

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

July 28, 2005

TO: Internal File

THRU: Pamela Grubaugh-Littig, Permit Supervisor

THRU: Dave Darby, Environmental Scientist, Hydrologist/Team Lead

FROM: Karl R. Houskeeper, Environmental Scientist III

RE: Mathis/Summit Creek State L.B.A. Boundary Change, Andalex Resources, Inc., Centennial Project, C/007/0019, Task #2263

SUMMARY:

The Division received an application for a boundary change for the remaining Mathis Tract, State L.B.A. and Federal Summit Creek Lease area on January 14, 2005. A letter from the Division was sent to the operator on April 29, 2005 indicating that the proposed amendment Task ID #2119 was deficient. The operator responded to the deficiencies on May 27, 2005 and this information was assigned Task ID #2263.

This memo addresses the administrative requirements that were deficient in Task ID #2119 and addressed in Task ID #2263.

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TECHNICAL ANALYSIS:

GENERAL CONTENTS

RIGHT OF ENTRY

Regulatory Reference: 30 CFR 778.15; R645-301-114

Analysis:

Appendix J of the approved MRP contains the right of entry information for the New Federal Lease UTU 79975 and the Mathis Tract Fee Lease. The State Lease By Application (L.B.A.) is still in process and the lease has not been issued or received by the Permittee or the Division.

Findings:

The Division received a transmittal letter, text and maps dated July 15, 2005 that requested the removal of the State L.B.A. from the permit amendment. The permit boundary has been revised to represent this deletion.

Information provided in the proposed amendment is considered adequate to meet the requirements of this section.

LEGAL DESCRIPTION AND STATUS OF UNSUITABILITY CLAIMS

Regulatory Reference: 30 CFR 778.16; 30 CFR 779.12(a); 30 CFR 779.24(a)(b)(c); R645-300-121.120; R645-301-112.800; R645-300-141; R645-301-115.

Analysis:

Page 1-21 of the approved MRP has been updated with the new legal description. The new description contains lots. Information has been provided to the Division to determine the location of the lots identified in the description on Plate 1-B.

Findings:

Information provided in the proposed amendment is considered adequate to meet the requirements of this section.

RECOMMENDATIONS:

It is recommended that the administrative section of this application be approved.