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State of Utah
DEPARTMENT OF NATURAL RESOURCES
Division of Oil, Gas & Mining

MICHAEL R. STYLER MARY ANN WRIGHT
Executive Director Acting Division Director

*OUTGOING
10070019*

DIVISION OF OIL, GAS AND MINING
FACSIMILE COVER SHEET

DATE: April 8, 2005

FAX#: 435-637-8860

ATTN: Mike Masson

COMPANY: Andalex Resources, Inc.

DEPARTMENT: _____

NUMBER OF PAGES (INCLUDING THIS ONE): 11

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State of Utah

**Department of
Natural Resources**

MICHAEL R. STYLER
Executive Director

**Division of
Oil, Gas & Mining**

MARY ANN WRIGHT
Acting Division Director

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April 8, 2005

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

Subject: Administrative Completeness Review for Mathis/Summit Creek,
Significant Revision, Andalex Resources, Inc., Centennial Project,
C/007/0019, Task #2119, Outgoing File

Dear Mr. Glasson:

The Division has completed a preliminary review of the Mathis/Summit Creek permit application that you submitted on January 20, 2005. The application is not complete. A copy of our Administrative Completeness Review worksheet is enclosed for your information and records.

A technical review of your plan has also been initiated. Technical deficiencies will be forwarded to you as reviews are completed. The Division will coordinate with other cooperating agencies and incorporate their comments into our review process. Issues raised will need to be resolved prior to permit issuance.

Please collect and submit the deficient information identified in the Administrative Completeness Review and obtain our approval before you publish a Notice of Complete Application. We look forward to working with you throughout the permitting process. Please call if you have any questions.

Thank you for your help in the permitting process.

Sincerely,

D. Wayne Hedberg
Permit Supervisor

an
Enclosure
cc: Price Field Office

**ADMINISTRATIVE COMPLETENESS REVIEW WORKSHEET
(R645-100)**

DATE: April 6, 2005

REVIEWER(S): David Darby, Joe Helfrich, Karl Houskeeper, Jim Smith, Wayne Western

APPLICANT: Andalex Resources Inc.

MINE NAME: Centennial Mine **FILE NO.:** 2119

"Administratively Complete Application" means an application for permit approval or approval for coal exploration, where required, which the Division determines to contain information addressing each application requirement of the State Program and to contain all information necessary to initiate processing and public review.

Directions: The categories listed below correspond to the minimum requirements for information necessary to initiate processing and public review. If a category is checked the Applicant has met the **Completeness** requirement for that category. If a category is not checked, the Completeness requirements have not been met. The comments column will identify the deficiency and what is necessary to correct it.

			Comments
301-112	Identification of Interests	—	See notes below.
100	Applicant's Business Structure	<u>X</u>	Already addressed in approved MRP.
210	Applicant's Name/Address/Phone	<u>X</u>	Already addressed in approved MRP.
220	Resident Agent's Name/Address/Phone	<u>X</u>	Already addressed in approved MRP.
230	Name/Address/Phone of AML Fees Payer	<u>X</u>	Already addressed in approved MRP.
300	Corporate Structure & Ownership	<u>X</u>	Already addressed in approved MRP.
400	Identify Other Mining Operations in US	<u>X</u>	Already addressed in approved MRP.
500	Surface & Mineral Ownership	<u>X</u>	Already addressed in approved MRP.
600	Ownership Contiguous to Permit	<u>X</u>	Already addressed in approved MRP.
700	MSHA Numbers	<u>X</u>	Already addressed in approved MRP.
800	Interest in Contiguous Lands	<u>X</u>	Already addressed in approved MRP.

301-113	Violation Information	<u>X</u>	See notes below.
100	Suspension or Revocation Information	<u>X</u>	No suspensions or revocations.
300	List of Violations - 3 Previous Years	<u>X</u>	Violation History has been updated to include the three previous years of history from the time of the application.
301-114	Right of Entry	—	The lease boundary description for Section 32 and a correct Locator Map need to be submitted.
301-115	Status of Unsuitability Claims	<u>X</u>	Already addressed in approved MRP.
301-116	Permit Term	<u>X</u>	Already addressed in approved MRP.
301-117	Insurance	<u>X</u>	Already addressed in approved MRP.
	Proof of Publication	—	Proof of publication still needs to be submitted, since this is a significant revision.
	Facilities and Structures Used in Common	<u>X</u>	Already addressed in approved MRP.
301-118	Filing Fee	<u>X</u>	Already addressed in approved MRP.
301-123	Notarized Signature of Responsible Official	<u>X</u>	Already addressed in approved MRP.
301-130	Information Collection: Technical Data Accompanied by Names of Persons or Organizations that Collected and Analyzed the Data - Dates of Collections - and Analysis of the Data and Description of the Methodology Used to Collect and Analyze Data	<u>X</u>	Already addressed in approved MRP.

301-200	Soils	<u>X</u>	Activities for this revision will only take place underground. No soils will be disturbed.
211	Description of Pre-mining Soil Resources	<u>X</u>	
221	Prime Farmland Investigation	<u>X</u>	
222	Soil Survey	<u>X</u>	
224	Substitute Topsoil Info (When Proposed)	<u>X</u>	
230	Operation Plan Topsoil Handling/Removal/Storage	<u>X</u>	
240	Reclamation Plan Soil Redistribution/Stabilization	<u>X</u>	

301-300	Biology	<u>X</u>	The application has addressed this section of the regulations.
320	Vegetation Information	<u>X</u>	<p>The vegetation resource information is provided for in chapter three of the MRP. Text changes for this IBC include page 3-1 of the Biology section of the application. The vegetation map is identified as plate 19A. The vegetation communities for the mine plan area include Mountain –Brush, Desert-Shrub, Pinyon-Juniper Woodland, Sagebrush-Grass, Conifer-Aspen, and Minor streamside vegetative types that cover the entire mine plan area. The vegetation community for this acreage addition is predominately Sagebrush-Grass and Aspen.</p> <p>The application includes a list of possible threatened, endangered and candidate plant species identified in the U. S. Fish and Wildlife Service current listing for Carbon County as appendix M.</p>
322	Fish and Wildlife Information	<u>X</u>	The Fish and Wildlife resource information is addressed on pages 3-2, 3-3, 3-11 and provided for in appendices A, D and M of the application.

323	Maps/Photos Vegetation-Fish-Wildlife Areas	<u>X</u>	Wildlife maps included in the application are a vegetation map, (plate 19A), a wildlife distribution map, (plate 34), this map depicts the location of raptor nests, Mule Deer, Elk and Sage Grouse ranges,). A current raptor inventory, (2004 appendix D), is included in the MRP. The vegetation reference area maps will not be affected by the addition of the Mathis/Summit Creek IBC. They are included in the current MRP.
330	Operation Plan Vegetation-Fish-Wildlife Protection	<u>X</u>	The protection and enhancement plan is addressed in appendix A of the approved MRP. The application states that "the Mathis/Summit Creek Incidental Boundary Change is simply an extension of our underground mine workings under roughly 2,600 to 3,000 feet of cover. Therefore there should be no effect to the surface Biology of the area. The application also includes a commitment to develop a mitigation plan with the Division of Wildlife Resources should problems occur.
341	Reclamation Plan for Revegetation	<u>X</u>	NA
342	Fish & Wildlife Plan for Reclamation Phase	<u>X</u>	NA

301-400	Land Use and Air Quality	<u>X</u>	<p>The Land Use resource information is provided for on page 4-1 of the application. As the overburden ranges from 2,600' to 3,100' above the current mine workings and is an extension of the current mine workings it is anticipated that potential impacts to the surface land resources would be minimal.</p> <p>The area is currently used for grazing, recreation and wildlife. Section 645-301-411.110 on page 4-1 indicates that Deadman, Straight and Hoffman Canyons would fall into three categories: 1) Fish and Wildlife habitat, 2) recreation lands and 3) Range Lands. According to the application the land has also historically been used for coal mining. By the early 1900's the majority of the Book Cliffs coal field had been prospected. Knight -Ideal, Zion, Olsen, and Sutton were mines that produced coal from the Gilson and Aberdeen coal seams. An additional prospect in the Sunnyside seam produced 1,400 tons of coal in 1964.</p>
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411	Pre-Mining Land Use Information (Includes Cultural Resources)	<u>X</u>	Senco Phoenix as contracted by Andalex Resources is conducting an order one archeological survey for the Summit lease expansion area. The area is currently used for grazing, recreation and wildlife. Section 645-301-411.110 on page 4-1 indicates that Deadman, Straight and Hoffman Canyons would fall into three categories: 1) Fish and Wildlife habitat, 2) recreation lands and 3) Range Lands. According to the application the land has also historically been used for coal mining. By the early 1900's the majority of the Book Cliffs coal field had been prospected. Knight -Ideal, Zion, Olsen, and Sutton were mines that produced coal from the Gilson and Aberdeen coal seams. An additional prospect in the Sunnyside seam produced 1,400 tons of coal in 1964.
412	Post-Mining Land Use Information	<u>X</u>	The post mining land use is the same as the pre-mining use. The area is currently used for grazing, recreation and wildlife. Section 645-301-411.110 on page 4-1 indicates that Deadman, Straight and Hoffman Canyons would fall into three categories: 1) Fish and Wildlife habitat, 2) recreation lands and 3) Range Lands. According to the application the land has also historically been used for coal mining.

301-500	Engineering	<u>X</u>	
510 520	General Description of Operation Plan (Maps, Locations, Cross-Sections, Narrative, Descriptions & Calculations)	<u>X</u>	Mine maps and general location maps were included. There are no surface facilities maps.
522	Coal Recovery Description	<u>X</u>	R2P2 information included.
523	Mining Methods	<u>X</u>	Continuation of longwall mining.
524	Blasting and Explosives Plan	<u>X</u>	NA
525	Subsidence Control Plan	<u>X</u>	Permittee will install monuments.
526	Mine Facilities Description (Narrative, Plans, Maps) Including Existing Structures & Support Facilities	<u>X</u>	No new surface facilities.
527	Transportation Facilities (Including Plans & Maps)	<u>X</u>	NA

528	Coal Mine Waste Plans (Description & Designs)	<u>X</u>	NA
529	Management of Mine Openings (Design)	<u>X</u>	NA
531	General Plans for Structures	<u>X</u>	NA
532	Sediment Control	<u>X</u>	NA
533	Impoundments	<u>X</u>	NA

301-534	Roads (Plans, Drawings, Designs, & Specifications)	<u>X</u>	NA
535	Spoil	<u>X</u>	NA
536	Coal Mine Waste	<u>X</u>	NA
537	Regraded Slopes	<u>X</u>	NA
540 541-542	Reclamation Narrative, Maps and Plans	<u>X</u>	NA
551	Casing and Sealing Underground Openings	X	NA
553	Backfilling and Grading Description	<u>X</u>	NA

301-600	Geology	<u>X</u>	A complete description of the geology is submitted in the MRP. No additional information is needed.
621	Description of Geology (Permit & Adjacent Area)	<u>X</u>	
622	Geologic Cross-Sections, Maps, and Plans	<u>X</u>	
630	Plans for Casing and Sealing Holes	<u>X</u>	

301-740	Plans and Designs	<u>X</u>	Hydrologic plans and designs for this area were included in the Summit Lease Tract - Incidental Boundary Change amendment.
	Operation and Reclamation Plan Sediment Control Measures		
	Siltation Structures	<u>X</u>	
	Sediment Ponds	<u>X</u>	
	Other Treatment Facilities	<u>X</u>	
	Diversions	<u>X</u>	
	Road Drainage	<u>X</u>	
	Impoundments	<u>X</u>	
	Discharge Structures	<u>X</u>	
	Disposal of Excess Spoil	<u>X</u>	
	Coal Mine Waste	<u>X</u>	
	Disposal of Non-Coal Mine Waste	<u>X</u>	
Casing and Sealing of Wells	<u>X</u>		

301-800	Bonding and Insurance	<u>X</u>	
820	Applicant Have Adequate Bond at Permit Issuance	<u>X</u>	
830	Bond Estimate and Calculations Provided	<u>X</u>	
890	Certificate of Insurance Provided	<u>X</u>	Checked during inspections

302-200	Special Categories of Mining	—	NA
210	Experimental Practices Mining	—	NA
220	Mountaintop Removal Mining	—	NA
230	Steep Slope Mining	—	NA
240	Auger Mining	—	NA

250	In Situ Processing Activities	—	NA
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302-260	Coal Processing Plants (Not Located Within Permit Area of Mine)	—	NA
270	Variances From Approximate Original Contour Restoration Requirements	—	NA
280	Variances for Delay in Contemporaneous Reclamation Requirement in Combined Surface and Underground Coal Mining Activities	—	NA
290	Small Operator Assistance Program (SOAP)	—	NA

302-300	Special Areas of Mining	—	NA
301	Prime Farmland	—	NA
302	Alluvial Valley Floors	—	NA

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301-700	Hydrology	<u>X</u>	Hydrologic information for this area was included in the Summit Lease Tract - Incidental Boundary Change amendment, which was approved by OSM on October 25, 2004.
721	Description of Hydrologic Resources (Permit and Adjacent Area)	<u>X</u>	Hydrologic resources for this area were described in the Summit Lease Tract - Incidental Boundary Change amendment.
722	Cross-Sections and Maps Subsurface Water - Surface Water - Monitoring Stations - Wells	<u>X</u>	
723	Sampling and Analysis	<u>X</u>	
724	Baseline Information Ground Water - Surface Water - Geology - Climatological & Supplemental; If Needed	<u>X</u>	
728	PHC Determination	<u>X</u>	The Mathis / Summit tracts were included in the PHC prepared in 2004 for the Summit Lease Tract - Incidental Boundary Change.
730	General Operation Plan Minimize Disturbance to Hydrologic Balance & Compliance with Clean Water Act	<u>X</u>	A hydrologic operation plan for this area was included in the Summit Lease Tract - Incidental Boundary Change amendment.
731	Ground and Surface Water Protection	<u>X</u>	
732	Ground and Surface Water Monitoring	<u>X</u>	

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Executive Director *Acting Division Director*

DIVISION OF OIL, GAS AND MINING
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COMPANY: Ardalex Resources, Inc

DEPARTMENT: _____

NUMBER OF PAGES (INCLUDING THIS ONE): 11

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