

ALDEN RESOURCES, LLC.
AREA #6

**Corrective Action Plan (CAP)
Pond #103 Removal/Stabilization Plan**

Pursuant to your April 10, 2023 correspondence, an initial meeting with Alden Personnel on site (on or about April 12, 2023) and a field walk with you, Chris Pracheil, Jesse Robinson et.al (biologist) and myself (Michael Erp) on April 25, 2023, we are submitting this CAP Plan to outline the work that has been accomplished and is still ongoing regarding the non-compliance on NPDES permit #TN0070408 (SMCRA permit #3340).

As of Monday, May 1, 2023, pond #103 has been removed by grading the pond berm completely out down to or slightly below the pond bottom elevation. This material was graded back to the existing highwall to eliminate as much of the wall as practicable. A temporary silt fence was installed below the disturbance associated with the pond removal operation. OSM has approved a pond removal plan for this activity. In conjunction with the pond removal, a sump was constructed at or near the location of Section 95+00 of the MOM Map. This feature facilitated the removal of most of the seepage water that was flowing into the pond #103 and associated slide location thereby dewatering the top of the slide very significantly. As of this date a rock lined channel has been constructed through the slide location to an existing drain just above the beaver ponds below the slide. The next step for the Company will be to seed/revegetate the disturbed area associated with this pond removal. Such revegetation efforts will include either had seeding or hydro seeder application to bare areas within the toe of the slide area. This seeding effort will include some specialized “wetland” seed application at the very toe of the slide in a small zone between the slide toe and the “open water” features of the beaver pond. The goal of this effort is to promote development of wetland species in the fringe areas of the open water immediately below the slide. Other isolated areas within the slide and fringe area will be seeded with native species as approved in the OSM permit.

The efforts to provide biologic “lift” for the impacts of the slide material into the jurisdictional feature are being constructed at this time and are centered around the features discussed with Bonnie Craighead and Chris Pracheil (TDEC) on April 25, 2023.

First, the Company will construct rock lined channels to collect two distinct seepage areas located at about Section 95+00 to 97+00 on the MOM Map. This rock lined drain will likely “Y” at the top and then merge into one central drain and proceed down the reclamation backfill to an “off bench” drain that will direct the water to the natural flow course. Some fringe wetland plants have formed on the bench at this flow location and will be preserved to the extent practicable. This drainage feature will minimize erosion potential for these sustained flows in the backfill and may develop some wetland areas along the fringe over time. The “lift” values for these features are being developed by Jesse Robinson and will be submitted under separate cover. The Company is proceeding with the construction of these features based on our discussion with TDEC personnel and the need to complete this work while they have equipment on site and available for timely construction.

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Secondly, the Company has opted to attempt to create a rock flow line and re-vegetate to the extent possible and off site un-related slide that was the focus of our discussions with TDEC personnel on April 25, 2023. This is a very difficult undertaking and potentially hazardous to equipment operation. The Company intends to attempt to develop the old logging road for proximity access and dump rock into the drain for armoring of the flow line. This effort will be limited to what can be reached from the side and possibly a short segment from top to create a rock lined flow path down the slope to a small natural drain at the bottom. Equipment cannot be worked in the interior of the slide channel, but some access can be obtained by working on the side of the slide nearest the road. It should be understood that significant disturbance will be involved with access to this work and that all disturbances (including the interior of the slide area) will be seeded for revegetation effort. It was indicated by TDEC personnel that any lift here would be a great benefit and would “do no harm” for this feature. They indicated that this work along with previously mentioned rock drains would likely suffice for slide material impacts.