

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

June 16, 2004

OK

TO: Internal File
THRU: ~~Dave Darby~~, Team Lead *Greg Galack* *AA*
FROM: Wayne H. Western, Environmental Scientist III, Engineering and Bonding *WHW*
RE: Incidental Boundary Change, Andalex Resources Inc. Centennial Project Mine Permit # C/007/0019, Task ID# 1919

SUMMARY:

On May 7, 2004, the Division received an amendment for the addition of 93.32 acres as an incidental boundary change (IBC.) The IBC contains 20- acres from the Mathis Tract and 72.32acers from the Federal Summit Creek Lease.

The coal in the IBC is located beneath 2,600 to 3,000 ft of cover. Surface effects such as subsidence should be negligible. Andalex Resources Inc. (ARI) will not add any additional surface facilities for the IBC.

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TECHNICAL ANALYSIS:

OPERATION PLAN

MINING OPERATIONS AND FACILITIES

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

Analysis:

ARI proposed to add 93.32 acres as an ^{IBC} ICB to the Aberdeen Mine. They needed to add the IBC to accommodate a new longwall panel setup. The ICB would not significantly change the mine plan. There are no surface facilities associated with the ~~ICB~~.
IBC

Findings:

The information submitted in the PAP meet the minimum requirements of this section of the regulations.

EXISTING STRUCTURES:

Regulatory Reference: 30 CFR 784.12; R645-301-526.

Analysis:

There are no existing structures associated with the IBC.

Findings:

The information submitted in the PAP meet the minimum requirements of this section of the regulations.

RELOCATION OR USE OF PUBLIC ROADS

Regulatory Reference: 30 CFR 784.18; R645-301-521, -301-526.

Analysis:

There are no public roads associated with the IBC.

Findings:

The information submitted in the PAP meet the minimum requirements of this section of the regulations.

COAL RECOVERY

Regulatory Reference: 30 CFR 817.59; R645-301-522.

Analysis:

ARI needs the ^{IBC}FCB in order to set up the longwall panels so that they can increase coal production. The coal that will be recovered is a depth of 2,600 to 3,000 ft. The ^{IBC}FCB will not decrease the amount of coal the ARI would recover. ^{IBC}

Findings:

The information submitted in the PAP meet the minimum requirements of this section of the regulations.

SUBSIDENCE CONTROL PLAN

Regulatory Reference: 30 CFR 784.20, 817.121, 817.122; R645-301-521, -301-525, -301-724.

Analysis:

The existing subsidence control plan is sufficient to handle the IBC. The addition of 93.32 acres would not have a significant impact on subsidence.

Findings:

The information submitted in the PAP meet the minimum requirements of this section of the regulations.

ROAD SYSTEMS AND OTHER TRANSPORTATION FACILITIES

Regulatory Reference: 30 CFR Sec. 784.24, 817.150, 817.151; R645-301-521, -301-527, -301-534, -301-732.

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Analysis:

No new roads are associated with the IBC.

Findings:

The information submitted in the PAP meet the minimum requirements of this section of the regulations.

SPOIL AND WASTE MATERIALS

Regulatory Reference: 30 CFR Sec. 701.5, 784.19, 784.25, 817.71, 817.72, 817.73, 817.74, 817.81, 817.83, 817.84, 817.87, 817.89; R645-100-200, -301-210, -301-211, -301-212, -301-412, -301-512, -301-513, -301-514, -301-521, -301-526, -301-528, -301-535, -301-536, -301-542, -301-553, -301-745, -301-746, -301-747.

Analysis:

The IBC will not alter the existing spoil and waste materials program.

Findings:

The information submitted in the PAP meet the minimum requirements of this section of the regulations.

SUPPORT FACILITIES AND UTILITY INSTALLATIONS

Regulatory Reference: 30 CFR Sec. 784.30, 817.180, 817.181; R645-301-526.

Analysis:

ARI will not construct any new surface facilities.

Findings:

The information submitted in the PAP meet the minimum requirements of this section of the regulations.

USE OF EXPLOSIVES

Regulatory Reference: 30 CFR Sec. 817.61, 817.62, 817.64, 817.66, 817.67, 817.68; R645-301-524.

Analysis:

There are not surface explosions associated with the IBC.

Findings:

The information submitted in the PAP meet the minimum requirements of this 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:

Affected Area Maps

ARI showed the new permit boundaries on Plate I. However, ARI did not clearly show the new permit boundaries on several maps including Plate 21, Plate 22, Plate 25, Plate 29, Plate 34, Figure 4, Figure 5 and Figure 6. At a minimum the permit boundary lines should all be of the same line type and width. If ARI does not want to change the line type then they must note the change on the maps.

Mine Workings Maps

The existing and projected mine working map for the Aberdeen Seem, Aberdeen Mine, are show on Plate 29. R645-301-512.110 requires that the mine workings maps be certified by a registered professional engineer. Dan Guy certified the original Plate 29 but the map was not certified when it was revised on May 5, 2004.

Certification Requirements

Plate 25 was certified on July 18, 1998. On April 20, 2004, Plate 25 was modified by not re-certified. While the subsidence maps are not required certification, the P.E. stamp suggests that the map and all the revisions were approved by a P.E.

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Findings:

The information in the amendment is not adequate to meet the minimum requirements of this section of the regulations. Before the Division can approve the amendment ARI must provide the Division with the following in accordance with:

R645-301-512, R645-301-512.110, ARI must have the changes on Plate 29 and all other maps that fall under R645-301-512 certified by a registered professional engineer. Either maps that were certified by not required to be certified under R645-301-512 but were modified must be re-certified or ARI must state what changes were made after certification.

RECLAMATION PLAN

GENERAL REQUIREMENTS

Regulatory Reference: PL 95-87 Sec. 515 and 516; 30 CFR Sec. 784.13, 784.14, 784.15, 784.16, 784.17, 784.18, 784.19, 784.20, 784.21, 784.22, 784.23, 784.24, 784.25, 784.26; R645-301-231, -301-233, -301-322, -301-323, -301-331, -301-333, -301-341, -301-342, -301-411, -301-412, -301-422, -301-512, -301-513, -301-521, -301-522, -301-525, -301-526, -301-527, -301-528, -301-529, -301-531, -301-533, -301-534, -301-536, -301-537, -301-542, -301-623, -301-624, -301-625, -301-626, -301-631, -301-632, -301-731, -301-723, -301-724, -301-725, -301-726, -301-728, -301-729, -301-731, -301-732, -301-733, -301-746, -301-764, -301-830.

Analysis:

Since there are no surface facilities associated with the addition of 93.32 acres, no changes to the engineering portion of the reclamation plan are needed.

Findings:

The information submitted in the PAP meet the minimum requirements of this section of the regulations.

BONDING AND INSURANCE REQUIREMENTS

Regulatory Reference: 30 CFR Sec. 800; R645-301-800, et seq.

Analysis:

Determination of Bond Amount

Because no changes to the surface facilities will result as a result of the addition of 93.32 acres for an incidental boundary change there is no change in the reclamation cost estimate.

Terms and Conditions for Liability Insurance

Findings:

The information submitted in the PAP meet the minimum requirements of this section of the regulations.

RECOMMENDATIONS:

The Division should deny the amendment until ARI adequately address the above-mentioned deficiencies.