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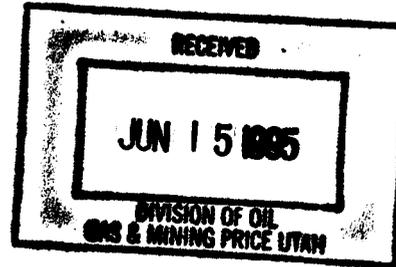


ANDALEX
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ACT 007/019
#2

June 15, 1995



State of Utah
Department of Natural Resources
Division of Oil, Gas & Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

Attn: Daron Haddock, Permit Supervisor

Copy Daron

Re: ACT 007/019, Reformatted Plan and Mid-Term Review Response

Dear Mr. Haddock: *#2*

Enclosed are three (3) copies each of revised maps and text as outlined by the requirement section of the Technical Analysis. In cases where information required by the section has already been submitted, I have described its location in the following summary.

Due to the number of changes required by the Division's Technical Analysis, rather than attempting to make changes for page-by-page insertions the entire reformatted plan has been reprinted and submitted. Please note that pages numbers of this new MRP will not correspond exactly to the previous reformatted submittal.

PERMIT APPLICATION:

- 1) The right-of-way to the Aberdeen Seam and fan portal (U-64158) is shown on Plate 4.

Identification of Interests:

- 1) See 111.200.
- 2) See 112.310. Officers and directors of Andalex Resources B.V. are the officers and directors of Andalex Resources, Inc. as shown in 112.310. There are no other companies, I.D. numbers, officers or directors.
- 3) See 112.500. This text agrees with Plates 2 & 3.

State of Utah
Department of Natural Resources
Division of Oil, Gas & Mining
Attn: Daron Haddock
June 15, 1995
Page Two

- 4) Attached is the previous five-year nationwide violation information for Andalex. This should replace any existing violation information in Appendix B. This is the most current information. Attachment I-6 may also be included in Appendix B. (enclosed)
- 5) Acreage figures in various parts of the plan are correct.

6) See Plate 4.

Unsuitability Claims:

- 1) See 301-115.

Permit Term, etc.:

- 1) See 117.200.
- 2) Reference to UMC has been eliminated.
- 3) See 301-123. and final page of reformatted MRP.
- 4) There were no coal mining or reclamation operations by Andalex prior to 1980. Any previously existing disturbed areas are within Andalex's disturbed area and are part of its final reclamation plan.
- 5) These references have been corrected.

RESOURCE INFORMATION:

Historic and Archaeological Resources:

- 1) See 411.140. Appropriately, the information has been deleted as instructed. Reference Appendix C.
- 2) See 411.141, 411.142, 411.143, 411.144, 411.145. Reference Appendix C.
- 3) See 411.141, 411.142, 411.143, 411.144, 411.145. Reference Appendix C.

State of Utah
Department of Natural Resources
Division of Oil, Gas & Mining
Attn: Daron Haddock
June 15, 1995
Page Three

Fish and Wildlife Resources:

- 1) See Plate 34.
- 2) See 301-310. and Appendix A.

Soil Resource Information:

- 1) Samples have been taken of the two substitute topsoil areas and will be included in Appendix M. (results have not been received)
- 2) See Plate 6.

Land-Use Resources:

- 1) See 411.230.

Geologic Resources:

- 1) See 611.200.
- 2) References have been changed.
- 3) References to Figure III-3 have been removed.
- 4) See Appendix E for two missing logs.
- 5) Drill hole information is proprietary to Cyprus/Amax.
- 6) References have been changed to correspond with the new format.
- 7) See 624.340.

Hydrologic Resources:

- 1) See 711.300.
- 2) A detailed PHC on the AEP lease was performed and submitted to the Division. See Appendix L.
- 3) See 711.300.

State of Utah
Department of Natural Resources
Division of Oil, Gas & Mining
Attn: Daron Haddock
June 15, 1995
Page Four

Maps, Plans and Cross Sections:

- 1) All necessary certifications are made.
- 2) See Plates 26, 27, 28 and 29.
- 3) See Plates 26, 27, 28 and 29.
- 4) See Plates 26, 27, 28 and 29.
- 5) See Figure IV and Appendix L.
- 6) See 711.500. and Figure IV-11.
- 7) Andalex believes Plate 15 adequately satisfies this requirement.
- 8) Andalex maintains there are no aquifers of any areal or vertical extent within or adjacent to the permit area. All aquifers are perched and are not mappable.
- 9) There are none within proposed permit or adjacent areas.

OPERATIONAL PLAN:

General Operational Plan:

- 1) See 512.240.
- 2) Regarding 528.300, spoil, coal processing waste, mine development waste, and non-coal waste are not used in dams, embankments, or other impoundments by Andalex.

Existing Structures:

- 1) See Plate 6 for existing structures.

Coal Recovery:

- 1) See the Resource Recovery and Protection Plan (R2P2) on file with BLM % Price River Resource Area, 900 North 700 East, Price, Utah 84501. This document is considered proprietary.

State of Utah
Department of Natural Resources
Division of Oil, Gas & Mining
Attn: Daron Haddock
June 15, 1995
Page Five

Subsidence Control:

- 1) See 724.600.
- 2) See 724.600.

Slide and Other Damage:

- 1) See 301-531.

Fish and Wildlife:

- 1) See 301-310.
- 2) Incorrect references have been corrected.

Interim Stabilization of Disturbed Areas:

- 1) See 515.100.

Maps, Plans and Cross Sections:

- 1) See 301-512.
- 2) Road remains. See 541.300 (1).
- 3) See Figure IV-11.

Topsoil and Subsoil Operations Plans:

- 1) See 301-224.
- 2) Plate 37 is currently being redrawn for legibility. The plate will include information pertaining to topsoil protection.

Road Systems:

- 1) See 301-142.
- 2) See 512.250.
- 3) See 301-142.
- 4) The geotechnical analysis described at R645-301-527.250 is not required.

State of Utah
Department of Natural Resources
Division of Oil, Gas & Mining
Attn: Daron Haddock
June 15, 1995
Page Six

- 5) The main road through the minesite will be left as part of the post-mining land use. All other roads will be reclaimed including steep slopes in accordance with the reclamation plan outlined in 535.410.

Spoil and Waste:

- 1) See 512.230.
- 2) See 512.230.
- 3) See 512.230.
- 4) The approval for the construction of the Left Hand Fork fan was received May 25, 1995. A survey of all eagle nests within the permit area, including the nest nearby the fan installation, was conducted May 24, 1995 with personnel from the Utah Division of Wildlife Resources. It was determined that all nests were inactive this season. Construction of the Left Hand Fork fan installation will commence shortly.
- 5) See 529.100.
- 6) Reference to lump coal has been removed from the plan.

Hydrologic:

- 1) See 711.300.
- 2) See 731.510.
- 3) References to 731.300 were not found.

RECLAMATION PLAN:

General Reclamation Plan:

- 1) See 301-551.

Post-Mining Land Use:

- 1) See reclamation plan outlined in 535.410. Also, it should be noted that the main road through the minesite will be left intact as part of the post-mining land use.

State of Utah
Department of Natural Resources
Division of Oil, Gas & Mining
Attn: Daron Haddock
June 15, 1995
Page Seven

- 2) Water monitoring in 413.320 has been eliminated as it is compliance-related to the operational plan and not the reclamation plan.

Topsoil Redistribution:

- 1) Acreage has been adjusted.

Geologic:

- 1) See 525.170.
- 2) Information in Part 600 which deals with casing and sealing of exploration holes is currently referenced to 301-551. Other references to 301-525 are referring to subsidence-related issues and other references to 611.100 pertain to specific geologic information. Also, references to Appendix E relate to specific drilling information. Andalex believe these are referenced appropriately.

Reclamation Hydrology:

- 1) See 711.500., 711.300, & 724.400

Revegetation:

- 1) See 301-331.
- 2) See 341.210.
- 3) Reference to 817.97(d)(7) has been removed.
- 4) See 301-240, Reclamation Time Table, Phase I.
- 5) See 301-240. and 301-331., Reclamation Time Table, Phase I.
- 6) Section 353.100 to 353.250 has been added.
- 7) Andalex believes that reclamation of the site is the equivalent of wildlife enhancement as revegetation which will support post-mining land use (wildlife) will be established.

State of Utah
Department of Natural Resources
Division of Oil, Gas & Mining
Attn: Daron Haddock
June 15, 1995
Page Eight

Additional Division Recommendations:

- 1) Surface roughness has been established as important for revegetation success. Andalex will make every effort to leave surfaces as rough as possible. See 301-331.
- 2) See 301-331, Mulching Techniques.
- 3) See 301-331, Reference Areas.

The above referenced information, along with revised and certified Plates, should adequately address the technical analysis findings of the Division of Oil, Gas and Mining. Please call with questions.

Sincerely,



Michael W. Glasson
Senior Geologist

Enclosures