



## State of Utah

### Department of Natural Resources

MICHAEL R. STYLER  
*Executive Director*

### Division of Oil, Gas & Mining

JOHN R. BAZA  
*Division Director*

JON M. HUNTSMAN, JR.  
*Governor*

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*Lieutenant Governor*

December 21, 2005

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

Subject: Supplemental Information to Revised Appendix X and GVH #5A, #7, #8, #9, Andalex Resources, Inc., Centennial Project, C/007/0019, Task ID #2359, Outgoing File

Dear Mr. Glasson:

The Division received supplemental information to your application to revise Appendix X and GVH #5A, #7, #8, & #9 on November 16, 2005. Supplemental information was received on December 16, 2005 that changed the road designations from primary roads to ancillary roads.

The above-referenced amendment has been reviewed. There are deficiencies that must be adequately addressed prior to approval. A list of the technical deficiencies is included with this letter. Before the Division can approve the application, Andalex Resources, Inc. must adequately address the deficiencies.

The initials of the reviewers are at the end of each deficiency. If you have any questions, comments or need additional clarification please contact the individual reviewer. The reviewers are:

SKC	Steve Christensen
WHW	Wayne Western
JAE	Jerriann Ernsten
PWB	Priscilla Burton; and
KRH	Karl Houskeeper

In order for us to continue to process your application, please respond to these deficiencies by January 23, 2005. Your application will be denied if a response is not received within 90 days of the date of this letter.

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Mike Glasson  
December 21, 2005

If you have any questions, please call me at (801) 538-5286 or  
Karl R. Houskeeper at (435) 613-1146, Ext 201.

Sincerely,

D. Wayne Hedberg  
Permit Supervisor

KRH/sd  
Enclosure  
cc: Price Field Office  
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## LIST OF DEFICIENCIES

**R645-301-731**, The proposed locations for the vent holes are shown on Figure 1-1 of Appendix X. However, it appears that gob vent holes GVH-5A and GVH-8 will require the construction of an access road. The proposed access road locations need to be shown on Figure 1-1 in order for a determination to be made by the Division as to what potential hydrologic impacts may exist. ● In addition, the application refers to drawings 5-1, 5-2, 5-3, and 5-4 as being provided in a previous submission of Appendix X in Section 732-Sediment Control Measures. These drawings of typical gob gas vent holes and pad layouts should be included with this submittal. ● Section 732.400-Road Drainage refers to a Figure 5-5 that depicts a typical road cross section. Figure 5-5 was not included with this submittal. (SKC)

**R645-301-732, -732.400**, More information is needed in regard to gob vent holes GVH-5A and GVH-8. Figure 1-1 depicts these gob vent holes in areas that are currently not accessible by existing roads. If access roads will need to be constructed for the installation of these gob vent holes, the Permittee needs to discuss what techniques will be used during construction and after construction to control drainage and retain sediment on the road sites. GVH-8 is located approximately 1/8<sup>th</sup> of a mile east of the Right Fork of Antone Creek and approximately 1/8<sup>th</sup> of a mile west of the Left Fork of Antone Creek. If the Permittee intends to access GVH-8 by crossing either one of the aforementioned drainages, more information will be needed as to what steps they will take to minimize disturbance to the channel. Figure 1-1 does not depict the proposed access road locations for either GVH-5A or GVH-8. ● The Permittee should verify that gob vent holes GVH-7 and GVH-9 will be accessed by existing roads as shown on Figure 1-1. (SKC)

**R645-301-830.120**, The Permittee must include the Division's revised reclamation cost estimate in the MRP. The Division will give the Permittee a copy of the revised reclamation cost estimate in either electronic format or a paper copy. (WHW)

**R645-301-121.200**, The Permittee must clarify all references to drill hole #2 in all of Appendix X. There are references to drill hole 2 rather than the replaced drill hole 3 throughout Appendix X. Drill hole 3 was drilled, but not 2. ● The Permittee must clarify the updated agreement in Appendix X related to using the reference area method rather than the Range Site method for all holes, including #1, 3, 5, and 6. Furthermore, the Permittee must clarify what is meant by the "Range site method is considered a Class III survey...". ● The Permittee should provide a citation in section 321.200 for the location of the pictures for the GOB sites. ● Clarify the statement made in Section 333.330 related to habitat. As far as the Division understands, all areas are habitat of one kind or another. (JAE)

**R645-300-124.330**, The Permittee must resubmit all historic resource surveys as "Confidential" and direct the Division to locate such documents in the MRP Confidential Binder upon approval (SLC, Division PIC). (JAE)

**R645-301-321**, The Permittee must provide the missing vegetation survey report. Make sure to remove comments that the reports "will be" provided and to include the photos for the sites in the report. • The Permittee must complete the table in Section 321.200. (JAE)

**R645-301-322**, The Permittee must provide the missing TE and raptor survey reports. Make sure the raptor survey is marked confidential. (JAE)

**R645-301-322**, The Permittee should provide a follow-up letter concerning MSO. The Division recommends that Mr. Coonrod ground-truth the area of proposed holes (if he has not done so before) and resubmit another statement of whether there is possible habitat for all holes proposed within the Mathis lease. The Permittee must provide this letter in Attachment 3-2 of Appendix X. The Division cautions the Permittee, that we are NOT requesting a calling survey, which takes considerable time and money. (JAE)

**R645-301-323.100**, The Permittee must provide a map that details the locations of the reference areas for the main facilities site, GOB holes, and all other projects areas. The Division requests that the Permittee illustrate the reference areas on a single map if possible. The most important criteria is to make sure locations are clearly defined. (JAE)

**R645-301-333**, The Permittee must update the values according to the requirements listed below. Furthermore, the Permittee must include water "appropriated and hauled and or pumped to the sites by a licensed contractor" (p. 3-6) i.e., include all water consumed by operations related to the removal of coal. The Permittee will want to remove this related paragraph in Section 333 (p. 3-6). • The MRP must include a subsection in the PHC that presents equation sets with subtotals for all consumptive uses and contributions as well as the water balance total for the entire mining operations - not just the GOB project. All equation sets (e.g., Postmine Inflows) must include citations directing the reader to chapters, sections, and page numbers within the MRP for supporting evidence. • The MRP must include a discussion in the Biology Section that addresses possible adverse affects to the four fish species. This Section will also need to include the water balance total (e.g., Contribution of 1000 acre-foot or Depletion of 105 acre-foot) and a citation to the PHC for calculations and evidence. The Division highly recommends that the Permittee contact the Division prior to submitting the updated values. We are in the process of updating our requirements, which should be completed by middle of January 2006. • Equation sets with subtotals for all consumptive uses and contributions as well as supporting evidence must at least cover the following: Mining consumption (usually where all dust suppression calculations are included), Ventilation consumption, Coal producing consumption, Ventilation evaporation, Sediment pond evaporation, Springs and seep effects from subsidence, Alluvial aquifer abstractions into mines, Alluvial well pumpage (usually where discharge calculations are included), Deep aquifer pumpage, Postmining inflow to workings, Coal moisture loss, and Direct diversions. (JAE)

**R645-301-333**, The Permittee mentions that they will protect all species and habitat. Section 333 should include examples of how the Permittee plans to implement this commitment. For example, include raptor surveys, routes of travel, protection plans for the transportation and storage of water, plans for dust control and other road erosion controls, and yearly coordination, and planning with the interdisciplinary wildlife team (USFWS, DWR, BLM, USFS, and Division). (JAE)

**R645-301-222**, The application must include the field description forms for each soil pit along with the laboratory analysis sheets for all soil samples. (PWB)

**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. (KRH)