

OFFICE OF SURFACE MINING RECLAMATION AND ENFORCEMENT

Annual Evaluation Summary Report

For the

Regulatory and Abandoned Mine Lands Programs

Administered by the State

Of

MISSOURI

For

Evaluation Year 2010

July 1, 2009 to June 30, 2010

August 2010

SEP 03 2010

EXECUTIVE SUMMARY

During the 2010 Evaluation Year, the Office of Surface Mining Reclamation and Enforcement, Alton Field Division conducted oversight evaluations of the Missouri Department of Natural Resources, Land Reclamation Program Regulatory and Abandoned Mine Land Programs. The oversight studies focused on the success of the Missouri Land Reclamation Program in meeting the Surface Mining Control and Reclamation Act of 1977 goals for environmental protection and prompt, effective reclamation of land mined for coal. A Partnership Plan in the form of a Performance Agreement was cooperatively developed by the Alton Field Division and the Missouri Land Reclamation Program to tailor the oversight activities to the unique conditions of the State program. The purpose of the oversight activities was to identify the need for financial, technical, and other program assistance to strengthen the State program. Evaluation Year 2010 marks the fourth full evaluation year since the Missouri Land Reclamation Program resumed full primacy on February 1, 2006.

In support of the Office of Surface Mining Reclamation and Enforcement's national initiatives and national priorities, the Alton Field Division and the Mid-Continent Region's Program Support Division conducted studies in the Title V areas of off-site impacts, reclamation success (bond release), and customer service. In addition two National Priority Review Topics were included in our studies: Approximate Original Contour and State Calculation of Performance Bond Amounts.

OFF-SITE IMPACTS – Data on off-site impacts were collected during Federal and State inspections. No off-site impacts were identified at the 7 active units in Missouri. One off-site impact that was identified prior to Evaluation Year 2010 remained at a bond forfeiture site. Over 93 percent of the 16 Inspectable Units that composed Missouri's Inspectable Units list at the end of the evaluation year were free from off-site impacts in Evaluation Year 2010. Off-site impacts are being eliminated as bond forfeiture reclamation is completed.

RECLAMATION SUCCESS - During Evaluation Year 2010, the Missouri Land Reclamation Program released phase I bond on 3.0 acres, phase II bond on 656.0 acres, and phase III bond on 729.2 acres. Based on field observations and review of documentation contained in bond release request files, the Office of Surface Mining Reclamation and Enforcement determined that all the bond release applicants met the performance standards for each phase of bond being requested for release, and the State appropriately released the bonds as requested. No new acres were bonded in Missouri during the evaluation period.

CUSTOMER SERVICE: APPLICANT VIOLATOR SYSTEM USAGE AND IMPLEMENTATION - The Alton Field Division concluded that even though the Missouri Land Reclamation Program did not meet the recommended time frames for completing Applicant Violator System actions on two occasions, the State is fulfilling the purpose of the Applicant Violator System by entering all permit actions into the Applicant Violator System. The Alton Field Division recommended that all Missouri

Land Reclamation Program employees who currently have Applicant Violator System responsibilities attend training at the first available opportunity.

CUSTOMER SERVICE: CITIZEN COMPLAINTS – Review of the State’s citizen complaint files revealed the Missouri Land Reclamation Program has not received any citizen’s complaints since February 1, 2006, when the State reassumed full Regulatory Title V primacy; therefore, the Alton Field Division could not complete this topical study planned for EY 2010.

National Priority Review Topics

APPROXIMATE ORIGINAL CONTOUR - Review findings were that the Missouri Land Reclamation Program is successfully implementing its program requirements for approximate original contour and mined land in Missouri is being reclaimed and restored to its approximate original contour. As required by Directive REG-8, Appendix 1, the Alton Field Division should obtain an official concurrence with the Missouri Land Reclamation Program on an accepted interpretation of approximate original contour.

STATE CALCULATION OF PERFORMANCE BOND AMOUNTS - The Mid-Continent Region’s Program Support Division found that the Missouri Land Reclamation Program follows OSM’s “Handbook for Calculation of Reclamation Bond Amounts” (Directive TSR-1) to calculate required bond amount. The Missouri Land Reclamation Program’s method of determining bond amounts for permits and permit revisions ensures that sufficient funds are available for completion of the reclamation plan by a third party in the event of bond forfeiture at the point of maximum reclamation liability during the term of the permit. The Missouri Land Reclamation Program does not have a method to adjust bond amounts or provide financial assurance to cover the costs of treating any anticipated long-term polluttional discharges.

General oversight topic reviews were conducted for both the State Regulatory and Abandoned Mine Land Programs. The following reports were completed:

BOND FORFEITURE RECLAMATION – The Office of Surface Mining Reclamation and Enforcement has been concerned about the backlog of reclamation that needs to be accomplished at bond forfeiture sites in Missouri. During Evaluation Year 2010, the Missouri Land Reclamation Commission released forfeiture reclamation liability on 280.0 acres covered by interim program permits. The Office of Surface Mining Reclamation and Enforcement determined that the Missouri Land Reclamation Program continued to pursue completion of bond forfeiture reclamation in Evaluation Year 2010.

ABANDONED MINE LAND RECLAMATION PROGRAM AMENDMENT PROCESSING - When this work element was included in the EY 2010 Performance Agreement, the Office of Surface Mining anticipated that a clear understanding of how to proceed with amendments to state Abandoned Mine Land Program Plans would exist, and Part 884 notifications would have been issued to the States/Tribes. Part 884

notifications were not issued by the end of EY 2010; therefore, this oversight assistance effort will be carried forward and conducted at the appropriate time.

ABANDONED MINE LAND INVENTORY SYSTEM CERTIFICATION AND DATA ACCURACY – The Alton Field Division verified that Missouri’s certified procedures are being appropriately implemented, and data accuracy is being maintained in accordance with the policy and procedures outlined by the Office of Surface Mining Reclamation and Enforcement’s Directive AML-1.

IMPLICATION OF RESEDENTIAL DEVELOPMENT OCCURRING ON OR NEAR UN-RECLAIMED MINE LANDS IN MISSOURI - Public development on problem areas is not currently considered to be a major problem in Missouri, although such encroachment does appear to be happening more frequently than in the past. The Missouri Land Reclamation Program/Alton Field Division staff decided to develop an educational outreach brochure that explains the problems and hidden dangers that may result when un-reclaimed mine lands are developed for public or private use.

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Cover page is a photo of reclaimed bond forfeiture land at Missouri Mining Pit 3 in Putnam County, Missouri

I. Introduction

The Surface Mining Control and Reclamation Act of 1977 (SMCRA) created the Office of Surface Mining Reclamation and Enforcement (OSM) in the Department of the Interior. SMCRA provides authority to OSM to oversee the implementation of and provide Federal funding for the State regulatory programs that have been approved by OSM as meeting the minimum standards specified by SMCRA. This report contains summary information regarding the Missouri Program and the effectiveness of the Missouri Land Reclamation Program (MLRP) in meeting the applicable purposes of SMCRA as specified in section 102. This report covers the period of July 1, 2009 to June 30, 2010. Detailed background information and comprehensive reports for the program elements evaluated during the period are available for review and copying at the Mid Continent Region (MCR) Office in Alton, Illinois.

The following list of acronyms is used in this report:

AFD – Alton Field Division

AML – Abandoned Mine Land

AMLIS – Abandoned Mine Land Inventory System

AVS – Applicant Violator System

BTU – British Thermal Unit

DOI – Department of the Interior

EY – Evaluation Year

IMCC – Interstate Mining Compact Commission

IU – Inspectable Unit

MCR – Mid Continent Region

MLRP – Missouri Land Reclamation Program

MLRC – Missouri Land Reclamation Commission

MOU – Memorandum of Understanding

OSM – Office of Surface Mining Reclamation and Enforcement

PA – Performance Agreement

PHA – Post-mining Hydrology Assessment

PSD – Program Support Division

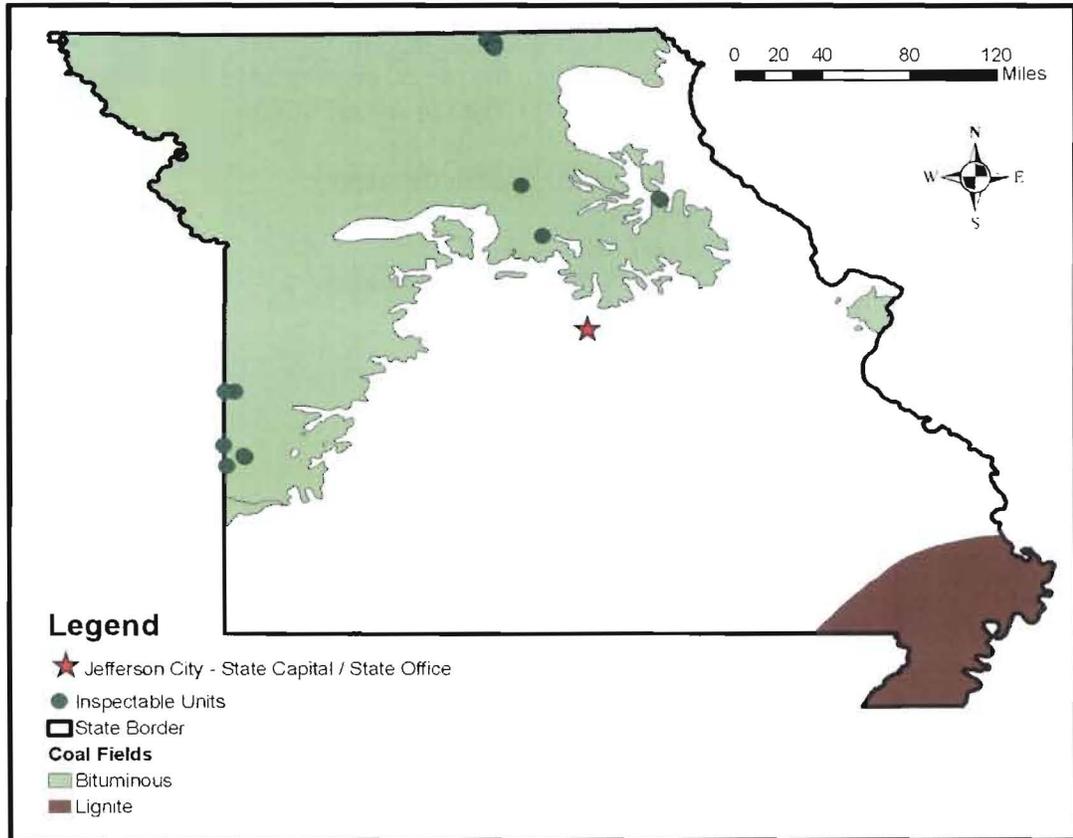
SMCRA – Surface Mining Control and Reclamation Act

II. Overview of the Missouri Coal Mining Industry

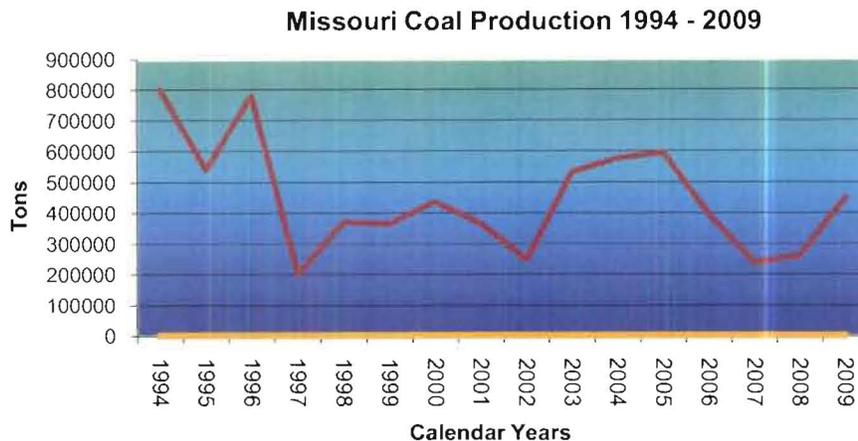
Coal deposits were first mined in Missouri in the late 1840's, giving the state the distinction of being the first state west of the Mississippi River to produce coal for commercial use. Although most of the early coal mines in the state were underground, surface mining began in the mid 1930's, and has accounted for virtually all the coal produced in Missouri since the 1960's. Approximately 67,000 acres were affected by coal mining in 48 Missouri counties before enactment of the SMCRA in 1977.

Missouri's coal ranges from lignite to high volatile A bituminous. Its coal reserve is estimated to be six billion tons, accounting for between one and two percent of the coal reserves in the United States. The coal-bearing areas cover about 23,000 square miles,

or 33 percent of the State. Twelve of the 20 identified coal seams have been actively mined. The coal has a high heat value, averaging twenty-two million British Thermal Units (BTU) per short ton. The sulphur content of 95 percent of Missouri's reserves is relatively high, greater than 2.5 pounds of sulphur per million BTU and averaging four percent by weight. Economics generally limit production to coal seams greater than 28 inches thick. Coal production is currently confined to the southwest portion of the State in Bates County. Missouri supplies coal to the mid-western market for blending with western coal. The current primary use of the coal is for power generation.



Coal production in Missouri reached its peak in 1984 when nearly seven million tons were mined. A sharp decline to 627,774 tons occurred in 1993, down from the 1992 production level of 2,908,012 tons, after the state's largest operator ceased production in early 1993. Annual production has fluctuated during the last decade: however, production remained relatively steady during the period 2003-2005 when the two currently producing operations mined an average of about 569,000 tons per year. Production dropped to 394,099 tons in calendar year 2006 and continued to decline in 2007 when only 236,108 tons were produced. A slight increase in production occurred in calendar year 2008 when 262,025 tons were mined. This trend continued in 2009 when 449,526 tons were produced.



III. Overview of the Public Participation Opportunities in the Oversight Process and the State Program

Missouri and OSM consider the bi-monthly Missouri Land Reclamation Commission (MLRC) public meetings the principal forum for participation from industry, landowners, citizen groups, and other interested parties. Whenever the opportunity arises, MLRP personnel attend and set up displays explaining MLRP’s responsibilities and accomplishments at public gatherings and conferences. Press releases are completed for larger abandoned mine land projects. When ongoing abandoned mine land reclamation projects attract local news coverage, MLRP personnel take the opportunity to explain the activities and importance of the State’s Abandoned Mine Land (AML) Program by participating in press interviews.

Missouri maintains internal systems to track AML contract obligations and expenditures, public inquiries and project ranking data. Every year, hundreds of contacts are made with the public, other state and federal agencies, industry officials, and landowners of abandoned mine lands.

The MLRP also provides landowners and the public in general the full extent of public participation in its permitting and bond release processes as provided by the state regulations.

OSM’s Alton Field Division (AFD) has a website located at www.merc.osmre.gov/MCR/FO/AFD.shtm containing information for public use. The public can access OSM annual reports, Performance Agreements (PA’s), and cooperative agreements via the internet. It also has a link to the MLRP website which contains MLRP contact information, Missouri’s statute and regulations, and other information about the program.

IV. Major Accomplishments/Issues/Innovations in the Missouri Program

Abandoned Mine Land Program

OSM awarded Missouri's Title IV grant for fiscal year 2007 in the amount of \$1,550,000, fiscal year 2008 grant in the amount of \$1,830,731, and the fiscal year 2009 AML grant in the amount of \$1,857,121. During evaluation year (EY) 2010, the MLRP accomplished the following:

- The DeSoto Shafts AML Reclamation Project was completed on October 28, 2009, at a cost of \$113,000.00. The AML staff developed the design and awarded this contract to close 16 underground mine openings near DeSoto in Jefferson County. These shafts are located on private property and posed a significant safety hazard to the public, as they range from 30 to 150 feet deep. The project consisted of closing access to fifteen (15) vertical shafts and one (1) horizontal adit. Several of the vertical shafts were sealed by constructing a four-foot thick concrete plug over the backfilled shaft. The remaining vertical mine shafts were sealed with polyurethane foam plugs that ranged from nine (9) to seventeen (17) feet thick, depending upon the dimensions of the shaft opening. The concrete and polyurethane plugs were then back-filled with dirt and all of the sealed vertical shafts were identified by a steel monument that is cast in a concrete filled PVC pipe. Access to the horizontal adit was closed through construction of a bat gate. This steel gate will not permit human or large animal entrance into the shaft, but will allow bats to fly in and out of the shaft. In recent years, due to urbanization, bat habitat has become very limited and good quality habitat is critical for bats.



TYPICAL SHAFT



BAT GATE

- The ABC Shaft Closure Project was completed on January 28, 2010. This project closed an extremely dangerous lead/ zinc mine shaft located in the loading area of ABC Supply Co., Inc. in Joplin. The reclamation included excavating the opening to expose the shaft and then pouring a steel-reinforced concrete plug to seal the dangerous vertical opening. The final cost of reclamation was \$9,450.00.
- On June 18, 2009, a construction contract for the West Montrose Reclamation Project was awarded in the amount of \$735,615.00. The AML staff developed the design and awarded this contract to reclaim approximately 60 acres of barren and eroding mine spoils located in the Germantown Problem Area, in southwest Missouri. This project includes the reclamation of 1100 feet of dangerous highwall, thirty six acres of dangerous piles and embankments, and elimination of three polluted agricultural ponds. It also addresses the most dangerous features of a hazardous water body. During this evaluation year, the site was graded to eliminate dangerous piles and embankments and to mitigate the dangerous highwall through backfill. Approximately 60 acres of barren and eroding mine spoil were graded and treated with lime in preparation of directly revegetating the site with a temporary green cover crop. The original contract completion date was set for March 11, 2010, however the contract was extended due to bad weather days. At the end of the evaluation period, the site was at final grade and the contractor was working to seed the site.



WEST MONTROSE RECLAMATION PROJECT

- On March 3, 2009, a construction contract for the Bee Hollow Reclamation Project was awarded in the amount of \$212,000.00. The AML staff developed the design and awarded this contract to cover a barren bench of coal and reclaim approximately 8 acres of abandoned mine lands. This project included the reclamation of 1100 feet of dangerous highwall, 2.2 acres of dangerous piles and embankments, two waste dumps and a 2-acre coal bench. During this evaluation year, the abandoned surface mine was graded to eliminate dangerous piles and embankments and to cover the exposed coal and wastes with suitable cover material. Additionally, 1100 feet of guardrail was installed to mitigate the hazards of a dangerous highwall. The approximate 8-acre site was graded and treated with lime in preparation of directly revegetating the site with a temporary green cover crop. The original contract completion was set for June 11, 2010, however the contract was extended due to bad weather days. At the end of the evaluation period, the site was at final grade and the contractor was working to seed the site.



BEE HOLLOW RECLAMATION PROJECT

- During this evaluation year, Gredell Engineering Resources, Inc., of Jefferson City, MO had completed the final design for the Harrisburg Reclamation Project. The AML staff completed a final review of the design/ specifications and recommended the consultant submit the plans to the Missouri Office of Administration for contract and bidding. The final project design will reclaim approximately 75 acres associated with six areas of abandoned strip mine lands located near Harrisburg, Missouri. The scope of work for this project includes excavating and burying coal waste, grading and re-contouring the areas to eliminate spoil piles and embankments, eliminating acid pit impoundments, mitigating acid mine seeps, and revegetating the site to reduce erosion. The final cost estimate of construction is \$1,406,885.
- The AML staff worked on the planning and design for the Highland Highwall Reclamation Project, located near Calhoun, Missouri in Henry County, Missouri. Work at this site will address approximately 70 acres of pre-law coal mine land where reclamation was left incomplete by the mining company. Reclamation of this site will eliminate an extremely dangerous highwall that is located immediately adjacent to a county gravel road. Additionally, dangerous piles and embankments will be graded and revegetated to control erosion.
- The AML staff has completed the initial site investigations and preliminary design of the Montrose Badlands Reclamation Project, located near Montrose, Missouri. Staff has initiated the planning and detailed design of the project. Work at this site will address an estimated 35 acres of abandoned coal mine land. Reclamation will eliminate an extremely dangerous highwall that is located immediately adjacent to a county gravel road. Additionally, dangerous piles and embankments will be graded and clogged stream lands will be mitigated. Upon completion, the site will be revegetated to control erosion.

Since the program was first fully approved in 1982, Missouri has reclaimed 73,702 feet of dangerous highwalls, 37 portals, 221 vertical mine openings, approximately 6.0 acres of subsidence, 54 instances of polluted water, 1,603 acres that were contributing to 10.8 miles of clogged streams, 668 acres of dangerous piles and embankments, 217 acres of coal waste, and 1,390 acres of mine spoils.

Regulatory Program

The MLRP processed and approved bond release requests for the active coal mining industry during the evaluation year. This amounted to full phase III bond release on 656.0 acres covered by two permanent program permits and resulted in the removal of two inspectable units (IU) from the State's inspection responsibilities. These were Continental Coal Company's "Panther Creek Mine" located in Bates county and the former Midwest Coal Company's "Tiger Mine" also located in Bates county. The "Tiger Mine" was fully reclaimed and ushered through the bond release process by the surety company which initially underwrote Midwest Coal Company.

This final release process for both of these former mine sites involved the analysis of data relating to final soil productivity testing at each mine as well as the preparation of a Post Mining Hydrologic Assessment (PHA) by the program's staff hydrologist. Both mine sites have now been fully returned to private ownership.



A view of one of several water impoundments surrounded by pasture and wildlife plantings at Continental Coal Company's Panther Creek mine in Bates county. This mine is now fully reclaimed and released.



A view of a large final water impoundment located at the former Midwest Coal "Tiger" mine in Bates County. This reclamation was completed by the surety company in lieu of bond forfeiture. The surety completed all of the required regulatory processes for final Phase III bond release during the second half of the decade.

In addition to the two units removed from the Inspectable Units list via bond release, three other units were also removed from the list by combining four of the units at Associated Electric Cooperative, Inc., Prairie Hill mine into one Inspectable Unit. When this mine was active, nearly 12,000 acres were under bond. As reclamation has proceeded and bond has been released, the number of bonded acres has gradually been reduced to less than 1,000 acres, making the remaining acreage a manageable size for inspecting as one unit. This practical change will save the MLRP both time and expenditures until all phase III bond is released at the mine site.

Missouri is continuing to address the outstanding program amendments to its existing State regulations. The program has recently hired a new employee within the administrative unit who will be the lead coordinator for the program's rulemaking efforts. Currently, there are three rulemaking "packages" that will be codified into formal regulations. The amendments will proceed through the State's system of rule promulgation that requires many individual steps in order to finally codify them into state regulation. The entire process usually takes no less than 18 months. With this in mind, the State expects to codify the amendments during mid to late 2011.

Although hampered by unusually wet weather in evaluation year EY 2010, MLRP's forfeiture reclamation efforts have continued. During EY 2010, reclamation liability was released on 280.0 interim program permit acres. The MLRC has released over 4,600 acres of forfeited land from reclamation liability over the last five evaluation years. Forfeiture reclamation liability release was achieved on only 825 acres during evaluation years EY 2001 through EY 2005, when liability release averaged only 165 acres each year.

Missouri intends to continue its aggressive approach to the issue of bond forfeited lands and to continue returning these lands to private ownership during the coming evaluation year.

In January of 2009, the MLRP experienced the loss of its Staff Director. This was due to a change in the state's administration with the inauguration of a new governor who dismissed the MLRP's Staff Director. At the beginning of EY 2010, a new director was selected by the Missouri Department of Natural Resources for the MLRP. In addition to this vacancy being filled there were also three other vacancies filled in the two coal units of the program. At the end of the evaluation year, all vacancies within the MLRP were filled with new staff members. Training for these new staff members will be a priority for the MLRP during the next evaluation year.

Missouri operators have received the following national reclamation awards:

Year of Award	Awarded by	Company	Mine
EY 2007	IMCC*	Associated Electric Cooperative, Inc.	BeeVeer
EY 2008	OSM	Associated Electric Cooperative, Inc.	BeeVeer

*Interstate Mining Compact Commission

V. Success in Achieving the Purposes of SMCRA as Determined by Measuring and Reporting End Results

To further the concept of reporting end results under Title V of SMCRA, the findings from performance standard and public participation evaluations are being collected for a national perspective in terms of the number and extent of observed off-site impacts, the number and percentage of IU's free of off-site impacts, the number of acres that have been mined and reclaimed and which meet the bond release requirements and have been released for the various phases of reclamation, and the effectiveness of customer service provided by the State.

The overall measure of excellence in the AML Program is the degree to which States are successful in achieving reclamation goals. One of the primary goals of AML topical reviews, referred to as Enhancement and Performance Reviews, is to improve upon this success. These reviews document each State's ability to achieve desired outcomes. Emphasizing outcomes allows OSM to justify when the end result is not

being achieved and establish a basis for reaching agreement with (and providing assistance to) a State to improve its program.

Individual topic reports that provide additional details on how the following evaluations and measurements were conducted are available at the MCR office in Alton, Illinois.

A. Off-Site Impacts

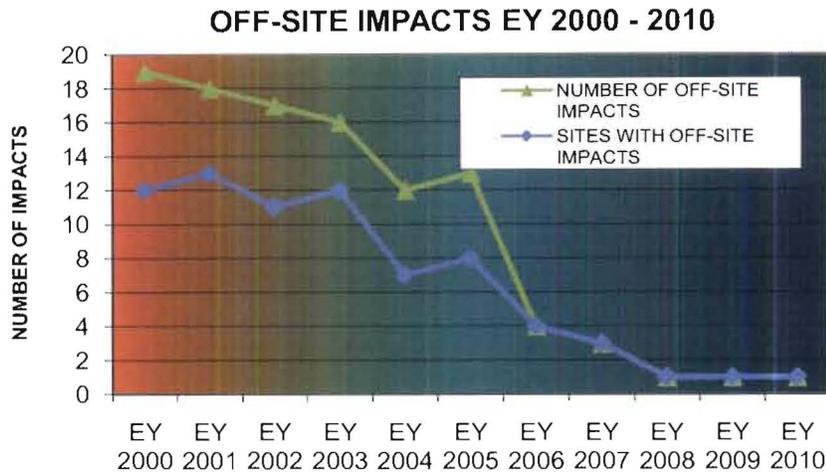
Pursuant to Directive REG-8, revised December 21, 2006, OSM annually evaluates and reports on the effectiveness of the MLRP's Regulatory Program in protecting the environment and the public from off-site impacts resulting from coal mining activities and reclamation operations. Off-site impact data are a measurement of the State's on-the-ground success in preventing or minimizing off-site impacts. The goal, however, is for each IU to have no off-site impacts.

An off-site impact is defined as anything resulting from a surface coal mining and reclamation activity or operation that causes a negative effect on resources (people, land, water, structures). The applicable State program must regulate or control the mining or reclamation activity or result of the activity causing an off-site impact. In addition, the impact on the resource must be substantiated as being related to a mining and reclamation activity and must be outside the area authorized by the permit for conducting mining and reclamation activities.

To determine the number of off-site impacts in the state, OSM conducted a total of 31 oversight inspections in Missouri and reviewed State inspection and enforcement files to identify any off-site impacts observed by the MLRP. One off-site impact was observed at one of the 16 inspectable units that composed Missouri's Inspectable Units list at the end of the evaluation year. This off-site impact, characterized as hydrologic with a moderate effect on water resources, was previously identified during a joint inspection conducted on April 26, 2006.

As a result, one off-site impact was identified at one of the 16 IUs, including nine bond forfeiture and 7 active units, which composed Missouri's IU list at the end of the evaluation year. As shown in Table 4, all 7 active units in Missouri were free of off-site impacts during the evaluation period.

The percentage of inspectable units free of off-site impacts slightly decreased from 95.2 percent in EY 2009 to 93.8 percent in EY 2010, even though only one off-site impact was observed in both EY 2009 and EY 2010. This small change resulted because there were 21 inspectable units in Missouri in EY 2009 but only 16 inspectable units in 2010.



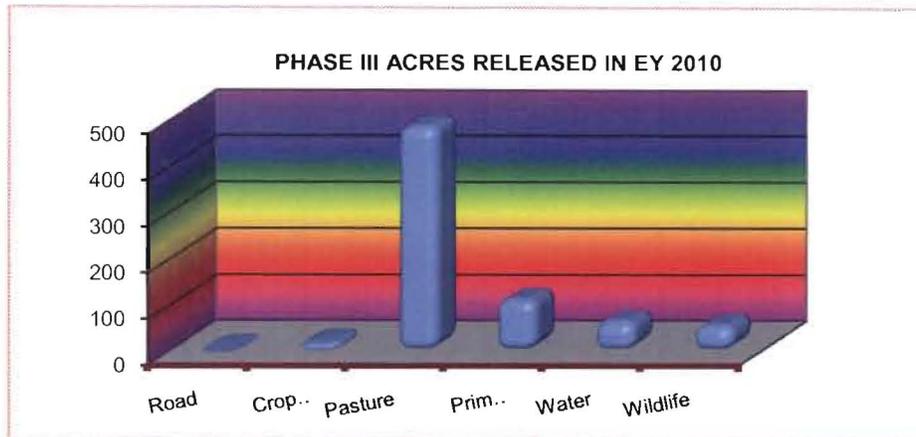
The objective of this measurement is that the MLRP and OSM direct efforts to decrease the occurrence of off-site impacts. Both the State and OSM are working to achieve this objective, and it is addressed in OSM's PA with the State. Timely forfeiture reclamation will eliminate the off-site impact identified in EY 2010 and prevent new impacts from occurring.

B. Reclamation Success

The MLRP released phase I bond on 3.0 acres, phase II bond on 656.0 acres and phase III bond on 729.2 acres during EY 2010. Acreage figures for the post-mining land uses of the land released from phase III bond were as follows: 483.8 acres of pasture, 110.0 acres of prime farmland, 62.4 acres of water, 53.8 acres of wildlife habitat, 18.0 acres of cropland, and 1.2 acres of road. These releases accounted for removal of two permanent program permits and two inspectable units from Missouri's IU list. Additional acreage was not bonded in EY 2010.

OSM conducted a joint bond release inspection at one of the units where bond was released in EY 2010. Based on field observations and review of documentation contained in the bond release request file, OSM determined that the bond release applicant met the performance standards for each phase of bond being requested for release, and the State appropriately released the bond as requested.

At the end of EY 2010, 3,517.8 acres remained under phase III bond in Missouri. Fifty acres were between phase I bond release and phase II bond release and 10.0 acres were between phase II bond release and phase III bond release.



There was no re-mining activity in Missouri in EY 2009. Also, none of the mine sites in Missouri have impoundments that qualify as Mine Safety and Health Administration impoundments.

C. Customer Service

1. Applicant Violator System (AVS) Usage and Implementation

This AFD oversight review was conducted to evaluate the MLRP's implementation and use of the AVS. The purpose of the AVS is to prevent approval of issuance of coal mining permits to operations with outstanding violations. Based on review results, the AFD concluded that even though the MLRP did not meet the recommended time frames for completing AVS actions on two occasions, the State is fulfilling the purpose of the AVS by entering all permit actions into the AVS. The AFD recommended that all MLRP employees who currently have AVS responsibilities attend AVS training at the first available opportunity.

2. Citizen Complaints

The purpose of this evaluation was to determine the effectiveness of the State program in providing customer service to the public during citizen complaint investigations. Review of the State's citizen complaint files revealed that the MLRP has not received any citizen complaints since February 1, 2006, when the State reassumed full Regulatory Title V primacy. The AFD will include a provision in the EY 2011-2012 PA with Missouri to conduct this evaluation when the MLRP receives a complaint and conducts a citizen's complaint investigation.

D. National Priority Review Topics

On June 11, 2009, the Department of Interior (DOI) entered into a Memorandum of Understanding (MOU) with the Environmental Protection Agency and the Army Corps of Engineers to reduce the harmful environmental impacts of coal mining in six states in central Appalachia. Under the MOU, the DOI committed to re-evaluate and

determine how the Department will more effectively conduct oversight of state agencies in regulating coal mining and their permitting, enforcement, and regulatory activities under the SMCRA; issue guidance concerning appropriate application of the stream buffer zone rule; and remove impediments to OSM's ability to require correction of defects found in state issued permits. As part of OSM's efforts in meeting these commitments, OSM's Acting Director selected two national priority oversight review topics to be reviewed in all states with approved Title V programs. These two topics were Approximate Original Contour and State Calculation of Performance Bond Amounts.

1. Approximate Original Contour

The AFD conducted permit file reviews of the two actively producing mines in Missouri, and followed up with field verification at one of the mines. Review findings were that the MLRP is successfully implementing its program requirements for approximate original contour and both of the mining operations were found to be achieving approximate original contour following reclamation of land disturbed by mining activities. As required by Directive REG-8, Appendix 1, the AFD should obtain an official concurrence with the MLRP on an accepted interpretation of approximate original contour.

2. State Calculation of Performance Bond Amounts

The MCR's Program Support Division (PSD) found that the MLRP follows OSM's "Handbook for Calculation of Reclamation Bond Amounts" (Directive TSR-1) to calculate required bond amount. In addition each operator is required to submit a detailed reclamation cost estimate. In the event that the operator's cost estimate is higher than the State's, the State has the option to accept the operator's cost estimate as the required bond amount. The MLRP's method of determining bond amounts for permits and permit revisions ensures that sufficient funds are available for completion of the reclamation plan by a third party in the event of bond forfeiture at the point of maximum reclamation liability during the term of the permit. The MLRP is re-evaluating bond amounts and, if necessary, requiring adjustment of the bond amount each time a permit is significantly revised or renewed. In Missouri, there have been no instances of unanticipated long-term post-mining polluttional discharges that developed after permit approval; however, the MLRP does not have a method to adjust bond amounts or provide financial assurance to cover the costs of treating such discharges.

VI. OSM Assistance

OSM provides technical assistance and technology support to State AML and Regulatory Programs at the individual State level on project specific efforts, and at the national level in the form of national meetings, forums and national initiatives. The MCR's PSD provides direct technical assistance in project and problem investigation, design and analysis, permitting assistance, developing technical guidelines and training and support. The MCR works with the national Technical Innovation and Professional

Services Program to deliver state-of-the-art computer hardware, software, training and systems support for Missouri's AML and Regulatory Programs. MCR also works on the development of regional and national forums, meetings and initiatives to ensure that interests and needs of individual States are considered and included in these events. MCR initiated a regional Technology Transfer Team in 2004 on which each State, including Missouri, has a representative.

During EY 2010, OSM provided Missouri with the following assistance:

Title IV Assistance

The Bee Veer AML site was originally constructed as a wetland acid mine drainage treatment project in 1991. In 1999, a second AML project was developed to address problems with the initial project. Subsequently, there has been additional system failures, primarily relating to a persistent erosion problem described as a "wash hole." Missouri requested technical assistance from OSM to address this problem. PSD staff visited the site in April 2010 and plans are to conduct surveying and site evaluation activities later this summer. Engineering plans will be prepared and provided to the State for its use in repairing the "wash hole", and additional design work may be conducted to rehabilitate the treatment system.

PSD staff provided technical assistance to the MLRP by investigating an abandoned mine shaft in De Soto, Missouri on September 9, 2009. The MCR's borehole camera was used to document existing conditions in the shaft in preparation for closure activities.

On April 26, 2010 a PSD staff member traveled to St. Clair, Missouri to assist the MLRP in investigating an abandoned mine shaft. The MCR borehole video system was successfully used to document existing conditions in the shaft. Information obtained from the video survey will be used to plan the most efficient and cost effective plan for shaft closure.

Title V Assistance

A PSD staff member provided assistance to the MLRP on October 20, 2009, by investigating the condition of a sediment basin drop-down outlet pipe at a bond forfeiture site near Harrisburg, Missouri. The MCR's borehole camera system was used in this investigation which verified the pipe had failed in several locations.

In partial fulfillment of the EY 2010 Performance Agreement with Missouri, a MCR hydrologist reviewed the draft PHA, dated October 30, 2009, for Continental Coal's Panther Creek Mine. While the MCR hydrologist noted a number of items that could be changed in the document and discussed these with the MLRP hydrologist in a telephone conversation on November 9, 2009, the PHA was found to have been adequately prepared and the report's conclusions logically followed from the analysis of the water-monitoring record.

VII. General Oversight Topic Reviews

Field Office Oversight Inspection Activity

During EY 2010, the IAO conducted oversight inspections in Missouri to evaluate the effectiveness of the State’s program in implementing its rules and regulations that specifically target the performance standards required of the mining operations. Information gathered from these inspections indicates how well state programs are ensuring environmental protection, reclamation success, and prevention of off-site impacts. As part of its implementation of the MOU between the Environmental Protection Agency, the Army Corps of Engineers, and DOI, OSM determined that it would increase inspections as one way to conduct more effective oversight. In EY 2010 the AFD determined the target number of inspections to conduct based upon the preceding five year average of the number of inspections that it had conducted in Missouri. It was determined that the five year average represents a reasonable number of inspections to conduct based upon available resources within the AFD. The findings for the oversight inspections conducted can be found in Section V – Successes in Achieving the Purposes of SMCRA.

The following table indicates the numbers and types of inspections conducted by the AFD for the past two evaluation years.

AFD Increased Oversight Inspection Activity

# EY 2009 Inspections Conducted	EY 2010 Inspection Target #	# EY 2010 Inspections Conducted	% Target Inspections Completed
9	24	31	129%

During EY 2010, the AFD conducted the following inspections in Missouri.

Complete	Partial	Random	Focused	Joint	Non-joint	Independent
13	18	0	31	17	14	1

In comparison to the previous evaluation year, the AFD conducted an additional 22 inspections in Missouri in 2010. This represents a 244 percent increase in inspections in Missouri. During the increased inspection activity, the oversight inspectors made the following general observations: (1) no change in the number of on the ground violations and general violations during an AFD oversight inspection; and (2) no change in the number of identified off site impacts. No significant conclusions can be drawn from this EY’s increased inspections relating to whether OSM’s policy of increased oversight inspections has improved the environment or improved the effectiveness of the State program.

Over the last ten years, the number of inspectable units in Missouri has steadily declined. Fifty-eight inspectable units were on the inspectable units list at the beginning of EY 2001. At the end of EY 2010, only 16 inspectable units remained on the list and only two mines were producing coal. The MLRP expects this downward trend to continue for the foreseeable future. Most reclamation has been completed at mines where production has ceased, and the MLRP anticipates the majority of reclamation work at forfeiture sites will be completed within the next two to three years. The AFD intends to continue its increased inspection rate in Missouri in EY 2011; however, the number of OSM oversight inspections conducted in Missouri will naturally decline as reclaimed land is released from bond or forfeiture liability.

The following oversight topics were reviewed during EY 2010. The detailed finding reports are available at the MCR office in Alton, Illinois.

A. Bond Forfeiture Reclamation

(This topic is included in the EY 2010 Reclamation Success Report) OSM has been concerned about the backlog of reclamation that needs to be accomplished at bond forfeiture sites in Missouri. In order to address this situation the MLRP established a Coal Bond Forfeiture Release Schedule in EY 2006, last revised on December 9, 2009, to prioritize the forfeiture reclamation work planned for several evaluation years. The schedule was very aggressive, outlining work to be performed at 17 sites on over 30 permit areas. The MLRC released reclamation liability on 21 permits covering 4,335 acres at bond forfeiture sites during the period EY 2006 through EY 2008. Although forfeiture reclamation work has been severely hampered by unusually wet weather conditions the last three evaluation years, the MLRC was able to release reclamation liability on 280.0 interim program acres in EY 2010. The AFD conducted fourteen joint inspections at forfeiture sites this year and determined that nearly all of the remaining required reclamation is associated with repair of gully erosion and replacement of pond outlet pipes.

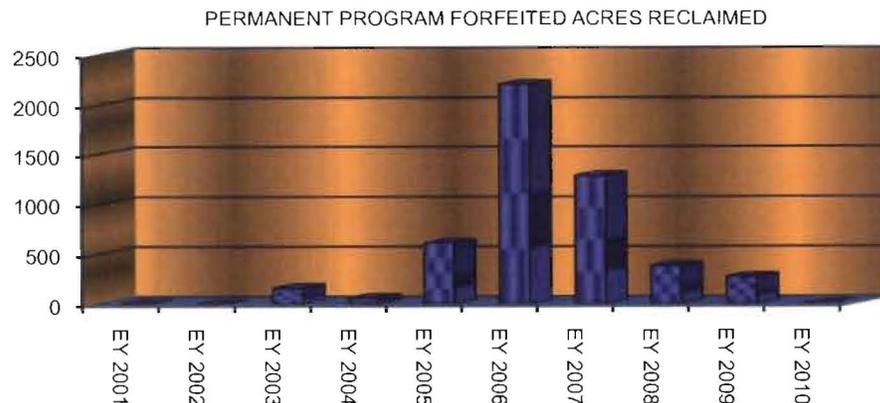
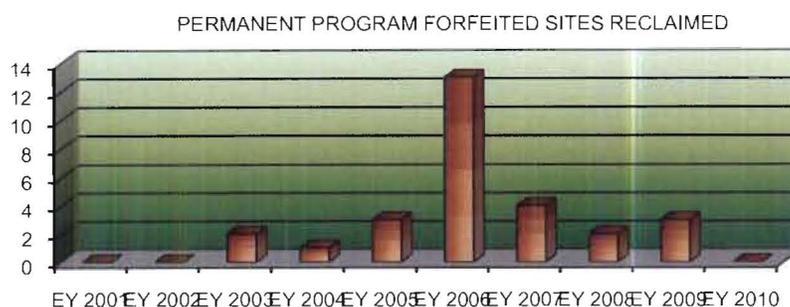


Table 6 of this report exhibits information concerning reclamation at forfeiture sites and surety reclamation sites in EY 2010.



B. Abandoned Mine Land Reclamation Program Amendment Processing

The final 2006 Title IV amendments were published on November 14, 2008. When this work element was included in the EY 2010 Performance Agreement, OSM anticipated that a clear understanding of how to proceed with amendments to state AML Program Plans would exist, and Part 884 notifications would have been issued to the States/Tribes. Although training at both the Federal and state levels has been conducted by OSM, Part 884 notifications were not issued by the end of EY 2010; therefore, this oversight assistance effort will be carried forward and conducted at the appropriate time.

C. Abandoned Mine Land Inventory System (AMLIS) Certification and Data Accuracy

Guided by OSM's Directive AML-1, entitled "Abandoned Mine Land Inventory", and Inspector General's Audit Report No. 2003-I-0074, the AFD conducted an evaluation of the effectiveness of the MLRP in ensuring accuracy of data in the AMLIS. The AFD first reviewed the certified procedures the MLRP AML Program has in place to ensure accuracy. Secondly, to verify accuracy, the AFD reviewed a random sample of Problem Area Descriptions forms with the date of the last update on or after October 1, 2005. OSM concluded that the MLRP's current process and procedures are effective to ensure accuracy of AMLIS data entries.

D. Implications of Residential Development Occurring on or Near Un-reclaimed Mine Lands In Missouri

The purpose of this review was to examine the implications of residential and other development on un-reclaimed abandoned mine problem areas, and to determine a prudent course of action. Public development on problem areas is not currently considered to be a major problem in Missouri, although such encroachment does appear to be happening more frequently than in the past. The MLRP/AFD staff decided to develop an educational outreach brochure that explains the problems and hidden dangers that may result when un-reclaimed mine lands are developed for public

or private use. The AFD is developing the brochure and plans to have it completed in time for printing in September 2010.

APPENDIX 1 – Tabular Summary of Core Data to Characterize the Program

These tables present data pertinent to mining operations and State and Federal regulatory activities within Missouri. They also summarize funding provided by OSM and Missouri staffing. Unless otherwise specified, the reporting period for the data contained in all tables is the same as the evaluation year. Additional data used by OSM in its evaluation of Missouri's performance is available for review in the evaluation files maintained by the MCR office in Alton, Illinois.

When OSM's Directive REG-8, Oversight of State Programs, was revised in December 2006, the reporting period for coal production on Table 1 was changed from a calendar year basis to an evaluation year basis. The change was effective for the 2007 evaluation year. However, with Change Notice REG-8, effective July 1, 2008, the calendar year reporting period in Table 1 for coal produced for sale, transfer or use was reestablished and is effective for the 2010 evaluation year. In addition, for the 2008 evaluation report, coal production for the two prior years reported on Table 1 was recalculated on a calendar year basis so that all three years of production reported in the table are directly comparable. The difference in reporting periods should be noted when attempting to compare coal production figures from annual evaluation reports originating both before and after the December 2006 revision to the reporting period.

TABLE 1 – COAL PRODUCTION

TABLE 2 – INSPECTABLE UNITS

TABLE 3 – STATE PERMITTING ACTIVITY

TABLE 4 – OFF-SITE IMPACTS

TABLE 5 – ANNUAL STATE MINING AND RECLAMATION RESULTS

TABLE 6 – STATE BOND FORFEITURE ACTIVITY

TABLE 7 – MISSOURI STAFFING

TABLE 8 – FUNDS GRANTED TO MISSOURI BY OSM

TABLE 9 – STATE INSPECTION ACTIVITY

TABLE 10 – ENFORCEMENT ACTIVITY

TABLE 11 – LANDS UNSUITABLE ACTIVITY

TABLE 12 – POST-MINING LAND USE ACREAGE

TABLE 1			
Coal Produced for Sale, Transfer, or Use (Millions of Short Tons)			
Period	Surface Mines	Underground Mines	Total
Coal production ^A for entire state:			
Calendar Year			
CY 2007	0.236	0.000	0.236
CY 2008	0.262	0.000	0.262
CY 2009	0.450	0.000	0.450
<p>Coal production as shown in this table is the gross tonnage and includes coal produced during the calendar year (CY) for sale, transfer or use. The coal produced in each CY quarter is reported to OSM during the following quarter by each mining company on line 8 (a) of form OSM-1, "Coal Reclamation Fee Report." Gross tonnage does not provide for a moisture reduction. OSM verifies tonnage reported through routine auditing of mining companies. This production may vary from that reported by States or other sources due to varying methods of determining and reporting coal production.</p> <p>^A Provide production information for the latest three full calendar years to include the last full calendar year for which data is available.</p>			

TABLE 2

Inspectable Units
As of June 30, 2010

Coal mines and related facilities	Number and Status of Permits								Nbr. of Insp. Units ^A	Permitted Acreage ^B (100's of acres)				
	Active or temporarily inactive		Inactive Phase II bond release		Abandoned		Totals			Federal Lands		State/Private Lands		All Lands
	IP	PP	IP	PP	IP	PP	IP	PP		IP	PP	IP	PP	
LANDS FOR WHICH THE STATE IS THE REGULATORY AUTHORITY														
Surface mines	0	15	0	0	6	12	6	27	16	0.0	0.0	2.2	48.2	50.4
Underground mines	0	0	0	0	0	0	0	0	0	0.0	0.0	0.0	0.0	0.0
Other facilities	0	0	0	0	0	0	0	0	0	0.0	0.0	0.0	0.0	0.0
Total	0	15	0	0	6	12	6	27	16	0.0	0.0	2.2	48.2	50.4
Total number of permits:											33			
Average number of permits per inspectable unit (excluding exploration sites):											2.06			
Average number of acres per inspectable unit (excluding exploration sites):											315.00			
Number of exploration permits on State and private lands:									2	On Federal lands ^C :		0		
Number of exploration notices on State and private lands:									0	On Federal lands ^C :		0		
<p>IP: Initial regulatory program sites PP: Permanent regulatory program sites</p> <p>^A Inspectable units include multiple permits that have been grouped together as one unit for inspection frequency purposes by some State programs.</p> <p>^B When a single inspectable unit contains both Federal lands and State/Private lands, enter the permitted acreage for each land type in the appropriate category.</p> <p>^C Includes only exploration activities regulated by the State pursuant to a cooperative agreement with OSM or by OSM pursuant to a Federal lands program. Excludes exploration regulated by the Bureau of Land Management.</p>														

TABLE 3

State Permitting Activity
As of June 30, 2010

Type of Application	Surface mines			Underground mines			Other facilities			Totals		
	App. Rec.	Issued	Acres	App. Rec.	Issued	Acres ^A	App. Rec.	Issued	Acres	App. Rec.	Issued	Acres
New Permits	0	0	0	0	0	0	0	0	0	0	0	0
Renewals	0	0		0	0		0	0		0	0	
Transfers, sales, and assignments of permit rights	0	0		0	0		0	0		0	0	
Small operator assistance	0	0		0	0		0	0		0	0	
Exploration permits										1	1	
Exploration notices ^B											0	
Revisions (exclusive of incidental boundary revisions)		5			0			0			5	
Revisions (adding acreage but are not incidental boundary revisions)	0	0	0	0	0	0	0	0	0	0	0	0
Incidental boundary revisions	0	0	0	0	0	0	0	0	0	0	0	0
Totals	0	5	0	0	0	0	0	0	0	1	6	0
OPTIONAL - Number of midterm permit reviews completed that are not reported as revisions:											0	
^A includes only the number of acres of proposed surface disturbance.												
^B State approval not required. Involves removal of less than 250 tons of coal and does not affect lands designated unsuitable for mining.												

TABLE 4

OFF-SITE IMPACTS (excluding bond forfeiture sites)

RESOURCES AFFECTED		People			Land			Water			Structures		
DEGREE OF IMPACT		Minor	Moderate	Major	Minor	Moderate	Major	Minor	Moderate	Major	Minor	Moderate	Major
TYPE OF IMPACT AND TOTAL NUMBER OF EACH TYPE	Blasting	0	0	0	0	0	0	0	0	0	0	0	0
	Land Stability	0	0	0	0	0	0	0	0	0	0	0	0
	Hydrology	0	0	0	0	0	0	0	0	0	0	0	0
	Encroachment	0	0	0	0	0	0	0	0	0	0	0	0
	Other	0	0	0	0	0	0	0	0	0	0	0	0
	Total	0	0	0	0	0	0	0	0	0	0	0	0

Total number of inspectable units (excluding bond forfeiture sites): 7

Inspectable units free of off-site impacts: 7

Inspectable units with off-site impacts: 0

OFF-SITE IMPACTS ON BOND FORFEITURE SITES

RESOURCES AFFECTED		People			Land			Water			Structures		
DEGREE OF IMPACT		Minor	Moderate	Major	Minor	Moderate	Major	Minor	Moderate	Major	Minor	Moderate	Major
TYPE OF IMPACT AND TOTAL NUMBER OF EACH TYPE	Blasting	0	0	0	0	0	0	0	0	0	0	0	0
	Land Stability	0	0	0	0	0	0	0	0	0	0	0	0
	Hydrology	1	0	0	0	0	0	0	1	0	0	0	0
	Encroachment	0	0	0	0	0	0	0	0	0	0	0	0
	Other	0	0	0	0	0	0	0	0	0	0	0	0
	Total	1	0	0	0	0	0	0	1	0	0	0	0

Total number of inspectable units (only bond forfeiture sites): 9

Inspectable units free of off-site impacts: 8

Inspectable units with off-site impacts: 1

TABLE 5
Annual State Mining and Reclamation Results

Bond release phase	Applicable performance standard	During this Evaluation Year		
		Total acreage released	Acreage also released under Phase I	Acreage also released under Phase II
A	B	C	D	E
Phase I	- Approximate original contour restored - Topsoil or approved alternative replaced	3		
Phase II	- Surface stability - Establishment of vegetation	656	0	
Phase III	- Post-mining land use/productivity restored - Successful permanent vegetation - Groundwater recharge, quality and quantity restored - Surface water quality and quantity restored	729	3	656
Bonded Acreage ^A		Acres during this evaluation year		
Total number of new acres bonded during this evaluation year		0		
Number of acres bonded during this evaluation year that are considered remaining, if available		0		
Number of acres where bond was forfeited during this evaluation year		0		
Bonded Acreage Status		Cumulative Acres		
Total number of acres bonded as of the end of last review period (June 30, 2009) ^B		4,247		
Total number of acres bonded as of the end of this review period (June 30, 2010) ^B		3,518		
Sum of acres bonded that are between Phase I bond release and Phase II bond release as of June 30, 2010 ^B		50		
Sum of acres bonded that are between Phase II bond release and Phase III bond release as of June 30, 2010 ^B		10		
Disturbed Acreage		Acres		
Number of Acres Disturbed during this evaluation year		0		
Number of Acres Disturbed at the end of the evaluation year (cumulative)		0		
^A Bonded acreage is considered to approximate and represent the number of acres disturbed by surface coal mining and reclamation operations.				
^B Bonded acres in this category are those that have not received a Phase III or other final bond release (State maintains jurisdiction).				

Brief explanation of columns D & E. The States will enter the total acreage under each of the three phases (column C). The additional columns (D & E & E) will "break-out" the acreage among Phase II and/or Phase III. Bond release under Phase II can be a combination of Phase I and II acreage, and Phase III acreage can be a combination of Phase I, II, and III. See "Instructions for Completion of Specific Tables," Table 5 for example.

TABLE 6

State Bond Forfeiture Activity
(Permanent Program Permits)

Bond Forfeiture Reclamation Activity by SRA	Number of Sites	Dollars	Acres
Sites with bonds forfeited and collected that were unreclaimed as of June 30, 2009 (end of previous evaluation year) ^A	12		1,303
Sites with bonds forfeited and collected during Evaluation Year 2010 (current evaluation year)	0	\$ 0	0
Sites with bonds forfeited and collected that were re-permitted during Evaluation Year 2010 (current evaluation year)	0		0
Sites with bonds forfeited and collected that were reclaimed during Evaluation Year 2010 (current evaluation year)	0		0
Sites with bonds forfeited and collected that were unreclaimed as of June 30, 2010 (end of current evaluation year) ^A	12		1,303
Sites with bonds forfeited but uncollected as of June 30, 2010 (end of current evaluation year)	0		0
Surety/Other Reclamation (In Lieu of Forfeiture)			
Sites being reclaimed by surety/other party as of June 30, 2009 (end of previous evaluation year) ^B	1		371
Sites where surety/other party agreed to do reclamation during Evaluation Year 2010 (current evaluation year)	3		1,213
Sites being reclaimed by surety/other party that were re-permitted during Evaluation Year 2010 (current evaluation year)	0		0
Sites with reclamation completed by surety/other party during Evaluation Year 2010 (current evaluation year) ^C	1		371
Sites being reclaimed by surety/other party as of June 30, 2010 (current evaluation year) ^B	3		1,213
^A Includes data only for those forfeiture sites not fully reclaimed as of this date			
^B Includes all sites where surety or other party has agreed to complete reclamation and site is not fully reclaimed as of this date			
^C This number also is reported in Table 5 as Phase III bond release has been granted on these sites			

TABLE 7	
State Staffing (Full-time equivalents at end of evaluation year)	
Function	EY 2010
Regulatory Program	
Permit Review	1.60
Inspection	1.15
Other (administrative, fiscal, personnel, etc.)	1.55
Regulatory Program Total	4.30
AML Program Total	8.85
Total	13.15

TABLE 8		
Funds Granted To Missouri BY OSM (During the Current Evaluation Year) (Actual Dollars, Rounded to the Nearest Dollar)		
Type of Funding	Federal Funds Awarded During Current Evaluation Year	Federal Funding as a Percentage of Total Program Costs
Regulatory Funding		
Administration and Enforcement Grant	\$ 234,318	0.00 %
Other Regulatory Funding, if applicable	\$ 0	0.00 %
Subtotal	\$ 234,318	
Small Operator Assistance Program	\$ 0	100 %
Abandoned Mine Land Reclamation Funding ^A	\$ 1,857,121	100 %
Totals	\$ 2,091,439	
^A Includes funding for AML Grants, the Clean Streams Initiative and the Watershed Cooperative Agreement Program.		

TABLE 9

State Inspection Activity During Current Evaluation Year		
Inspectable Unit Status	Number of Inspections Conducted	
	Complete	Partial
Active ^A	33	32
Inactive ^A	0	0
Abandoned ^A	0	0
Total	42	32
Exploration	0	0

^A Use terms as defined by the approved State program.

TABLE 10		
State Enforcement Activity During Current Evaluation Year		
Type of Enforcement Action	Number of Actions ^A	Number of Violations ^A
Notice of Violation	0	0
Failure-to-Abate Cessation Order	0	0
Imminent Harm Cessation Order	0	0

^A Do not include those violations that were vacated.

TABLE 11		
Lands Unsuitable Activity		
During Current Evaluation Year		
	Number	Acreage
Number Petitions Received	0	
Number Petitions Accepted	0	
Number Petitions Rejected	0	
Number Decisions Declaring Lands Unsuitable	0	0
Number Decisions Denying Lands Unsuitable	0	0

TABLE 12 Optional	
Post Mining Land Use Acreage (after Phase III bond release)	
Land Use	Acreage Released during this Evaluation Year
Cropland	18
Pasture/Hayland	484
Grazing Land	0
Forest	0
Residential	0
Fish & Wildlife Habitat	54
Developed Water Resources	62
Public Utilities	0
Industrial/Commercial	0
Recreation	0
Other (please specify): Prime Farmland	110
Other (please specify): Road	1
Other (please specify):	0
Total	729

APPENDIX 2 – State Comments on the Report

No comments

Disposition of Comments

No changes were required