

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

December 7, 2006

JK

TO: Internal File

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

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

RE: Reformat Chapter 5 and Update Subsidence, Hiawatha Complex, Hiawatha Coal Company, Permit C/007/0011, Task ID #2704

SUMMARY:

On November 22, 2006, the Division received an application for the Hiawatha Mine to modify Chapter 5. The revisions consisted of a change in the subsidence monitoring plan, name changes to reflect the current Permittee and formatting changes.

TECHNICAL MEMO

TECHNICAL ANALYSIS:

OPERATION PLAN

MINING OPERATIONS AND FACILITIES

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

Analysis:

The Permittee replaced the name of the old permittee with the name of the current permittee to avoid confusion. The Permittee also reformatted Chapter 5 when they converted from WordPerfect.

Findings:

The Permittee met the minimum requirements at of this section.

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 minimum requirements for this section. The Permittee must include a detailed description of the subsidence-monitoring program. The Division contacted the Permittee by phone on December 7, 2006; in the conversation, Wayne Western was told by Mark Reynolds that they would do monitoring with a GPS unit.

The Permittee must also provide the Division with a subsidence map as part of the annual report. The Division needs a subsidence map to readily analysis as present the data.

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:

R645-301-525.490, The Permittee must commit to include a subsidence map in the annual report that shows the location and the amount of subsidence. The Division needs the subsidence map to quickly analysis and present the subsidence data.

R645-301-525.440, The Permittee must include a detailed description of the monitoring plan. The Division understands that the Permittee wants to switch from aerial surveying to terrestrial surveying with GPS units.

RECOMMENDATIONS:

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