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TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

November 5, 2007

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TO: Internal File

THRU: Pamela Grubaugh-Littig, Permit Supervisor *pgl*

FROM: Wayne H. Western, Team Lead *w'hw'*

RE: Reduction of Subsidence Monitoring, Canyon Fuel Company LLC, Skyline Mine, Permit C/007/0005 and Task # 2875

SUMMARY:

On October 30, 2007, the Division received amendment 2875, Reduction of Subsidence Monitoring from the Permittee. The Permittee requested that the Division grant approval to eliminate subsidence monitoring in panels 3R-7R and 1R NM-6R NM and for Mines #1 and #2. This memo deals with the engineering aspects of the amendment.

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TECHNICAL ANALYSIS:

OPERATION PLAN

SUBSIDENCE CONTROL PLAN

Regulatory Reference: 30 CFR 784.20, 817.121, 817.122; R645-301-521, -301-525, -301-724.

Analysis:

Subsidence Control Plan

The Permittee did not meet the requirements of this section. In Section 4.17.9 Reduction for Subsidence Monitoring Program, on page 4-101 of the amendment, the Permittee states in reference to Mine No. 3 that no adverse effects related to subsidence were observed after 1997. Other claims of no adverse effects related to Mine No. 1 and Mine No. 2 were also made.

The Permittee needs to include:

- References or supporting data to show that no adverse impacts were made to the area of Mine No. 1 since 1997 and that no adverse impacts occurred in the area of the other mines.
- A description of the effects of subsidence and how they were mitigated.
- The amount of subsidence, when it commenced and when it ended and if there were any anomalies.

Findings:

The information provided in the proposed amendment is not considered adequate to meet the requirements of this section. Before approval, the Permittee must provide the following in accordance with:

R645-301-122, The Permittee must reference the material that they used to make the conclusions that • that no adverse impacts were made to the area of Mine No. 1 since 1997 and that no adverse impacts occurred in the area of the other mines • the effects of subsidence and how they were mitigated • the amount of subsidence, when it commenced and when it ended and if there were any anomalies

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RECOMMENDATIONS:

The Division should deny the amendment until all of the above mention deficiencies have been addressed.

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