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December 23, 2013

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:

As a follow-up to my letter dated December 10, I offer American Energy Corporation's initial response to EPA's information request. Our response consists of two maps depicting the proposed Bennoc refuse disposal area in relation to the SMCRA monitoring locations from which EPA has requested data. The first map presents the relevant excerpts from the map originally submitted to Ohio DNR as part of the SMCRA application for this project. The second map presents a zoomed-in view of the area in and around ponds 001/023 and 002/024. Please note that the quarterly sampling sites are marked with a hexagon. The ones without a hexagon are one-time sampling sites used for the SMCRA permit application.

We believe that these maps help to show why EPA's request is not reasonably tailored to assist EPA in determining whether Ohio EPA's proposed NPDES permit falls within the guidelines and requirements of the Clean Water Act. Once you have had an opportunity to review these maps, we agree with you that it would be useful to have a discussion in which we attempt to resolve any lingering confusion and avoid any unnecessary or unreasonable work on my client's part.

Sincerely,

Brooks M. Smith

cc: Mr. Paul Novak, Ohio EPA