEMOLITION UNIT COST (\$ / SQ. FT.)	PERI- METER (FT.)	FOOTING DEMOLITION (\$ / FT.)	TOTAL
EQ WAREHOUSE	3,342	6	\$5.03	213	\$14.39	\$19,871	EQ WAREHOUSE	3,342	6	\$5.75	213	\$16.44	\$22,705
CORE SHED	840	6	\$5.03	168	\$14.39	\$6,642	CORE SHED	840	6	\$5.75	168	\$16.44	\$7,589
LEARNING CENTER	8,284	6	\$5.03	541	\$14.39	\$49,442	LEARNING CENTER	7,500	6	\$5.75	351	\$16.44	\$48,865
WELD / BUCKET SHOP	8,917	24	\$21.74	418	\$14.39	\$199,871	WELD / BUCKET SHOP	8,917	24	\$24.84	418	\$16.44	\$228,377
SHOP / WAREHOUSE / CHANGEROOM	38,529	24	\$21.74	1016	\$14.39	\$852,242	SHOP / WAREHOUSE / CHANGEROOM	38,529	24	\$24.84	1016	\$16.44	\$973,791
ADMINISTRATION / OFFICES	13,918	6	\$5.03	1084	\$14.39	\$85,588	ADMINISTRATION / OFFICES (done)	0	6	\$5.75	0	\$16.44	\$0
FIELD MAINTENANCE	4,700	6	\$5.03	334	\$14.39	\$28,441	FIELD MAINTENANCE	4,700	6	\$5.75	334	\$16.44	\$32,497
WASH FACILITY	3,243	24	\$21.74	242	\$14.39	\$73,986	WASH FACILITY	3,243	24	\$24.84	242	\$16.44	\$84,538
COAL PREP PLANT	33,674	6	\$5.03	184	\$14.39	\$171,970	COAL PREP PLANT (done)	0	6	\$5.75	0	\$16.44	\$0
OTHER BUILDINGS	9,734	6	\$5.03	801	\$14.39	\$60,475	OTHER BUILDINGS	1,168	6	\$5.75	801	\$16.44	\$19,883
HAZARDOUS WASTE STORAGE	900	6	\$5.03	30	\$14.39	\$4,957	HAZARDOUS WASTE STORAGE	900	6	\$5.75	30	\$16.44	\$5,664
SIDEWALKS	15,309	6	\$5.03	0	\$14.39	\$76,981	SIDEWALKS	15,309	6	\$5.75	0	\$16.44	\$87,960
SUBTOTAL CONCRETE DEMOLITION						\$1,630,466	SUBTOTAL CONCRETE DEMOLITION						\$1,511,870

Table 4 – Concrete Removal, Pavement &amp; Total, Surface Demo (2019 vs 2024)

CONCRETE REMOVAL 2019							CONCRETE REMOVAL 2024								
	AREA (SQ. FT.)	SLAB THICKNESS (INCHES)	PERI- METER (FT.)	TOTAL VOLUME (CYD)	DISPOSAL ON-SITE (\$ / CU. YD.)	TOTAL		AREA (SQ. FT.)	SLAB THICKNESS (INCHES)	PERI- METER (FT.)	TOTAL VOLUME (CYD)	DISPOSAL ON-SITE (\$ / CU. YD.)	TOTAL		
EQ WAREHOUSE	3,342	6	\$213.00	1020	\$8.58	\$8,751	EQ WAREHOUSE	3,342	6	\$213.00	1020	\$9.80	\$10,000		
CORE SHED	840	6	\$168.00	772	\$8.58	\$6,617	CORE SHED	840	6	\$168.00	772	\$9.80	\$7,561		
LEARNING CENTER	8,284	6	\$541.00	2588	\$8.58	\$22,195	LEARNING CENTER	7,500	6	\$351.00	1718	\$9.80	\$16,840		
WELD / BUCKET SHOP	8,917	24	\$418.00	2942	\$8.58	\$21,788	WELD / BUCKET SHOP	8,917	24	\$418.00	2942	\$9.80	\$24,906		
SHOP / WAREHOUSE / CHANGEROOM	38,529	24	\$1,016.00	7426	\$8.58	\$63,690	SHOP / WAREHOUSE / CHANGEROOM	38,529	24	\$1,016.00	7426	\$9.80	\$72,774		
ADMINISTRATION / OFFICES	13,918	6	\$1,084.00	5136	\$8.58	\$44,047	ADMINISTRATION / OFFICES (done)	0	6	\$0.00	0	\$9.80	\$0		
FIELD MAINTENANCE	4,700	6	\$334.00	1590	\$8.58	\$13,637	FIELD MAINTENANCE	4,700	6	\$334.00	1590	\$9.80	\$15,582		
WASH FACILITY	3,243	24	\$242.00	1329	\$8.58	\$11,400	WASH FACILITY	3,243	24	\$242.00	1329	\$9.80	\$13,026		
COAL PREP PLANT	33,674	6	\$183.50	1449	\$8.58	\$12,431	COAL PREP PLANT (done)	0	6	\$0.00	0	\$9.80	\$0		
OTHER BUILDINGS	9,734	6	\$801.00	3785	\$8.58	\$32,460	OTHER BUILDINGS	1,168	6	\$801.00	3626	\$9.80	\$35,535		
HAZARDOUS WASTE STORAGE	900	6	\$30.00	152	\$8.58	\$1,301	HAZARDOUS WASTE STORAGE	900	6	\$30.00	152	\$9.80	\$1,486		
SIDEWALKS	15,309	6	\$0.00	284	\$8.58	\$2,431	SIDEWALKS	15,309	6	\$0.00	284	\$9.80	\$2,778		
SUBTOTAL CONCRETE REMOVAL						\$240,760	SUBTOTAL CONCRETE REMOVAL						\$200,469		
FENCE AND POWERLINE REMOVAL 2019							FENCE AND POWERLINE REMOVAL 2024								
	LENGTH (FT.)				UNIT COST (\$ / FT.)	TOTAL		LENGTH (FT.)				UNIT COST (\$ / FT.)	TOTAL		
FENCE	4,260				\$2.97	\$12,663	FENCE	4,260				\$3.40	\$14,469		
POWER LINES	17,520				\$1.58	\$27,946	POWER LINES	17,520				\$2.06	\$36,043		
SUBTOTAL FENCE AND POWERLINE REMOVAL						\$87,609	SUBTOTAL FENCE AND POWERLINE REMOVAL						\$112,817		
PAVEMENT REMOVAL 2019							PAVEMENT REMOVAL 2024								
	AREA (SQ. YD.)				UNIT COST (\$ / SQ. YD.)	TOTAL		AREA (SQ. YD.)				UNIT COST (\$ / SQ. YD.)	TOTAL		
ACCESS ROAD & PARKING LOTS	24,150				\$3.30	\$79,728	ACCESS ROAD & PARKING LOTS	24,150				\$3.77	\$91,100		
SUBTOTAL PAVEMENT REMOVAL						\$79,728	SUBTOTAL PAVEMENT REMOVAL						\$91,100		
TOTAL DEMOLITION AND DISPOSAL COSTS 2019							TOTAL DEMOLITION AND DISPOSAL COSTS 2024								
TOTAL FACILITIES REMOVAL							\$3,196,455	TOTAL FACILITIES REMOVAL							\$2,571,806

Even with consideration for significant escalation, the direct value reduction in 2019 bond estimate demo costs have been reduced by \$624,649 through the removal of these surface mining facilities. The impact of the removal of the underground facilities is shown in Table 5 (again, comparing 2019 bond estimate to the estimate in the 2024 bond estimate for the remaining structure work).

Table 5 – Underground Mine Facility Removal Costs (2019 vs 2024)

SAN JUAN DEEP MINE RECLAMATION - 2019		SAN JUAN DEEP MINE RECLAMATION - 2024	
	TOTAL		TOTAL
<b>ACTIVITY</b>		<b>ACTIVITY</b>	
SEAL OPENINGS	\$909	SEAL OPENINGS	\$0
FACILITIES REMOVAL	\$1,177,583	FACILITIES REMOVAL	\$465,718
UTILITIES SUBSIDENCE MITIGATION	\$254,685	UTILITIES SUBSIDENCE MITIGATION	\$25,943
CHANNEL PROTECTION (SUBSIDENCE MITIGATION)	\$316,736	CHANNEL PROTECTION (SUBSIDENCE MITIGATION)	\$244,863
<b>SAN JUAN DEEP MINE DIRECT COST</b>	<b>\$1,749,913</b>	<b>SAN JUAN DEEP MINE DIRECT COST</b>	<b>\$736,524</b>

The direct value reduction in 2019 bond estimate demo costs have been reduced by \$1,013,389 through the removal of the underground mine facilities. All of the buildings and conveyor transport structures for the underground have been removed. With the 24.7% indirect cost consideration, the removal of the building completed so far reduces the 2019 bond estimate by \$2,042,643.

In this first of two categories WSJM request that the ordered amount be reduced by \$15.667 million dollars to \$79.723 million dollars for these three items.

In the second category of reduction items WSJM requests reductions to the remaining \$79.723 million dollars for recently approved bond releases.

The three approved bond releases have reduced the mine performance amount. None of the applications made a requested reduction based on the past practice of these reductions being valued

as part of the estimated performance bond updates (completed at permit renewal under previous MMD Directors). These three bond releases have a total reduction value of \$10.032 million dollars and each is detailed in the following:

Bond Value Reduction from Pinon Phase I Approval of 618 Acres 9/16/2024

Westmoreland San Juan Mining LLC (WSJM) is requesting the Reclamation Bond be reduced by \$9.792 million dollars for release approved under NMAC 19.8.14.1412 on 9/16/2024. As previously discussed, when the release request was submitted, WSJM anticipated that the monetary value would reduce the bond value with the 2024 permit term bond estimate calculation, as had been done in prior bond revisions at permit term renewals. Thus, WSJM had not requested a reduction in the bond release application for this Phase I.

Following the process of NMAC 19.8.14.1412 WSJM has determined what the approvals would have requested in reduction following the regulations. The basis of value for SJM as is shown in the following table.

Current Bond (000s)	\$79,723	(original at \$95.390M, revision requested to remove items from 2019 permit term no longer applicable)
Bond Year Submitted	2019	(includes reduction of \$15.667M for liability adjustments submitted July 18, 2025)
Bonded Acres	3,019	(include potential second seeded rate of 10% as acres, actual acres of work remaining was 2,777)
Revegetation Cost/Acre	\$1,789	(from the 2024 bond estimate update, most current re-vegetation value)
Total Value/Acre (000s)	\$26.407	(value per acre of all three release phases based on bond \$ and bonded area)
Phase I NMAC Percentage	60%	(NMAC regs)

For Phase I, following NMAC 19.8.14.1412 the following value per acre is determined:

Phase I Value/Acre (000s)	\$15.844	(based on 60% of the per acre bonded cost per NMAC)
---------------------------	----------	---

For the Phase I approval of these 618 Acres 9/16/2024. The value for reduction from the bond is as follows:

$(618 \text{ Ac}) * (\$15,844/\text{Ac}) =$	\$9,792,000	(value of 618 acres bonded at 60% based on NMAC)
---	-------------	--

Bond Value Reduction from Cottonwood Phase II & III Approval of 1325 Acres (1201 Ac of the 1325 Ac were reclaimed) 6/6/2025

Westmoreland San Juan Mining LLC (WSJM) is requesting the Reclamation Bond be reduced by \$215 thousand dollars for release approved under NMAC 19.8.14.1412 on 6/6/2025. As previously discussed, when the release request was submitted, WSJM anticipated that the monetary value would reduce the bond value with the 2024 permit term bond estimate calculation, as had been done in prior bond revisions at permit term renewals. Thus, WSJM had not requested a reduction in the bond release application for this Phase II & III release.

Following the process of NMAC 19.8.14.1412 WSJM has determined what the approvals would have requested in reduction following the regulations. The basis of value for SJM as is shown in the following table.

Application Letter – San Juan Mine Permit Revision 2025-01 – Performance Bond Adjustment

Current Bond (000s)	\$79,723	(original at \$95.390M, revision requested to remove items from 2019 permit term no longer applicable)
Bond Year Submitted	2019	(includes reduction of \$15.667M for liability adjustments submitted July 18, 2025)
Bonded Acres	3,019	(include potential second seeded rate of 10% as acres, actual acres of work remaining was 2,777)
Revegetation Cost/Acre	\$1,789	(from the 2024 bond estimate update, most current re-vegetation value)
Total Value/Acre (000s)	\$26.407	(value per acre of all three release phases based on bond \$ and bonded area)
Phase I NMAC Percentage	60%	(NMACregs)

For Phase II & III, following NMAC 19.8.14.1412 the following value per acre is determined:

Phase II Value/Acre (000s)	\$8.774	(the amount of value per acre after Phase I amount less the potential re-vegetation cost for Phase III)
Phase III Value/Acre (000s)	\$1.789	(based on estimate for the value retained for Phase III to re-vegetate if needed by NMAC)

For the Phase II & III approval of these 1201 Acres 6/6/2025. The value for reduction from the bond is as follows:

$(1201 \text{ Ac}) * (\$1,789 / \text{Ac}) * (10\%) =$	\$215,000	(2020 Phase II & III were only represented in the 2019 bond for 10% redo revegation. No Phase II value was assigned)
--	-----------	--

Bond Value Reduction from Cottonwood Phase II & III Approval of 141 Acres 9/5/2024

Westmoreland San Juan Mining LLC (WSJM) is requesting the Reclamation Bond be reduced by \$25 thousand dollars for release approved under NMAC 19.8.14.1412 on 9/5/2024. As previously discussed, when the release request was submitted, WSJM anticipated that the monetary value would reduce the bond value with the 2024 permit term bond estimate calculation, as had been done in prior bond revisions at permit term renewals. Thus, WSJM had not requested a reduction in the bond release application for this Phase II & III release.

Following the process of NMAC 19.8.14.1412 WSJM has determined what the approvals would have requested in reduction following the regulations. The basis of value for SJM as is shown in the following table.

Current Bond (000s)	\$79,723	(original at \$95.390M, revision requested to remove items from 2019 permit term no longer applicable)
Bond Year Submitted	2019	(includes reduction of \$15.667M for liability adjustments submitted July 18, 2025)
Bonded Acres	3,019	(include potential second seeded rate of 10% as acres, actual acres of work remaining was 2,777)
Revegetation Cost/Acre	\$1,789	(from the 2024 bond estimate update, most current re-vegetation value)
Total Value/Acre (000s)	\$26.407	(value per acre of all three release phases based on bond \$ and bonded area)
Phase I NMAC Percentage	60%	(NMACregs)

For Phase II & III, following NMAC 19.8.14.1412 the following value per acre is determined:

Phase II Value/Acre (000s)	\$8.774	(the amount of value per acre after Phase I amount less the potential re-vegetation cost for Phase III)
Phase III Value/Acre (000s)	\$1.789	(based on estimate for the value retained for Phase III to re-vegetate if needed by NMAC)

For the Phase II & III approval of these 141 Acres 9/5/2024. The value for reduction from the bond is as follows:

$(141 \text{ Ac}) * (\$1,789 / \text{Ac}) * (10\%) =$	\$25,000	(Cottonwood was only represented in the 2019 bond for 10% redo revegation. No Phase II value was assigned)
---	----------	--

This second category (for approved releases totals \$10.032 million dollars. This requested reduction from the first category remaining value \$79.723 million dollars results in a final

remaining bond amount of \$69.691 million dollars. The total requested reduction from both categories is \$25.699 million dollars.

Based on the bond estimate provided to MMD with the Permit#24-01 renewal (submitted in May of 2024 shows the total remaining liability \$49.647 million dollars). This is compared to the requested bond amount of \$69.691 million dollars (resulting from the requested reduction). The difference of \$20.044 million dollars is from work that the mine has completed in reclamation but has not yet been released in bond releases.

**19.8.11.1100 B**

**...an applicant for a new permit or for a permit revision under 19.8.13.1301 NMAC shall submit, at the time of filing the application, a plan approved by the director to provide notice using at least three of the methods listed...**

Draft public notice for publication in the Farmington Daily Times, once MMD has advised Westmoreland San Juan Mining LLC that the administratively complete, is provided in **Appendix A - Draft Public Notice**. A copy of the revision application will be placed at the Farmington Public Library in Farmington, New Mexico at the same time as posting, publication, and announcements are made.

Westmoreland will use the following three methods for public notice.

- 1) Posting a notice in at least four publicly accessible and conspicuous places, including the entrance to the proposed operation if that entrance is publicly accessible and conspicuous. These locations will be at:
  - a. Waterflow, NM Postal Office
  - b. Kirtland, NM Postal Office
  - c. Farmington Public Library
  - d. San Juan Mine Entrance (guard post)
- 2) Publishing a notice in a display ad at least three inches by four inches at a place in the newspaper calculated to give the general public the most effective notice. The notice will run once a week for four consecutive weeks as required under 19.8.11.1100. Westmoreland will use the following newspaper for published notice:
  - a. The Tri-City Record (formerly known as the Farmington Daily Times)
- 3) Broadcasting public service announcements on radio stations that serve the general permit area. The radio stations used will be:
  - a. KTRA 102.1 FM Farmington, NM
  - b. KENN 1390 AM Farmington, NM
  - c. KTNN 660 AM Farmington, NM