



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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General Correspondence incoming
CC: Dana
Daron
Howard Strand

RECEIVED
JUN 28 2010
DIV. OF OIL, GAS & MINING

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JUN 23 2010

Ref: EPR-N

Daron R. Haddock
Utah Division of Oil, Gas, and Mining
1594 West North Temple, Suite 1210
P.O. Box 145801
Salt Lake City, UT 84114-5801

Howard E. Strand
Office of Surface Mining
Denver Field Division
P.O. Box 46667
Denver, CO 80201-6667

Re: Suggestions for Coal Program Evaluation Topics
Your Request dated May 26, 2010

Dear Mr. Haddock and Mr. Strand:

In your letter of May 26, 2010 the Utah Division of Oil, Gas and Mining (UDOGM) and the United States Department of Interior, Office of Surface Mining (OSM) requested suggestions for coal mining topics that OSM could evaluate as potential improvements to the Utah Coal Regulatory Program oversight process. We also reviewed the most recent annual report that addresses UDOGM's effectiveness with implementation of the coal regulatory program.

EPA is concerned with the unmitigated methane emissions associated with Utah coal mining projects. Methane associated with coal seams and the surrounding rock is liberated during the mining process as well as the subsequent fracturing of the overburden. Typically, underground coal mining projects would include a ventilation system and gob vent boreholes to release methane emissions directly to the atmosphere¹.

EPA supports energy conservation as an important pollution prevention measure, and notes that Executive Order 13514 (Oct. 5, 2009) makes "reduction of greenhouse gas (GHG) emissions a priority for Federal agencies" and establishes a national policy that Federal agencies "shall increase energy efficiency; measure, report, and reduce their greenhouse gas emissions from direct and indirect activities..."

EPA also maintains a voluntary Coalbed Methane Outreach Program, which promotes cost-effective recovery and use of methane released from coal mining activities. From 1994 through 2008, US coal mines captured over 568 billion cubic feet of coal mine methane for use

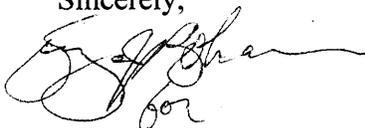
¹ Methane is a greenhouse gas that remains in the atmosphere over a significant period of time with at least twenty times the effectiveness of carbon dioxide in trapping heat radiated from the earth. During the past century humans have substantially added to the amount of greenhouse gases in the atmosphere by burning fossil fuels such as coal, natural gas, oil and gasoline to power our cars, factories, utilities and appliances. The added gases — primarily carbon dioxide and methane — are enhancing the natural greenhouse effect, and likely contributing to an increase in global average temperature and related climate changes. Although methane is emitted from both natural and anthropogenic sources, underground coal mines are the largest source of coal mine methane. The International Panel on Climate Change (IPCC) developed the Global Warming Potential (GWP) concept to compare the ability of each greenhouse gas to trap heat in the atmosphere relative to the reference gas, carbon dioxide. Therefore other types of greenhouse gas emissions are measured in terms of the amount of CO₂ that would have an equivalent amount of GWP.

or sale, thus preventing its release into the atmosphere. In 2008, thirteen active underground mines with methane capture projects operating throughout the United States prevented 37 billion cubic feet of methane from entering the atmosphere, thereby offsetting almost 15 million metric tons of carbon dioxide-equivalent (MMTCO₂e). In most cases, the potential for greenhouse gas emission reductions from coal mining projects would be significant. Therefore, EPA recommends that UDOGM/OSM consider actions the agencies could take to legally capture this methane.

Future annual reports could disclose the projected annual and total project lifetime cumulative GHG emissions, in CO₂ equivalent terms, for the methane emissions associated with the mining of federal or state coal and any adjacent private coal, as well as any other related direct or indirect GHG emissions. It may be helpful to translate the GHG emissions into equivalencies that are easily understood from the public standpoint² and to provide a comparison to GHG emissions from other, similar proposals or actions; and to provide a comparison of Utah's annual emissions to annual emissions at western regional, national, and global scales.

Along with the suggestions expressed in this letter comes a commitment from EPA to work with you and your staff in improving the coal regulatory program. We would welcome the opportunity to meet with you to discuss any concerns. If you have any questions about our letter, please contact me at (303)312-6004 or James Hanley, our mining engineer, at (303)312-6725 or hanley.james@epa.gov.

Sincerely,



Larry Svoboda
Director, NEPA Program
Office of Environmental Protection and Remediation

² See, <http://www.epa.gov/RDEE/energy-resources/calculator.html>

