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TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

January 7, 2013

TO: Internal File

THRU: Priscilla Burton, Lead *PB m SOS*

FROM: April A. Abate, Environmental Scientist III *aaa*
2/4/13

RE: North Lease Permit Modification, Canyon Fuel Company, Skyline Mine, Permit C/007/0005, Task ID #4208

SUMMARY:

On November 16, 2012, the Utah Division of Oil Gas & Mining received an electronic response to the deficiency letter issued for the significant revision amendment to extend the Skyline Mine North Lease area approximately 770.52 acres.

The following two deficiencies were previously identified with the application's compliance with the geology (R645-301-600) section of the Utah Coal Mining Rules:

[R645-301.632]: Please add information to Section 2.2 of the MRP referencing subsidence monitoring studies performed at the mine. Currently no information referring to subsidence monitoring exists in Section 2.2 of the MRP. This information should reference all subsidence studies performed in the permit area. Adding a reference to this information in Section 2.2 to where this information is included elsewhere in the MRP is acceptable.

[R645-301.642]: Please include the commitment to reclaim any monuments and/or surface markers used as subsidence monitoring points.

The Permittee submitted a response to both deficiencies and included the necessary information under Section 2.2.13 and on page 4-98 of Section 4.17. This information satisfies the compliance requirements of the Utah Coal Mining Rules.

RECOMMENDATIONS:

Approval is recommended.

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TECHNICAL ANALYSIS:

Subsidence Monitoring

According to rules R645-301.632 require information referencing subsidence monitoring and a determination of the commencement and degree of subsidence in the context of analyzing measures required to prevent or reduce material damage inside the permit area. The Permittee has provided Map 4.17.3-1A depicting the North Lease pre-subsidence survey information and map 4.17.5-1 depicting subsidence monitoring points. Under the performance standard rule 642 the Permittee is required to provide a commitment to reclaim any monument or surface marker used as a subsidence monitoring point.

The Permittee added Section 2.2.13 to the Geology and Geotechnical section of the Mining and Reclamation Plan (MRP). Page 2-21(b) contains a reference to the Subsidence Monitoring Plan in Section 4.17.

On page 4-98 of the Subsidence Control Plan found in Section 4.17, the Permittee references subsidence markings comprised of rebar and biodegradable white sheeting. The Permittee added a commitment to reclaim the markers at the completion of the project as necessary.

Findings:

The Permittee submitted a response to both deficiencies and included the necessary information under Section 2.2.13 and on page 4-98 of Section 4.17. This information satisfies the compliance requirements of the Utah Coal Mining Rules.

RECOMMENDATIONS:

Approval is recommended.