Reclamation Program Overview

Wisconsin's Nonmetallic Mining Reclamation Program

- WCCA Meeting
- October 13, 2016
- Tom Portle WDNR

AGENDA

Nonmetallic Mining Reclamation program: history, need; regulatory structure

- Need for Reclamation Rule – mandated for County
- Uniform performance-based reclamation standards and administrative requirements
- Roles DNR and the NR 135 Regulatory Authority (RA)
- Zoning and Reclamation
- What we've learned and todays issues

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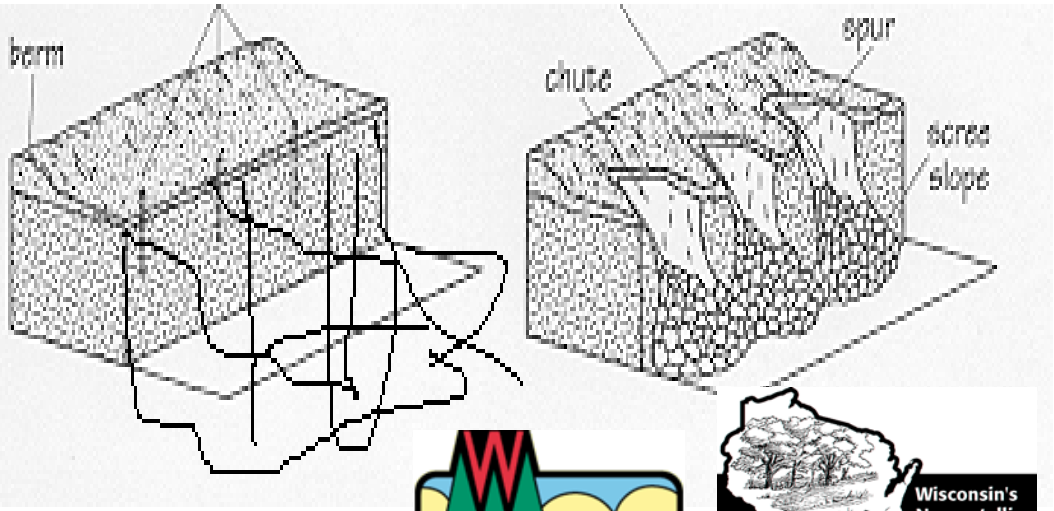
Highwalls
Safety & Stability

Nuisance or worse

Especially a problem on abandoned “pre-law” mines



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Abandoned mines

Magnet for illegal dumping of solid waste

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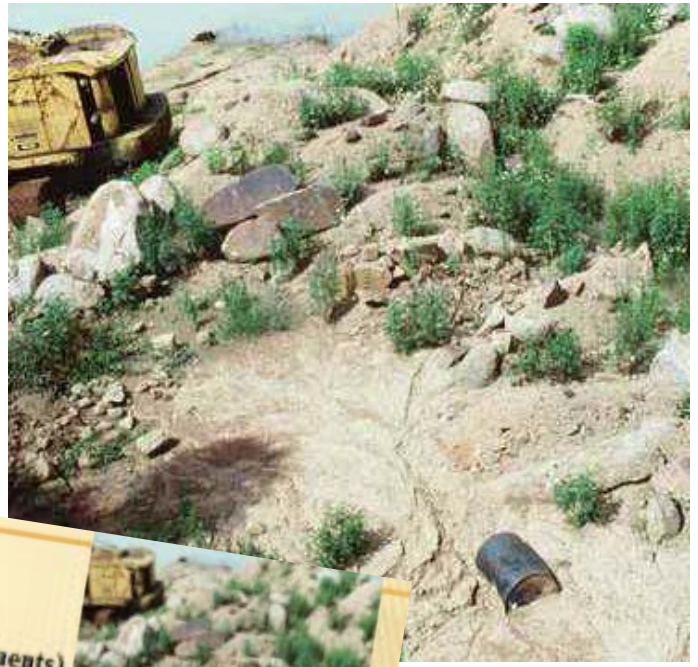
Why? …

Surface and Groundwater pollution threat



Pollution concerns
(lubricants, metals & other constituents)
to surface and groundwater.

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Why? … What's the need?

- Preceded by NR 340 to protect navigable waters, fish & invertebrate habitat, plant communities
- Addresses 1987 study finding:
  - Water quality/ turbidity issues
  - Bank instability
  - Bedload modifications
  - Sedimentation – impacts on spawning etc.

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Why? … What's the need?

- Preceded by NR 340 to protect navigable waters, fish habitat and spawning
- Option existed to chose to enact 66.038 establishing a NMM reclamation program
- Didn't really get much traction
- Mandate for counties when governor signs law in 1994 to promote a "level playing field"

Abandoned mines … in the rear view mirror

Abandoned sites result in a loss of productive and use, loss or degradation of fish and wildlife habitat and loss of tax revenues.

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Background & History

- Governor Thompson signed state law in 1994
- DNR as required by that law embarks on a six year consensus rulemaking process with advice of a TAC
- DNR & advisors writes model ordinances for use by counties

Overview: History

Consensus Conceptual Framework
For A Revised
Nonmetallic Mining Reclamation Program

Nonmetallic Mining Council
and
Technical Advisory Committee

January 10, 1996

OBJECTIVE: This framework would create an outcome oriented statewide nonmetallic mining reclamation program which is more efficient and streamlined, less burdensome, more flexible and far less complicated than the program under the current statute. This framework was agreed upon after considering the following criteria:

- There must be a statewide program in all counties which effectively assures successful reclamat
operating nonmetallic mining reclamatic

- There must be a reasonably level regula
field from county to county (recognizir
local flexibility).

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Uniform performance-based reclamation standards and administrative requirements

- Uniform statewide reclamation standards
- **Reclamation Standards are not prescriptive.**
- **Instead they are flexible as they are performance based standards**
- Program administration
- Program funded through fees on active operations

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Performance based Reclamation Standards are <u>not</u> prescriptive – so flexible

- Erosion and sedimentation control during site development
- Topsoil removal, storage and protection
- Protection of surface and groundwater
- Contemporaneous reclamation
- Grading for reclamation (prior to topsoil redistribution)
- Topsoil redistribution
- Seeding, soil amendments, mulch and erosion control
- Maintenance during monitoring period
- Evaluation of reclamation success – quantitative success standards

Wisconsin's Nonmetallic Mining Reclamation Program

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Role of the County or Local Regulatory Authority (RA)

The county or municipal entity administering a nonmetallic mining reclamation program will:

- Review reclamation plans, issue reclamation permits and conduct **compliance monitoring** site inspections.
- RA collects permit review fees & annual acreage fees to cover their costs, including hearings & complaints and/or enforcement.
- **FA –keeping current and accurate**
- **Evaluation of reclamation success – quantitative success standards**

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Wisconsin's Nonmetallic Mining Reclamation Program

Field inspections – major role of NR 135 RAs.

Scope of NR 135 RA inspections:

- Ensure unreclaimed acreage (assessable for annual fees AND high importance for FA amounts) estimates are correct,
- Ensure that the reclamation plan is being properly followed especially during times when the surface area being mined or "footprint" is increasing or when active reclamation /site stabilization activities taking place,
- Address complaints from citizens.
- 135 RA inspections will be needed to ascertain the success of reclamation ands per criteria in the approved reclamation plan - Does the RA have a method of determining the success of reclamation in the field and/or in the office?
- inspections will be needed to ascertain the success of reclamation ands per criterial in the approved reclamation plan. It's important to have the method of **determining the success of reclamation** stated in the reclamation plan as well as the criteria.

Target Post-mining land use - NR 135.19(3)

Reclamation Plan- a "blue print" – Provides:

- ❑ **how reclamations standards are to be met in achieving approved post-mining land use**
- ❑ **reclamation standards enforced via reclamation permit = fair competition & known expectations**
- NR 135 permit is based on approvable reclamation plan & posting of financial assurance

Wisconsin's Nonmetallic Mining Reclamation Program

Reclamation Standards: Plan & Permit Connections

- Post mining land use
- Lays out the materials & activities needed to achieve the approved land use.

Administrative Requirements

Funding – fees on unreclaimed acres

Annual reports.

As required by s. NR 135.39(7), Wis. Adm. Code, the DNR prepares a report once every five years for the Natural Resources Board (NRB) on the reasonableness and fairness of nonmetallic mining (NMM) fees charged by county or local NR 135 Regulatory Authorities (RAs).

IMPORTANT!

Recordkeeping: especially administrative costs

ESTIMATING FEES TO SUPPORT A NONMETALLIC MINING RECLAMATION PROGRAM

Pub. - WA 832 -2006

As required by law, DNR oversight of county and local programs includes oversigh with emphasis on fees - review of RA annual reports to DNR.

The department conducts comprehensive audits of non-metallic mine reclamation programs. Fees (revenue) vs. administrative expenses are examined as part of these audits.

Further, the department will use this fee data and the advice of the Nonmetallic Mining Advisory Committee in preparing reports on the reasonableness of fees when compared to administrative costs. These periodic reports are submitted to the Natural Resources Board

Wisconsin's Nonmetallic Mining Reclamation

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Nr 135 RA's Share of Fees

The regulatory authority's share of the annual fees shall as closely as possible equal it's expenses to administer it's reclamation program. Costs include:

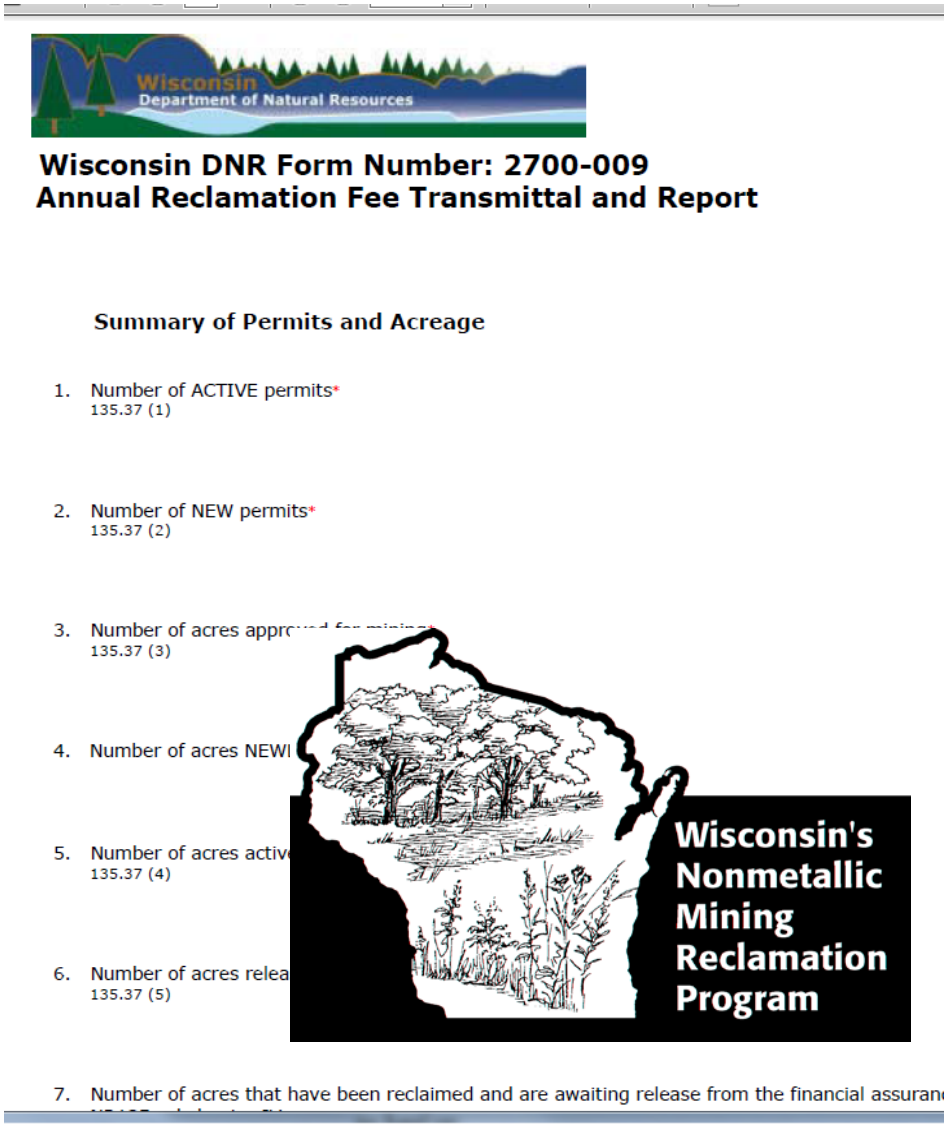
- Program administration (staff time)
- Inspections
- Fees charges for equipment, software license etc. (usually prorated among programs)
- Associated overhead
- Review of reclamation plans or modifications may or may not require a fee.

NR 135 PROGRAM **ADMIN. REQUIREMENTS**

Annual Reports to DNR

- Operators report to RAs on Active Mines and acreage
- Misc.

- Transfer DNR portion of annual fees "unreclaimed acres" to DNR
- Provide annual summary reports to DNR



Planning and zoning connections with Reclamation

Registration of containing a NMM deposit per NR 135.53-.64

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Registration under NR 135.53-.64 may aid long-range planning

- This can dovetail with the Wisconsin Comprehensive Planning Legislation and Smart Growth initiative and attendant land use planning and zoning efforts.
- A landowner may register his or her land. If a mine operator is not the landowner, the operator must coordinate the registration process with the landowner
- registered professional geologist uses data to document that the deposit is a "marketable deposit”
- Zoning authorities must have the opportunity to review proposed registrations and, if necessary, object to them

Registering nonmetallic mineral deposits

http://dnr.wi.gov/topic/Mines/Deposit.html

Document Number

Registration of Marketable Nonmetallic Mineral Deposit

Type or print in black ink, keeping inside lined margins

1. By this instrument the following landowner(s):

2. Who own(s) land located in _____ county, Wisconsin and with a **current** legal description of the land to be registered as set forth below (attach additional materials if necessary):

SPACE RESERVED FOR RECORDING INFORMATION

NAME AND RETURN ADDRESS

PARCEL IDENTIFICA

3. Do hereby claim the land contains a marketable nonmetallic mineral deposit as defined in Wis. Adm. Code based on the following certification and delineation by a Wisconsin registe geologist or registered professional engineer, in conformance with NR 135.56(1), Wis. Ac additional information or materials as necessary):

4. Attestation to the information in 3. above by the Wisconsi egistered professional g registered professional engineer:

I hereby certify that this document contains a description of a marketable nonme deposit consistent with the requirements of Chapter NR 135, Wisconsin Admini

Name, Title _____

Signature _____

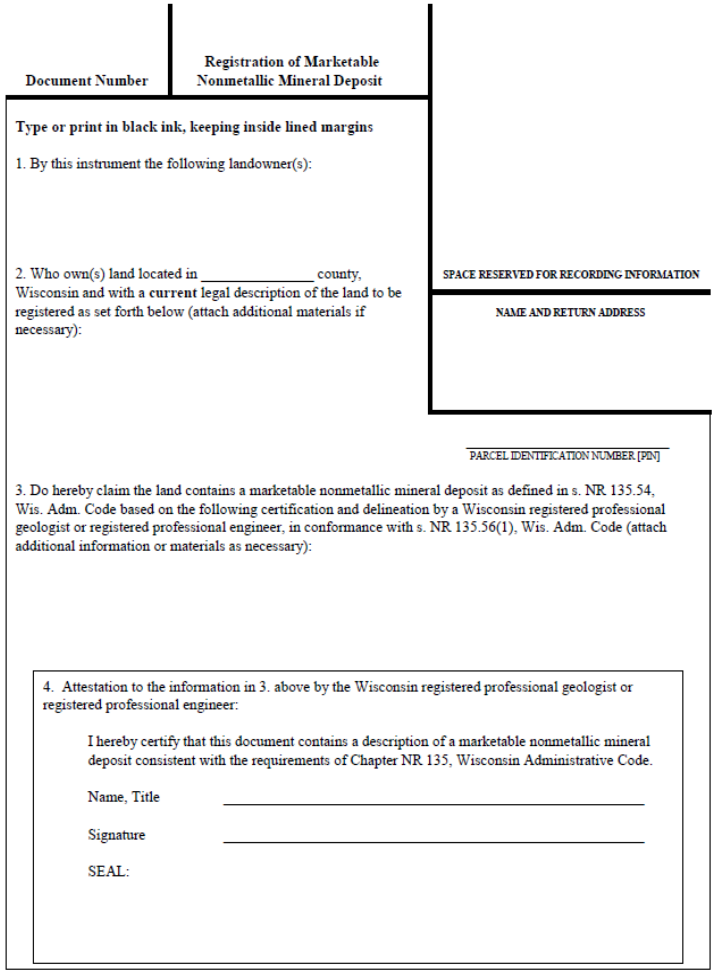
SEAL:

This nonmetallic mineral registration meets the requirements included in NR 135 Wisconsin Administrative Code which allows for the registration of such deposits.

The nonmetallic mineral deposit is commercially feasible to mine and has significant economic and strategic value. The nonmetallic mineral deposit located on this site is glacial end (terminal) moraine that contains high quality natural sand & gravel. The sand & gravel is of excellent quality for making aggregates for all types of construction needs including asphalt and concrete. Testing revealed the deposit to cover the entire property. The depth of the marketable deposit extends to a depth of at least 35-40 feet below the existing ground surface. The relatively thin overburden compared to the significant depth of the sand & gravel at the site, extract the nonmetallic minerals. The well graded high-quality nature of the deposit can meet current and future specifications for the needed aggregate pr

Registering nonmetallic mineral deposits

http://dnr.wi.gov/topic/Mines/Deposit.html



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2. Who own(s) land located in _____ county, Wisconsin and with a current legal description of the land to be registered as set forth below (attach additional materials if necessary):

SPACE RESERVED FOR RECORDING INFORMATION

NAME AND RETURN ADDRESS

PARCEL IDENTIFICATION NUMBER [PIN]

3. Do hereby claim the land contains a marketable nonmetallic mineral deposit as defined in s. NR 135.54, Wis. Adm. Code based on the following certification and delineation by a Wisconsin registered professional geologist or registered professional engineer, in conformance with s. NR 135.56(1), Wis. Adm. Code (attach additional information or materials as necessary):

4. Attestation to the information in 3. above by the Wisconsin registered professional geologist or registered professional engineer:

I hereby certify that this document contains a description of a marketable nonmetallic mineral deposit consistent with the requirements of Chapter NR 135, Wisconsin Administrative Code.

Name, Title _____

Signature _____

SEAL:

The registration **of land containing nonmetallic mineral deposits is complete once** a deed notice is recorded with the county registrar of deeds

Registration lasts for 10 years. It may be renewed for one additional 10-year period by notifying the zoning authority and renewing registration with the county registrar of deeds.

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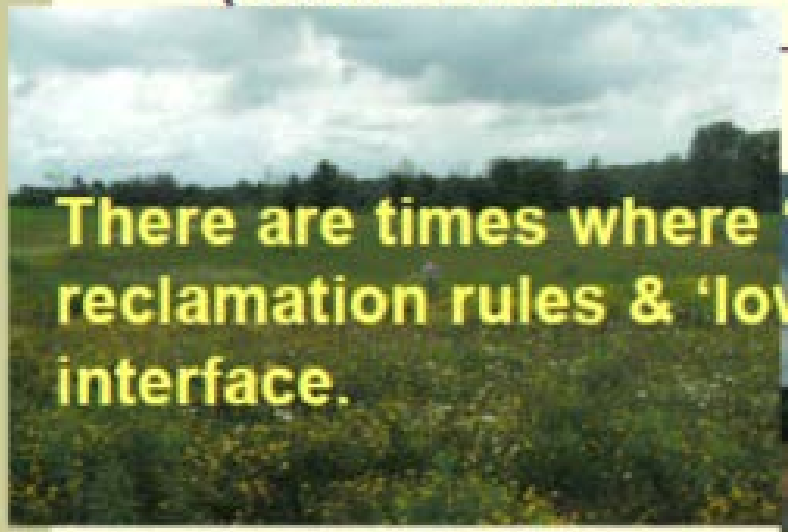
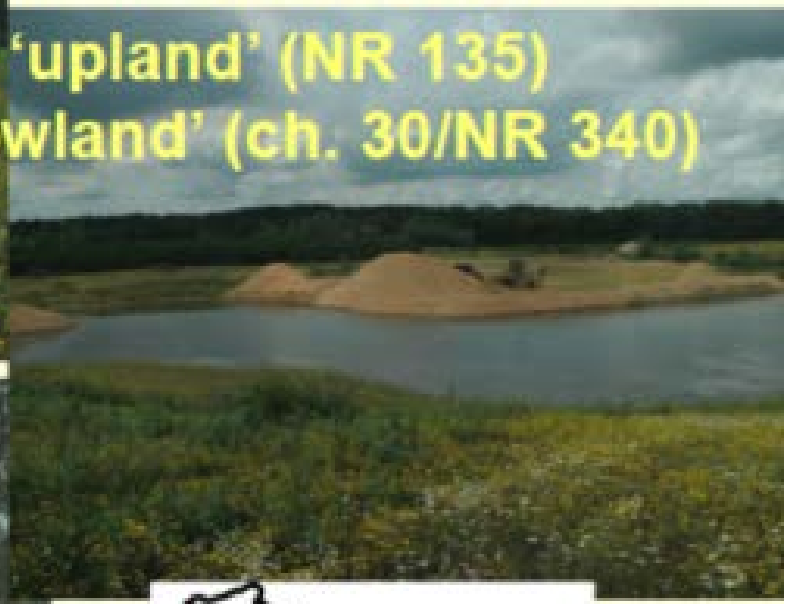
Chapter 30 and NR 340

NR 135 & Chapter 30 (Shoreland & Wetland Zoning)





Wisconsin's Nonmetallic Mining Reclamation Program

Nonmetallic NR 135 - Roles of DNR & County

DNR RESPONSIBLE FOR OVERSIGHT- AND TO ENSURE CONSISTENCY

- DNR audit county and municipal nonmetallic mining reclamation programs DNR serves as “Fail Safe” to ensure compliance with standards;
- DNR continues to provide technical support;
- DNR coordinates with the Nonmetallic Mining Reclamation Advisory Committee (NMAC) to obtain feedback & advice.

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Nonmetallic NR 135
Roles of NMAC

- DNR worked with a Technical Advisory Committee (TAC) to draft the reclamation rule – NR 135.
- That TAC morphed into the Nonmetallic Mining Reclamation Advisory Committee (NMAC)which provides continued input from stakeholders
- TAC also consults on Fee Report to NRB and if a NR 135 RA faces having its program revoked

Wisconsin's Nonmetallic Mining Reclamation Program

2008 Fee Report to Natural Resources Board

General program information	
Regulatory authority/audit year	Richland County 2007
Administered by:	Richland County Zoning and Assisted by Land Conservation
Fee structure • Revised with amended ordinance? • Other?	$ 75.00 per acre at time or audit and rose to $ 100.00 per acre with adoption of revised NR 135 ordinance on May 15, 2007.
Overhead costs - expenditures on program administration	
Supplies	N/A
Salary & fringe benefits	$ 9,025
Administrative support/ data management	$ 400
Transportation and office space/ other	$ 2,000
Equipment or services (GPS or fees to access data base or contract services).	N/A
Total administrative expenses	$ 11,425
Fees collected on unreclaimed acres	$ 10,770
(+) Reserves (if applicable)	N/A
(-) Amount transferred to DNR	$ 1,100
Total operating revenue	$ 9,670
(-) Total administrative expenses	$ 11,425
Surplus or (deficit)	$ -1755

DNR Evaluation of the Reasonableness of Fees Compared with the Expenditures of Regulatory Authorities Administering NR 135 Nonmetallic Mining Reclamation Programs in Wisconsin

Tom Portle, Wisconsin Department of Natural Resources
September 2008 WA1366

Executive Summary

The Department of Natural Resources (DNR) prepares a report once every five years (the "Fee Report") for the Natural Resources Board (NRB) on the reasonableness and fairness of nonmetallic mining reclamation fees charged by county or local regulatory authorities (RAs). The DNR has prepared this report to satisfy the requirement in s. NR 135.39(7), Wis. Adm. Code. The Fee Report is intended to facilitate statewide consistency and accountability among RAs' nonmetallic mining reclamation programs.

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2013 Conclusions of Fee Report to the NRB

Fees assessed by NR 135 RAs remain reasonable and fair. Most RAs met the code objective that there be a close balance between revenue fees and expenses.
It appears that administrative expenses are, in general, closely balanced with program revenue and trending to become looking at the 2008 and 2013 reports.

Category	2008 NRB Report	2013 NRB Report
Surplus > $100/permit	4 (17%)	3 (8%)
Generally Balanced	12 (50%)	29 (74%)
Deficit > $100/permit	8 (33%)	7 (18%)
Total RAs evaluated	24	39

while **“closely” balanced remains the main test** and is readily quantifiable; it remains necessary to also consider “fairness” and “reasonableness” as these could potentially be of concern even when balanced.

Zoning Highwalls Reclamation

- Original Law had “buffer areas” to try to address highwalls
- This was viewed as in the purview of zoning and removed
- Highwalls in new reclamation plans?
- Zoned Jurisdiction?
- Unzoned?

Highwalls Safety & Stability

Reclamation Plan - If leaving a highwall is the option chosen there must be a demonstration that it is stable and safe.

… Also, the highwall should fit into the mosaic of adjacent land use(s).

NR 135.19(4)(a)(c)
- NR 135.10(1)

Unstable – clay pockets in Prairie du Chien formation

NR 135.10(1) Safety & Stability reclamation standard

Construct a safety berm (or use very large rocks) to mitigate potentially unsafe highwalls

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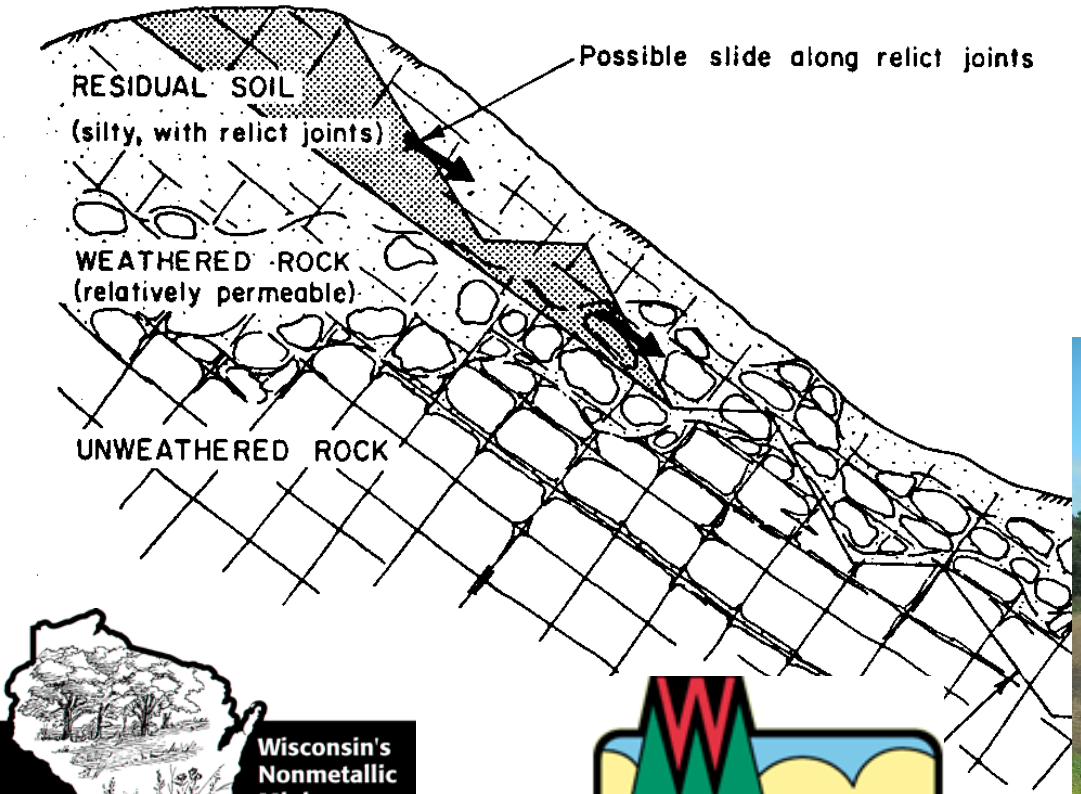
Final Grading and Slopes

Surface Graded and Soil Redistributed and Prepared Prior to Seeding

Final Grading and Slopes: (1) All areas affected by mining shall be graded in accordance with the approved reclamation plan to achieve a stable and safe condition consistent with the postmining land use.



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Highwall reclamation including reclamation blasting.

Materials used in backfilling a highwall can serve to mitigate safety hazards & improve slopes for reclamation

Same site once reclaimed

November 2013.

August 2015

September 2016

Post-mining land use at reclaimed sites that had/have highwalls

Montello Quarry Final Land Use - park

Reclaimed quarry in Monroe County

Golf course in Sauk County

Reclaimed quarry in Vernon County

Reclamation Evaluation

Reclamation Plan: Quantifiable Success Criteria for COC

- Used to issue Certificate of Completion (COC) & release Financial Assurance (FA),

quantifiable

defensible and

well documented

(photos … field notes).

Process – Evaluation for Successful Reclamation - COC Issuance & Release of Financial Assurance (FA)

- **NOC** - Notice of Completion given to the RA by the operator - begins evaluation period (site maintenance conducted);
- **The RA completes evaluation of reclamation;**
- **COC** - issued to operator by RA;
- **FA released** for all or portion of site.

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Normally all is OK, & a COC is issued & FA released.

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Certificate of Completion of Reclamation

This Certificate of Completion (COC) is hereby awarded to the Hardroc Mining Company by the (County/Department/RA) in acknowledgemer that the criteria established in NR 135.19 (4) (g) have been met. This certificate acknowledges of the successful completion of all reclamati activities in accordance with: the approved reclamation plan, with Chapter NR 135 Wis. Adm. Code and with the Bedrock County Code of Ordinances, Chapter xyz.

This COC is for the Hardrock Mining Company's Boon Lake Mine site i Bedrock County, Wisconsin. The mine site is located in Section Town ___ Range E/W. (and is further described in the description found in ……..)

Hard rock Mining Co. is to be commended for their diligence in achievi reclamation success and a productive post mining land use.

What If NOT Successful?!
If Permittee Unable to Reclaim site?

- Financial assurance (FA) payable to the Regulatory Authority (RA) The purpose of FA is to ensure that the RA has sufficient funds to hire a contractor in event of a failure.
- Enforcement
- RA takes charge of reclamation
- **Legal Options**

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Calculating Financial assurance

FA –keeping current and accurate

Element / Reclamation Activity	Dollar Amount
A. Earthwork and Grading	
B. Topsoil Management	
C. Revegetation Plan	
D. Erosion Control: Stabilization of Soil Conditions	
E. Maintenance and Monitoring Prior to Release of Financial Assurance and Until Declaration Of Completion (DOC)	
F. Management of Refuse or Other Solid Waste (may Include Removal of Structures, Roads, Foundations, etc.)	
G. Other Reclamation Activities (List as Many as Necessary)	
GRAND TOTAL	

The burden is on the operator to provide this information but you must check the calculations

Process

II. Overview of Financial Assurance Process[2]

The following flowchart may be useful as a general guide to the steps an operator may need to follow during the process of providing acceptable financial assurance. Financial assurance is part of the process for obtaining a reclamation permit, which is based on the approval of a reclamation plan and the posting of financial assurance.

1. The operator contacts the regulatory authority to begin the process of obtaining a reclamation permit. This process will ultimately result in an approval decision regarding the plan and a target post-mining land use and a credible estimate of the cost of reclamation (financial assurance).

↓

2. The operator prepares the reclamation plan, and proposes a dollar amount to represent the total cost of each reclamation activity and for each phase of reclamation. This results in an estimate of financial assurance requirements at any given point in time.

↓

3 This cost estimate is submitted to the RA with the reclamation plan.

↓

4. If the plan is approved, the RA then provides written notification of the acceptability of the financial assurance estimate to the operator [s. NR 135.40(1)].

↓

5. A form of financial assurance is then selected by the permittee and posted with the RA to cover financial assurance [s. NR 135.40(4)]. As a condition of the permit, financial assurance, payable exclusively to the regulatory authority, is filed with the RA [s. NR 135.40(2)]. Please see **Attachment D** for an explanation as to the various forms of financial assurance.

Note: Once financial assurance has been established the amount is reviewed periodically by the RA to assure that it equals outstanding reclamation costs per s. NR 135.40(3). Any interest from the financial assurance must be paid to the operator per s. NR 135.40(4).

The burden is on the operator to provide this information but you must check the calculations

From:

A Guide to Preparing and Reviewing Financial Assurance for Reclamation of Nonmetallic Mining Sites in Wisconsin PUBL-WA- 835 2002 July 2002

Financial Assurance

Acceptable Forms:

- Bonds
- Cash
- Certificates of deposit
- Irrevocable letters of credit
- Irrevocable trusts
- Escrow accounts
- Government securities
- Net worth test per s. 289.41(4) Stats.

A blend of any of these options is also acceptable

Managing Risk – Financial Assurance (FA)

"Thumbnail" Reminder main Points

- **Adequate funds** for all materials & activities needed to achieve the approved land use
- Financial assurance (FA) payable "*exclusively*" to the county Reg. Authority (RA)
- Purpose: to ensure that the RA has sufficient funds to hire a contractor in event of default.

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What we've learned

What we've learned and todays issues

- Be aware of financial assurance expiration dates
- Photo document the areas the need reclamation and the resources at the site.
- Experience suggests that cost of bidding project can use up a % of FA
- Administrative costs or mobilization costs may be included in FA $ amount

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What we've learned and today's issues

Periodic reevaluation of dollar amount of Financial Assurance

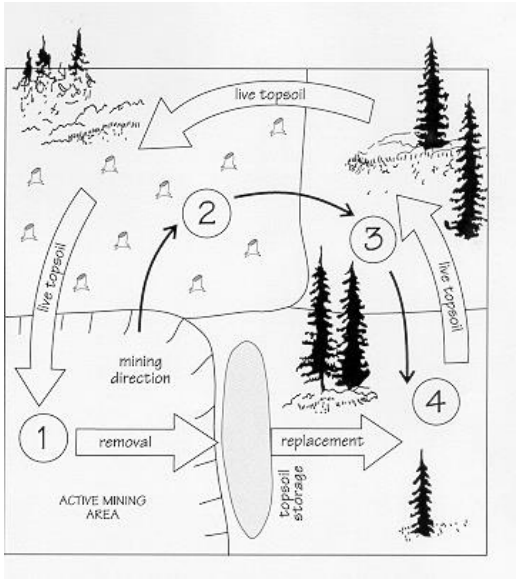
- Ensure FA remains adequate to cover actual outstanding reclamation costs per NR 135.40(3) - requires that financial assurance should be reviewed periodically and updated FAs does not reflect actual reclamation costs;
- Realize some never did reflect

- Be aware of "*hidden costs*" including :
  - **bidding the project**
  - **mobilization and**
  - **oversight - inspections**

What we have learned & todays issues

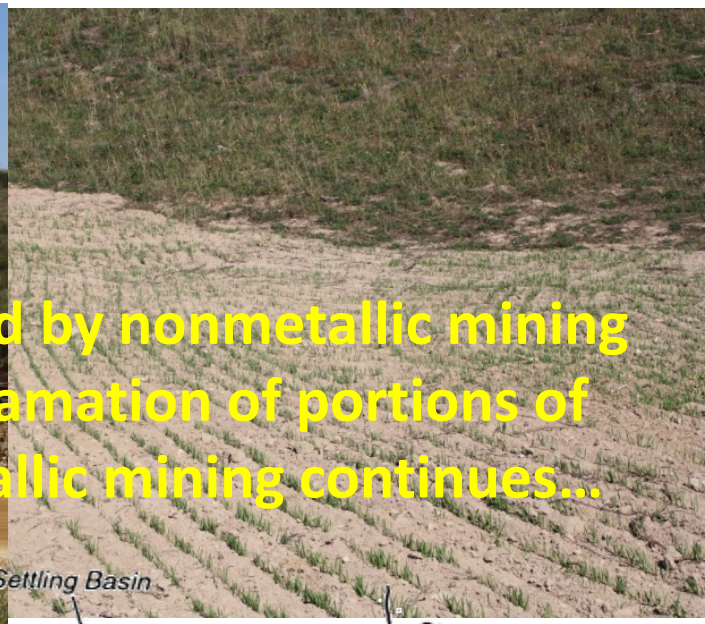
- keep the disturbed area to a minimum for contemporaneous reclamation
- Statutory requirement

- Inactive - NR 135.39
- Intermittent NR 135.19 & NR 135.14
- Interim NR 135.41

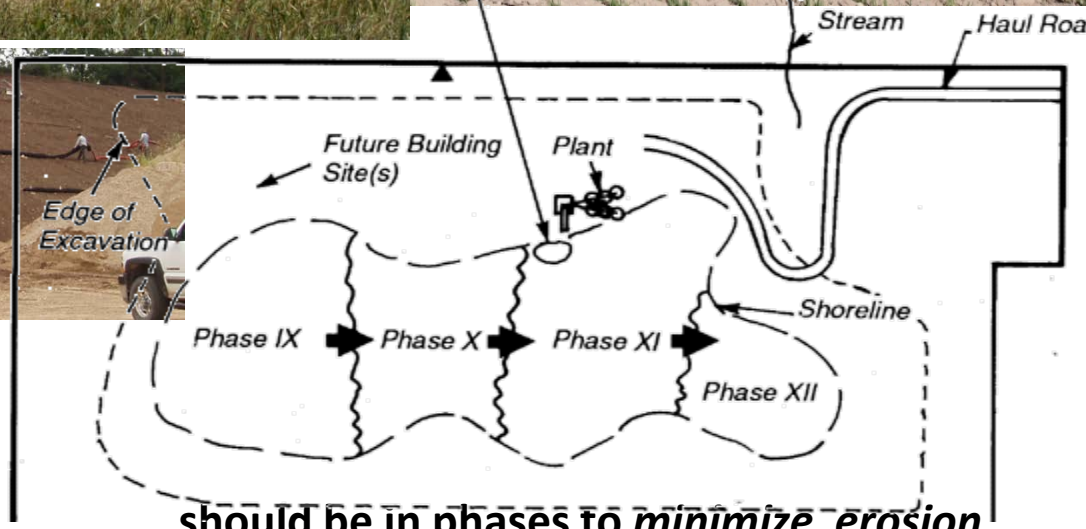


- **Cuts costs of annual reclamation fees; &**
- **Saves on cost of maintaining financial assurance.**

NR 135 Uniform Reclamation Standards
Contemporaneous Reclamation



NR 135.06 (2) … "minimize the area disturbed by nonmetallic mining and to provide for nonmetallic mining reclamation of portions of the nonmetallic mining site while nonmetallic mining continues…



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Be proactive

should be in phases to *minimize* erosion

Example – via diligence, communication and site inspections -

FA may be reduced because he has completed the initial and more costly reclamation efforts.

The Quarry on County ET operated by Focused Limestone(FL) LLC, located in S.27 T.13N, R1E Tow of Summit, Sand County, WI has had reclamation efforts underway. **Based on my site inspection** of Quarry on 9-16-08:

- Observed currently backfilling and grading of slopes
- spreading subsoil and topsoil across the Quarry floor
- Shortly after I was informed they have seeded these areas.
- FL LLC currently has an Irrevocable Letter of Credit in the amount of $60,000
- Based on above the FA $ amount reduced to $20,000
- This amount will still be needed until the vegetation meets the numerical reclamation standards for no less than 1 year and after an COC inspection is conducted to document when the site is top receive its COC.

What we have learned

What If NOT Successful?!

The Amon Sites –Receivership

- **B.R, Amon and Sons was placed into receivership by the Circuit Court of Walworth County on April 15, 2013 and Ronald Carlson was appointed receiver by the Court.**
- **B.R, Amon and Sons operated 8 NMM mining sites in Walworth County. 4 leased NMM sites. and 3.5 owned NMM sites. (BR Amon and Sons owned 1/2 interest in the County's only hard rock quarry, the other 1/2 is owned by Mann Brothers, (that's another story). Leases have a value and releasing the leases takes approval of the Circuit Court. mulch etc.**

What we've learned and today's issues

Managing Risk –

Defunct "*Automatic*" permits (ended in 2003)/ (sometimes)" *mines & acreage* - corresponding issues with "*Inactive*" and differing understandings of its meaning

How long can something be considered "inactive"? – should be spelled out in approved reclamation plan.

Taxpayers in jurisdiction (and state) stuck with paying for other's responsibility or left with a safety hazard or attractive nuisance or pollution

Failure to maintain consistency and a "level playing field" for all operators

What we have learned

Actions NR 135 Reclamation program administrators can take:

Inventory topsoil and subsoil resources at the site during annual inspections.

- If topsoil and subsoil resources identified in the reclamation plan are gone financial assurance should be adjusted upward.
- Importing material in the case of default will greatly increase reclamation costs.

What we have learned

Lease and permit duration

- **Leased sites** - new owner does not like plan or post mining land use or both?
- period of operator reclamation responsibility may extend beyond permit duration
- Communication with new owner(s)
- Certification of reclamation plan by new lessor/landowner –

be aware of changes in owners

Leased sites may cause additional complexities

LESSONS LEARNED WHILE GOING THROUGH A PERMITTEE'S FINANCIAL ASSURANCE DEFAULT

What we have learned & todays issues

- **When leases end – issues, new owners – how to stay on top of this and protect your jurisdiction**
- Develop a positive relationship with non-operator land owners during the good times
- The reclamation plan assures owners of a land form that will support a post mining land use.

Be proactive

What we have learned
period of operator responsibility

- Because lease may be terminated or expire before all mining and reclamation complete the period of operator responsibility extends beyond the Reclamation permit
- Period of operator responsibility Extends until COC and FA released
- FA must stay in force even if permit is no longer
- FA may be the tool to enforce reclamation

What we have learned

Magnet for illegal dumping of solid waste

What we have learned fill clean fill and SW

- Include in reclamation plan or modification
- Cover with FA
- Risk of inactive or long-term holding patrtern

“CLEAN FILL” ONLY

This facility operates in conformance with NR 500.08 (2)(a) of the WI Administrative Code and accepts only **clean soil, brick, building stone, concrete and reinforced concrete, broken pavement, and wood.**

Materials that are stained, painted, have a strong odor, or exhibit other signs of contamination **will not be accepted!**

Roles communication with operators

- **Outreach event for Operators**
- **Newsletters or updates**
- **Info sent with fee and AR time comes.**
- this letter to inform you of a few changes with the program.

Wisconsin's Nonmetallic Mining Reclamation Program

Discussion

Certificate of Completion of Reclamation

s Certificate of Completion (COC) is hereby awarded to the Hardroc
ing Company by the (County/Department/RA) in acknowledgemer
t the criteria established in NR 135.19 (4) (g) have been met. This
ificate acknowledges of the successful completion of all reclamati
vities in accordance with: the approved reclamation plan, with
pter NR 135 Wis. Adm. Code and with the Bedrock County Code of
inances, Chapter xyz.

s COC is for the Hardrock Mining Company's Boon Lake Mine site i
rock County, Wisconsin. The mine site is located in Section
wn ___ Range E/W. (and is further described in the description
nd in ……..)

d rock Mining Co. is to be commended for their diligence in achievi
amation success and a productive post mining land use.

WISCONSIN
DEPT. OF NATURAL RESOURCES