

April 8, 2025

Committee on Energy and Natural Resources
U.S. Senate
304 Dirksen Senate Building
Washington, DC 20510

Dear Members of the Senate Energy and Natural Resources Committee:

The 118 undersigned organizations are writing on behalf of our millions of members and supporters to express our extreme opposition to two bills S. 239 (Sen. Daines)/H.R. 725 (Rep. Downing) and S. 362 (Sen. Daines)/H.R. 931 (Rep. Downing). These bills will allow a coal mining company to bypass existing law and to proceed with a massive expansion, which would result in up to 375 million tons of greenhouse gas pollution (nearly 8% of the annual total for carbon dioxide emissions in the United States). This Climate Bomb legislation would allow Signal Peak Energy to avoid basic federal oversight and to export all of its coal to Asia.

The Signal Peak coal mine is an underground, long-wall coal mining operation north of Billings, Montana. It is currently seeking permission for a massive expansion to continue mining 176 million tons of coal. Based upon the carbon content of the coal, combustion would result in approximately 375 million tons of carbon pollution, an amount greater than the annual emissions of all but 16 countries in the world today. At a time when it's more important than ever to make climate progress, Sen. Daines' bills significantly sacrifice our climate for a company rife with corruption, scandal, and a litany of safety violations.

Signal Peak Energy recently ended a federal criminal probation period for willfully lying to federal mine regulators about serious injuries to workers and for willfully dumping toxic mine waste into an area intended to supply replacement water for people harmed by the mine. In addition to its criminal background, Signal Peak, its former executives, and its owners have an arm-length rap sheet of criminal activity and non-compliance with environmental and worker safety laws. The company's lawlessness was chronicled in the New York Times: [A Faked Kidnapping and Cocaine: A Montana Mine's Descent Into Chaos](#). An assistant U.S. Attorney called the mine a "den of thievery." In the past five years, Signal Peak, its executives, and employees have been convicted of or pled guilty to embezzlement, money laundering, drug trafficking, and illegal gun possession. In the past five years, two owners of the Signal Peak Coal Mine (Gunvor Group and FirstEnergy Corp.) have collectively been fined over \$1.1 billion for bribery and fraud.

Together, these bills seek to allow — without environmental scrutiny — large-scale and extremely destructive underground mining of coal at the Bull Mountains Mine. The mining of federal coal was halted because the operation had not been subject to an environmental impact statement (EIS) under the National Environmental Policy Act to fully consider the mine's climate impacts. In determining that the mine needed an EIS on its climate impacts, the Ninth Circuit Court of Appeals stated that "the coal from this project is expected to generate more GHG emissions than the single largest source of GHG emissions in the United States." The U.S.

Office of Surface Mining is currently conducting that review, but either one of Sen. Daines' bills would fundamentally undermine or entirely eliminate the environmental review process.

Finally, Signal Peak's large underground mining operation harms surface landowners, water resources, and wildlife. The mine has dewatered many important springs that originate from a perched aquifer above the mine. These springs provide essential water for wildlife and livestock. They are critical to long-running ranching operations that now have to find replacement water. The mine has caused extensive subsidence of the surface leading to disruption and harm to existing landowners and their livelihoods. Since the Bull Mountains Mine began operations in 2008, the company has directly or indirectly forced multiple ranchers off the land and out of the Bull Mountains.

If S. 239/H.R. 725 and S. 362/H.R. 931 are enacted, this massive mine expansion would proceed, unchecked, allowing for the release hundreds of millions of tons of carbon emissions into our atmosphere. We respectfully request that this legislation be rejected, whether as stand-alone legislation or considered as part of a larger package of bills. The future of the climate depends on it.

Sincerely,

350.org National
Center for Biological Diversity
Citizens Coal Council
Citizens for Clean Energy
Climate Equity Policy Center
Climate Justice Alliance
Earthjustice
Earthworks
Electrify Now
Endangered Species Coalition
Families for a Livable Climate
Global Witness
Indigenous Environmental Network
League of Conservation Voters
Movement Rights
Natural Resources Defense Council
Ocean Conservation Research
Oil and Gas Action Network
Oil Change International
Partnership for Policy Integrity
Protect Our Winters
Sierra Club
The Wilderness Society
Turtle Island Restoration Network
Waterkeeper Alliance

Western Environmental Law Center
Western Organization of Resource Councils
Western Watersheds Project
1000 Grandmothers for Future Generations
198 Methods
350 Bay Area Action
350 Brooklyn
350 Hawaii
350 Montana
350 Seattle
Animals Are Sentient Beings, Inc.
Appalachian Citizens' Law Center, Inc.
Arizona Health Professionals for Climate Action
Athens County's Future Action Network
Baltimore Phil Berrigan Memorial Chapter Veterans For Peace
Benicians for a Safe and Healthy Community
Between the Waters
Black Hills Clean Water Alliance
Boston Catholic Climate Movement
Breathe Project
Bridger Bowl Ski Area
Bull Mountain Land Alliance
CASA
Central Jersey Coalition Against Endless War
Coal River Mountain Watch
Coalition Against the Rockaway Pipeline
Color Brighton Green
Concerned Health Professionals of Pennsylvania
Divest NJ
Don't Waste Arizona
Earth Ethics, Inc.
Earth Ministry/Washington Interfaith Power and Light
Fox Valley Citizens for Peace & Justice
Friends of 2 Rivers, Inc.
Gallatin Valley Sunrise
Gas Free Seneca
Georgia Interfaith Power and Light
Good Neighbor Steering Committee of Benicia
Great Basin Water Network
Greater Boston Physicians for Social Responsibility
Grey Nuns of the Sacred Heart
Healthy Climate Wisconsin
Idle No More SF Bay
Institute for Policy Studies Climate Policy Program
International Marine Mammal Project of Earth Island Institute
JUJustice Washington

Kentucky Resources Council
Lynn Canal Conservation
Maryknoll Fathers and Brothers
Mennonite Central Committee U.S.
Michigan Environmental Justice Coalition
Milwaukee Riverkeeper
Mining Impact Coalition of Wisconsin
Montana Environmental Information Center
Montana Health Professionals for a Healthy Climate
Montana Sierra Club
Native Village of Dot Lake Alaska
Natural Capitalism Solutions
NC Climate Justice Collective
New Energy Economy
New Mexico Environmental Law Center
New York Climate Action Group
New York Progressive Action Network
North American Climate, Conservation and Environment (NACCE)
North Country Earth Action
Northeastern Minnesotans for Wilderness
Northern Alaska Environmental Center
Northern Plains Resource Council
Nuclear Information and Resource Service
NW Energy Coalition
NY Climate Advocacy Project
NY Clinicians for Climate Action
Okanogan Highlands Alliance
Park County Environmental Council
Pueblo Action Alliance
Putnam Progressives
Raging Grannies
ReGenerous Cities, LLC
Renewable Northwest
Resilient Helena
Resource Renewal Institute
Rise Up WV
Save Lake Superior Association
Save Our Sky Blue Waters
Scientist Rebellion, Turtle Island
Seneca Lake Guardian
Sisters of Mercy of the Americas Justice Team
Sleeping Giant Citizens Council
Teachers Insurance Annuity Association-Divest!
Terra Advocati
Upper Peninsula Environmental Coalition
Wisconsin Environmental Health Network

Yellowstone-Teton Clean Cities