

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

March 25, 2008

TO: Internal File

THRU: James D. Smith, Permit Supervisor *JS 05/01/08*
Dana Dean, Team Lead

FROM: Wayne H. Western, Team Lead *WHW*

RE: Reduction of Subsidence Monitoring, Canyon Fuel Company LLC, Skyline Mine,
Skyline Mine and Task # 2942 *00070005*

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.

On March 6, 2008, the Permittee provided the Division with additional information.

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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 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 Division in consultation with the USFS determined that no additional subsidence monitoring would be needed in those areas.

Findings:

The information provided in the proposed amendment is considered adequate to meet the requirements of this section.

RECOMMENDATIONS:

The Division should approve amendment.