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ANDALEX
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Utah Division of Oil, Gas & Mining
Coal Program
1594 West North Temple, Suite 1210
Box 145801
Salt Lake City, Utah 84114-5801

*Incoming
C/007/0019
#2263*

Attn: D. Wayne Hedberg, Permit Supervisor

Re: Mathis/Summit Creek Boundary Change Centennial Project C/007/0019, Task #2119

Dear Mr. Hedberg:

Enclosed are 5 copies of the Andalex Resources, Inc. response to the Technical Deficiencies for the Mathis/Summit Creek Boundary Change listed in your letter of April 29, 2005.

Also enclosed is a checklist to assist in the review of the deficiencies, and a C₁/C₂ Form.

If you have any questions, or need additional information, please let me know.

Sincerely,

Michael W. Glasson, P.G.
Environmental Coordinator

file In C 0070019 Incoming
Date: 05272005 Refer to:

Confidential
 Shelf
 Expandable
For additional information

RECEIVED

MAY 27 2005

DIV. OF OIL, GAS & MINING

**CHECKLIST
FOR DEFICIENCIES**

R645-301-114, A copy of the State L.B.A. needs to be submitted for review upon approval and receipt of the lease. A copy of this lease needs to be incorporated into Appendix J. (KRH)

A copy of the State L.B.A. will be submitted upon approval and incorporated into Appendix J.

R645-301-115, An accurate legal description needs to be submitted for the proposed expansion. The lots listed in the description need to be shown on a map. (KRH)

See new Plate 1B; See also R645-301-114, p. 1-21.

R645-301-521.190, The Permittee must include a legal description of the permit area with subdivisions for federal, state and fee acreages in the text of the MRP. The description of the leases in Section R645-301-114 of the MRP is not adequate, because some of the leased area may not be part of the permit area. The Division needs that information for administrative reasons. (WHW)

R-645-301-114, New pages 1-21a, 1-21b, 1-21c.

R645-301-521.141 and R645-301-521.190, The Permittee must show the new permit and affected area boundaries. The Permittee must update the permit boundaries on all applicable maps, such as, but not limited to, Plate 1A, Plate 2 and Plate 3. (WHW)

Plate 25. Permit area is on all other plates.

R645-301-525.420 and R645-301-512.110, The Permittee must have Plate 25 certified by a registered professional engineer, the permit boundaries must be shown as if the revision had been approved (the expansion area should be noted) and the subsidence zone, 20 degree angle of draw, must be shown. In addition, the Permittee must provide a map that shows the subsidence zone for the entire project, not just for individual mines. (WHW)

Plate 25. Aberdeen is shown because it is by far the largest mine area.

R645-301-525.480, The Permittee must include 1) a narrative that describes how they will replace adversely affected State-appropriated water supplies; and 2) a plan to mitigate or remedy any subsidence-related material damage to the land. (WHW)

R645-301-525, pp.5-151, 5-151a.

R645-301-731.214, The Permittee is proposing to remove springs B351 and B352 from the monitoring plan and add springs B362 and B261. There is no evident reason for this change, and there are reasons for the Division to deny the change as it is presented. The Permittee needs to demonstrate, using the monitoring data, that adding B362 and B261 and dropping B351 and B352 will achieve the purposes set forth in the monitoring plan. (JDS)

There is no proposed change. See Figure IV-II, Figure 6, Peterson Report in Appendix L and I.B.C.

R645-301-731.530, There is no information related to R645-301-731.530 in the MRP. Section 731.800 of the MRP refers to Appendix L for information on Water Rights and Replacement. The PHC in Appendix L acknowledge the requirement to replace State-appropriated water supplies that have been diminished, contaminated, or interrupted, but there is no plan to carry out such replacement. The Permittee needs to provide a plan stating how it will replace state-appropriated water supplies if they are diminished, contaminated, or interrupted by underground coal mining activities conducted after October 24, 1992. (JDS)

R645-301-731.800, p. 7-36.

APPLICATION FOR PERMIT PROCESSING

<input checked="" type="checkbox"/> Permit Change	<input type="checkbox"/> New Permit	<input type="checkbox"/> Renewal	<input type="checkbox"/> Transfer	<input type="checkbox"/> Exploration	<input type="checkbox"/> Bond Release	Permit Number: ACT/007/019
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Title of Proposal: Response to T/A.	Mine: Centennial Project
Mathis/Summit Creek/State L.B.A. Boundary Change	Permittee: Andalex Resources

Description, include reason for application and timing required to implement: **To allow continued development.**

Instructions: If you answer yes to any of the first 8 questions (gray), submit the application to the Salt Lake Office. Otherwise, you may submit it to your reclamation

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	1. Change in the size of the Permit Area? 1090.21 acres Disturbed Area? 0 acres <input checked="" type="checkbox"/> increase <input type="checkbox"/> decrease
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	2. Is the application submitted as a result of a Division Order? DO #
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	3. Does application include operations outside a previously identified Cumulative Hydrologic Impact Area?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	4. Does application include operations in hydrologic basins other than as currently approved?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	5. Does application result from cancellation, reduction or increase of insurance or reclamation bond?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	6. Does the application require or include public notice/publication?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	7. Does the application require or include ownership, control, right-of-entry, or compliance information?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	8. Is proposed activity within 100 feet of a public road or cemetery or 300 feet of an occupied dwelling?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	9. Is the application submitted as a result of a Violation? NOV #
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	10. Is the application submitted as a result of other laws or regulations or policies? Explain: PERMIT CONDITION
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	11. Does the application affect the surface landowner or change the post mining land use?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	12. Does the application require or include underground design or mine sequence and timing? (Modification of R2P2?)
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	13. Does the application require or include collection and reporting of any baseline information?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	14. Could the application have any effect on wildlife or vegetation outside the current disturbed area?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	15. Does application require or include soil removal, storage or placement?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	16. Does the application require or include vegetation monitoring, removal or revegetation activities?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	17. Does the application require or include construction, modification, or removal of surface facilities?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	18. Does the application require or include water monitoring, sediment or drainage control measures?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	19. Does the application require or include certified designs, maps, or calculations?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	20. Does the application require or include subsidence control or monitoring?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	21. Have reclamation costs for bonding been provided for?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	22. Does application involve a perennial stream, a stream buffer zone or discharges to a stream?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	23. Does the application affect permits issued by other agencies or permits issued to other entities?

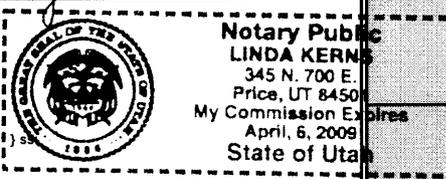
X Attach 5 complete copies of the application.

I hereby certify that I am a responsible official of the applicant and that the information contained in this application is true and correct to the best of my information and belief in all respects with the laws of Utah in reference to commitments, undertakings, and obligations, herein

Michelle K. Sabadogist
 Signed - Name - Position - Date 05/27/05

Subscribed and sworn to before me this 27th day of May, 2005.

Linda Kerns
 Notary Public
 My Commission Expires: April 6, 2009
 Attest: Utah
 COUNTY OF _____



Received by Oil, Gas & Mining
RECEIVED
 MAY 27 2005
 DIV. OF OIL, GAS & MINING
 ASSIGNED TRACKING NUMBER

