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TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

January 30, 2007

TO: Internal File

THRU: Pamela Grubaugh-Littig, Permit Supervisor

FROM: Wayne H. Western, Team Lead

RE: Reformat Chapter 5 and Update Subsidence, Hiawatha Complex, Hiawatha Coal Company, Permit C/007/0011, Task ID #2740

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 Permittee needs to include subsidence isopachs on the subsidence map. The Division needs the information to quickly analysis and present the subsidence data.

R645-301-525.440, The Permittee must include a detailed description of the monitoring plan. The detailed monitoring plan must include information about the number and location of the subsidence monitoring stations and the accuracy of the survey. For example, the Permittee must show the location of subsidence monitoring points on the subsidence map. The subsidence monitoring points must provide enough coverage so that accurate subsidence data can be obtained. The Permittee must also state the accuracy of the GPS unit.

RECOMMENDATIONS:

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