

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

July 31, 2012

TO: Internal File

THRU: Priscilla Burton, Lead

FROM: James Owen, Engineer *JEO*

RE: Equipment Abandonment, Canyon Fuel Company, Skyline Mine, C/007/0005,
Task #4149

SUMMARY:

On July 11, 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 abandon 167 pieces of armored face conveyor in an area that is being sealed. The components are reported to be 100 percent steel with no associated fluids or other components.

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

MINING OPERATIONS AND FACILITIES

Regulatory Reference: 30 CFR 784.2, 784.11; R645-301-231, -301-526, -301-528.

Analysis:

Section 2.5.2 of the currently approved MRP addresses the abandonment of equipment. Section 2.5.2 (page 2-51c) currently references metallurgical studies cited by the BLM, and provides a discussion outlining the insignificance of abandoning steel underground.

Findings:

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

SPOIL AND WASTE MATERIALS

Regulatory Reference: 30 CFR Sec. 701.5, 784.19, 784.25, 817.71, 817.72, 817.73, 817.74, 817.81, 817.83, 817.84, 817.87, 817.89; R645-100-200, -301-210, -301-211, -301-212, -301-412, -301-512, -301-513, -301-514, -301-521, -301-526, -301-528, -301-535, -301-536, -301-542, -301-553, -301-745, -301-746, -301-747.

Analysis:

Abandoning equipment is allowed by Utah Rules if it is done in accordance with R-645-301.542.741. The proposed abandonment will be in an area that will not affect stability of reclamation activities or cause issues with revegetation as it will not be near the surface.

Due to the fact that the equipment to be abandoned has been removed of all fluids, electronics, batteries, etc. and that emulsion has been diluted, there appears to be no potential for contamination issues.

Findings:

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

MAPS, PLANS, AND CROSS SECTIONS OF MINING OPERATIONS

Regulatory Reference: 30 CFR Sec. 784.23; R645-301-512, -301-521, -301-542, -301-632, -301-731, -302-323.

Analysis:

Plate 2.5.2-1; Mine 3 Levels 2&3 Abandoned Mining Equipment Locations, has been modified to include the equipment currently proposed for abandonment. The applicant will submit copy of the map in the 2012 Annual report.

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.