

November 24, 2003

Mike Glasson, Environmental Coordinator
Andalex Resources, Inc.
P.O. Box 902
Price, Utah 84501

Re: Conditional Approval of Ditch Amendment, Andalex Resources, Inc.,
Centennial Project, C/007/0019, Task ID #1755, Outgoing File

Dear Mr. Glasson:

The above-referenced amendment is conditionally approved upon receipt of five clean copies prepared for incorporation. Please submit these copies by December 12, 2003. Once we receive these copies, final approval will be granted, at which time you may proceed with your plans.

A stamped incorporated copy of the approved plan will also be returned to you at that time, for insertion into your copy of the Mining and Reclamation Plan. A copy of our Technical Analysis is enclosed.

If you have any questions, please call me at (801) 538-5325 or Gregg Galecki at (801) 538-5260.

Sincerely,

Daron R. Haddock
Permit Supervisor

an
Enclosure
cc: Price Field Office
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State of Utah



Utah Oil Gas and Mining

Coal Regulatory Program

Centennial Project
Ditch Amendment
C/007/0019, Task ID #1755
Technical Analysis
November 21, 2003

TECHNICAL ANALYSIS

The Division ensures compliance with the Surface Mining Control and Reclamation Act of 1977(SMCRA). When mines submit a Permit Application Package or an amendment to their Mining and Reclamation Plan, the Division reviews the proposal for conformance to the R645-Coal Mining Rules. This Technical Analysis is such a review. Regardless of these analyses, the permittee must comply with the minimum regulatory requirements as established by SMCRA.

Readers of this document must be aware that the regulatory requirements are included by reference. A complete and current copy of these regulations and a copy of the Technical Analysis and Findings Review Guide can be found at <http://ogm.utah.gov/coal>

This Technical Analysis (TA) is written as part of the permit review process. It documents the Findings that the Division has made to date regarding the application for a permit and is the basis for permitting decisions with regard to the application. The TA is broken down into logical section headings, which comprise the necessary components of an application. Each section is analyzed and specific findings are then provided which indicate whether or not the application is in compliance with the requirements.

Often the first technical review of an application finds that the application contains some deficiencies. The deficiencies are discussed in the body of the TA and are identified by a regulatory reference, which describes the minimum requirements. In this Technical Analysis we have summarized the deficiencies at the beginning of the document to aid in responding to them. Once all of the deficiencies have been adequately addressed, the TA will be considered final for the permitting action.

It may be that not every topic or regulatory requirement is discussed in this version of the TA. Generally only those sections are analyzed that pertain to a particular permitting action. TA's may have been completed previously and the revised information has not altered the original findings. Those sections that are not discussed in this document are generally considered to be in compliance.

INTRODUCTION

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On October 20, 2003, the Division received a proposed amendment to eliminate disturbed area ditch DD-5 from the Mine Plan (MRP). The ditch is no longer functioning as designed, however the flow from the area is being transported in an alternate controlled manner. The proposed change has no impact to downstream culverts or hydrologic structures and requires no sizing modifications. Modifications have been made to tables and maps within the currently approved MRP to reflect the changes. The current technical review addresses the regulations solely germane to a hydrologic perspective. The proposed changes adequately address the minimum requirements of the regulations and incorporation into the currently approved MRP is recommended.

OPERATION PLAN

HYDROLOGIC INFORMATION

Regulatory Reference: 30 CFR Sec. 773.17, 774.13, 784.14, 784.16, 784.29, 817.41, 817.42, 817.43, 817.45, 817.49, 817.56, 817.57; R645-300-140, -300-141, -300-142, -300-143, -300-144, -300-145, -300-146, -300-147, -300-147, -300-148, -301-512, -301-514, -301-521, -301-531, -301-532, -301-533, -301-536, -301-542, -301-720, -301-731, -301-732, -301-733, -301-742, -301-743, -301-750, -301-761, -301-764.

Analysis:

Diversions: General

Ditch DD-5 was originally designed to convey runoff from an undisturbed area of approximately 6.2-acres into ditch DD-6 and ultimately into Sediment Pond E prior to leaving the mine site. Ditch DD-5 is at the base of a very rock steep slope and immediately adjacent to a paved road accessing the Administrative Office area of the mine. Maintenance of the ditch has been a problem due to colluvium coming off the steep slope. Sediment- and runoff- control is addressed by flow running through the colluvium located at the shoulder of the road or 'washboarding' over a portion of the road surface and reporting to ditch DD-6 either through the existing culvert or directly to the ditch.

The elimination of ditch DD-5 does not add any additional flow, sediment, or increased velocities of waters received from the area by ditch DD-6. Water that was initially designed to report totally to culvert CD-5 is now reporting between the culvert inlet, culvert outlet, and a small section of well-vegetated slope coming off the shoulder of the road. All of which is captured by ditch DD-6.

Modifications to the MRP include the elimination of ditch DD-5 from Table IV-3A, -3B, and -3C (Disturbed Diversion Design, Diversion Ditch Summary, and Disturbed Area Culvert Design Tables, respectively), located on pages 5-77, 5-78, and 5-81 of the MRP.

Findings:

The information provided in the application adequately addresses the minimum requirements of the Operation Plan - Hydrologic Information section of the regulations.

MAPS, PLANS, AND CROSS SECTIONS OF MINING OPERATIONS

Regulatory Reference: 30 CFR Sec. 784.23; R645-301-512, -301-521, -301-542, -301-632, -301-731, -302-323.

Analysis:

Mining Facilities Maps

Included in the proposed changes are modifications to Plate 6 – As Constructed Surface Facilities Map and Plate 8 – Support Facilities Surface Area Drainage Map that eliminate the existence of ditch DD-5. No other mapping modifications were conducted and no other mapping modifications were requested by the Division.

Findings:

The information provided in the application adequately addresses the minimum requirements of the Operation Plan – Maps, Plans, and Cross Sections of Mining Operations section of the regulations.