

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

June 4, 2012

TO: Internal File

THRU: Priscilla Burton, Lead *PWB km SAS*

FROM: James Owen, Engineer *JO*

RE: CIR Monitoring Reduction, Canyon Fuel Company, Skyline Mine, C/007/005,
Task # 4096

SUMMARY:

On May 14, 2012, the Utah Division of Oil Gas & Mining received an application for an amendment to the Mining & Reclamation Plan (MRP) of the Skyline Mine. The application seeks approval to terminate the collection of Color Infrared photographic monitoring (CIR) currently being conducted in conjunction with Skyline Mine's annual Subsidence survey

This memo addresses the application's compliance with the engineering (R645-301-500) section of the Utah Coal Mining Rules. Contents and information provided are sufficient enough to meet the minimum requirements of this section of the Utah Coal Mining Rules.

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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:

As one method to monitor the impacts of subsidence, Skyline has a commitment to review year-to-year color infrared (CIR) aerial photographs of the areas that have been recently mined within their permit area

A comprehensive review of the CIR data collected annually from 2005 through 2011 was evaluated by Dr. Patrick Collins of Mt. Nebo Scientific, Inc. The review determined no adverse impact had been observed in the data. The application seeks to replace Section 4.17; page 4-99.

Findings:

Contents and information provided are sufficient enough to meet the minimum requirements of this section of the Utah Coal Mining Rules.

RECOMMENDATIONS:

Approval is recommended at this time.