



1407 W. North Temple, STE 210  
Salt Lake City, UT 84116

March 14, 2019

Mr. Rob Piippo  
President and General Manager  
Westmoreland Kemmerer, Inc.  
6520 County Road 304  
Kemmerer, WY 83101

**Subject: Notification of Presence of CCR Constituents**

Dear Mr. Piippo:

This letter serves as an official notification<sup>1</sup> and provides a follow-up to our phone call today during which PacifiCorp informed Westmoreland Kemmerer Coal Holdings, LLC ("Westmoreland") that certain 'Appendix IV' Coal Combustion Residual (CCR) constituents exist in groundwater on Westmoreland's property located immediately south of PacifiCorp's Naughton Power Plant near Kemmerer, Wyoming (Lincoln County Deed #20171210000500).

As discussed on our call, PacifiCorp has been monitoring a series of groundwater wells at its Naughton Plant as required by the CCR Rule. The groundwater sampling and analysis have shown statistically significant levels of CCR constituents, namely lithium and selenium on Westmoreland's property. PacifiCorp is evaluating the source of the constituents, including analysis of potential impacts from Naughton's CCR units, neighboring properties, and native sources. Given PacifiCorp's knowledge of the area's sub-surface characteristics and hydrologic system configurations, PacifiCorp believes the constituents could have migrated from PacifiCorp's sub-surface into the sub-surface of Westmoreland's property.

If monitoring results show PacifiCorp impacted groundwater on Westmoreland property, including in areas with unusable native groundwater, PacifiCorp will be actively engaged in evaluation, correction, cleanup, and remediation of those impacts, as required by the CCR Rule. As part of our strict compliance with CCR Rule requirements, PacifiCorp will post this notification letter on PacifiCorp's CCR website and place it in the company's operating record. I look forward to our ongoing collaboration on this matter. Please contact me if you have any questions.

Regards,

A handwritten signature in blue ink, appearing to read "James Owen".

James Owen  
Director, Environmental Services  
PacifiCorp

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<sup>1</sup> See 40 CFR §257. 95(g); 105(h)(8); 107(h)(6).