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March 25, 2014

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NPDES PROGRAMS BRANCH
EPA, REGION 5

Mr. Kevin M. Pierard, Chief
NPDES Programs Branch
U.S. EPA Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Re: Clean Water Act Section 308 Information Request
American Energy Corporation – Century Mine Bennoc Refuse Disposal Area
Docket No. V-W-14-308-06

Dear Mr. Pierard:

On behalf of American Energy Corporation, please accept this letter as our supplemental response to U.S. EPA's Clean Water Act Section 308 Information Request dated November 27, 2013. This supplemental response follows the company's letters dated December 3, December 10 and December 23, 2013, as well as our discussions on March 12, 2014. Through those discussions, we agreed to certain narrowing of U.S. EPA's request, as more specifically described below.

Recognizing that the information requested by U.S. EPA is also relevant to Ohio EPA, even more so given the state's primary permitting authority and responsibility, the company has elected to produce a complete set of the responsive materials for Ohio EPA, with the expectation and understanding that Ohio EPA, in turn, will produce an identical set for U.S. EPA. As Eric Nygaard has been the company's—and, to our knowledge, U.S. EPA's—principal point of contact on NPDES permit-related issues, we have forwarded the documents to him. We will continue to coordinate with both agencies to ensure timely receipt of these materials, and we will stand by to address any questions the agencies may have.

The package of responsive information that is forthcoming from Ohio EPA to U.S. EPA will contain the following documents and data, consistent with our discussion on March 12. With respect to Section III.1.A of U.S. EPA's request, we agreed to make available the last 3 years of data from the ODNR quarterly monitoring reports for monitoring locations CMD-2 and CMD-2A, as depicted on the maps previously submitted to U.S. EPA on December 23, 2013. These data are presented in the table that is Bates stamped 000001. With respect to Section III.1.B, U.S. EPA agreed that those maps satisfied the request. With respect to Section III.1.C, we agreed to make available the latitude and longitude coordinates for each of the monitoring locations listed above. These coordinates are included with the table that is Bates stamped 000001. With respect to Section III.1.D, we agreed to make available any existing analytical data, from the last 3 years, for Pond 001 and Pond 002. These data were originally reported on

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"Ohio EPA – Daily Discharge Monitoring Report – Form 4500," copies of which have been included for the period January 1, 2011 through January 31, 2014 in the series of Bates stamped documents 000002-000297. Please note that each form ends at "Page 8 of 13" since the remaining pages reflect data from an unrelated monitoring station that are not relevant to U.S. EPA's request.

We have provided responsive information to the extent maintained by and available to American Energy Corporation in the ordinary course. Our submission is made without waiver of any objections, defenses or other rights and should not be construed as an admission of any kind. Any inadvertent disclosure by American Energy Corporation of material protected by privilege is not intended, and should not be construed to constitute a waiver of such privilege. American Energy Corporation reserves the right to amend or supplement its response to provide additional relevant documents that later become known or available. American Energy Corporation is not waiving its right to object to authentication of the documents produced for the purpose of admissibility in any administrative or judicial proceeding.

American Energy Corporation's certification is provided as **Attachment 1**.

If you have any questions or require any additional information, please do not hesitate to contact me at (804) 697-1414.

Sincerely,

Brooks M. Smith

cc: Ms. Janet Pellegrini, U.S. EPA
Mr. Craig Butler, Ohio EPA
Mr. Eric Nygaard, Ohio EPA

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Attachment 1

Statement of Certification

I certify that the information contained in or accompanying this submission is true, accurate and complete.

As to the identified portion(s) of this submission for which I cannot personally verify its truth and accuracy, I certify as the company official having supervisory responsibility for the person(s) who, acting under my direct instructions, made the verification, that this information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

By: _____ (Signature)
Anthony C. Vcelka, II
Treasurer

Date: 3/25/14