

## Technical Analysis and Findings

### Utah Coal Regulatory Program

January 4, 2018

**PID:** C0070013  
**TaskID:** 5569  
**Mine Name:** HORSE CANYON MINE  
**Title:** NEW STORAGE PAD/NEW BLM ROW

### Reclamation Plan

#### Bonding and Insurance General

*Analysis:*

The amendment meets the State of Utah R645 requirements for General Bonding and Insurance.

Previous deficiencies written in regard to this amendment dealt with the reclamation bond being inadequate and not addressing the costs of reclaiming the additional acreage associated with the newly proposed storage pad. The previous amendment submittal (Task # 5556) identified three bonding items that have since been addressed and now fulfill the State of Utah R645 requirements for General Bonding and Insurance. Specifically, those items were identified as follows:

- Previous bonds allocated \$26,537 dollars for the cost of reclaiming the Graben Breakout, a cost that was notably absent from the bond in the last submittal (Task# 5556). A meeting with Richard White on December 12 revealed that this item had been removed from the bonding sheets because the Graben Breakout was never built.
- The revegetation section of the bond committed to reclaiming 32.94 acres of disturbed land even though the latest surveys confirmed that the actual disturbed acreage should be 37.02 acres including the areas associated with the new storage pad. The bond has since been increased to include the 37.02 acres of actual disturbance.
- Previous bonding calculations were riddled with cost estimation bids from Scamp Excavation Inc., but no supporting documentation was included in the submittal. This amendment comes with documentation from Scamp verifying the cost quotes cited in the bond.

The above items were addressed to the satisfaction of the Division, and currently comply with the State of Utah R645 requirements.