

# TECHNICAL MEMORANDUM

## Utah Coal Regulatory Program

December 20, 2005

TO: Internal File

THRU: Wayne Hedberg, Permit Supervisor  
Karl R. Houskeeper, Environmental Scientist III, Engineering

FROM: Karl R. Houskeeper, Environmental Scientist III/Team Lead

RE: Revised Appendix X and GVH #5A, #7, #8, #9, Andalex Resources, Inc., Centennial Mine, C/007/0019, Task ID #2359

### **SUMMARY:**

Andalex Resources Inc. submitted an amendment to the Division containing the revised Appendix X on October 20, 2005. The revised appendix contains as built information for previously installed gob vent holes GVH-1, GVH-3, GVH-4, GVH-5, and GVH-6. In addition, the amendment also contains information on four additional proposed holes, GVH-5A, GVH-7, GVH-8, and GVH-9. Supplemental information was received at the Price Field Office (PFO) on December 16, 2005. The supplemental information requests a change in the classification of roads to the pads from primary to ancillary roads. This memo addresses the engineering section of the amendment.

### **TECHNICAL ANALYSIS:**

## **OPERATION PLAN**

## **MINING OPERATIONS AND FACILITIES**

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

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### **Analysis:**

Methane de-gasification wells have been established from the surface above the longwall panels to aid in the dilution or reduction of the methane content that is vented out of the mine bleeder system. This amendment requests that gob vent holes (GVH) #5A, #7, #8, and #9 be permitted for future longwall panels. GVH #5A, #7, #8, and #9 are located above longwall panel #7. At present there are two gob vent holes already drilled above longwall panel #7, GVH #5, and #6.

### **Findings**

The minimum requirements of this section have been met.

## **EXISTING STRUCTURES:**

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

### **Analysis:**

There are no known dwellings, public buildings, schools, churches or community buildings within 1000 feet of the proposed well locations.

### **Findings:**

The minimum requirements of this section have been met.

## **RELOCATION OR USE OF PUBLIC ROADS**

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

### **Analysis:**

All access roads are considered to be private roads.

### **Findings:**

The minimum requirements of this section have been met.

## **AIR POLLUTION CONTROL PLAN**

Regulatory Reference: 30 CFR 784.26, 817.95; R645-301-244, -301-420.

### **Analysis:**

The plan already contains a commitment in section 424 to control fugitive dust from the access roads.

### **Findings:**

The minimum requirements of this section have been met.

## **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.

### **Analysis:**

#### **Road Classification System**

Information contained in the supplemental information submitted on December 16, 2005 changes the access roads to the gob vent holes from primary roads to ancillary roads because the roads are used infrequently. A commitment to maintain the roads is contained in the submittal.

Under 527.200, page 5-5, Description of Transportation Facilities a description of existing roads is given along with a typical cross section. This area needs further description such as the requirements listed in R645-301-527-210. The description needs to address road width, road surface, road cut, fill embankment, culverts, bridges, drainage ditches, and drainage structures. The appropriate information can easily be set up in tabular form to address each individual road. The submittal is silent as to the proposed roads to each gob vent hole. A description of each of these roads should be provided as well.

#### **Plans and Drawings**

A map showing the location of the roads should be included into the plan as part of the description.

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### **Primary Road Certification**

All roads associated with the gob vent holes are listed as ancillary roads; therefore, certification by a registered P.E. in the State of Utah is not required.

### **Findings:**

Information provided in the plan does not meet the minimum requirements of the regulations. Prior to approval, the Permittee must act in accordance with the following:

**R645-301-527.200 – 210**, A detailed description of each road (existing and proposed) should show the location on a map and a list of the roads in the plan. The description in the plan should address road width, road gradient, road surface, road cut, fill embankment, culvert, bridge, drainage ditch, and drainage structure. The road description in the plan needs to correlate to the map so that the roads can be easily identified between the plan and the map.

## **SIGNS AND MARKERS**

Regulatory Reference: 30 CFR Sec. 817.11; R645-301-521.

### **Analysis:**

A commitment to place an ID sign at each of the well sites that contains the mine name, Company name, address, and telephone number, MSHA ID number and permanent program permit ID number is found on page 5-4 (521.200 Signs and Markers). The area will also be marked with perimeter markers and topsoil markers. Stream buffer zone markers will not be required at any of the well sites.

### **Findings:**

The minimum requirements of this section have been met.

### **RECOMMENDATIONS:**

This amendment should be denied until the requirements of R645-301-527.200 – 527.210 have been satisfied.