0003

Refer to Expandable 01272006
in C0070019, 2006, Incoming

ANDALEX
RESOURCES, INC.

P.O. BOX 902
PRICE, UTAH 84501
PHONE (435) 637-5385
FAX (435) 637-8860

January 27, 2006

Incoming
C/007/0019

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

Attn: Pamela Grubaugh-Littig/Wayne Hedberg
Permit Supervisors

Re: Response to Technical Deficiencies, Revised Appendix X and GVH #5A, #7, #8, #9, Centennial Project, C/007/0019, Task #2359

Dear Ms. Littig,

Enclosed are 5 copies of the Andalex Resources, Inc. response to the Technical Deficiencies for the Appendix X and GVH #5A, #7, #8 and #9 proposed sites for the Centennial Project M.R.P.

In an effort to expedite the review, a checklist for response locations is provided. Figures and Attachments previously submitted and approved have not been resubmitted with this proposal except as requested.

Required C_1/C_2 Forms are enclosed. If you have any questions, or need additional information, please let me know.

Sincerely,

Michael W. Glasson
Senior Geologist

attachments

RECEIVED
JAN 27 2006
DIV. OF OIL, GAS & MINING

APPLICATION FOR PERMIT PROCESSING

Permit Change X	New Permit ☐	Renewal ☐	Transfer ☐	Exploration ☐	Bond Release ☐	Permit Number: C/007/0019
Title of Proposal: Response to Technical Deficiencies for the revised Appendix X and GVH #5A, #7, #8, #9.						Mine: Centennial Project Permittee: Andalex Resources

Description, include reason for application and timing required to implement: To enhance mine safety by venting longwall gob gas to the surface.

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*

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

Michael W. Clemons Sr. Geologist 01/27/06
Signed - Name - Position - Date

Subscribed and sworn to before me this 27 day of Jan., 20 06.

Robyn Nelson
Notary Public

My Commission Expires: 8/8/08
Attest: STATE OF Utah
COUNTY OF Carbon

Jan 27, 20 06

ROBYN NELSON
NOTARY PUBLIC • STATE of UTAH
82 WEST MAIN
PRICE, UTAH 84501
COMM. EXPIRES 8-8-2008

RECEIVED
Received by Oil, Gas & Mining
JAN 27 2006
DIV. OF OIL, GAS & MINING

ASSIGNED TRACKING NUMBER

Application for Permit Processing
Detailed Schedule of Changes to the MRP

Title of Application: Response to Technical Deficiencies for the revised Appendix X and GVH #5A, #7, #8, #9. (Note: All changes are in Appendix X Revised October 2005)	Permit Number: C/007/0019
	Mine: Centennial Project
	Permittee: Andalex Resources

Provide a detailed listing of all changes to the mining and reclamation plan which will be required as a result of this proposed permit application. Individually list all maps and drawings which are to be added, replaced, or removed from the plan. Include changes of the table of contents, section of the plan, pages, or other information as needed to specifically locate, identify and revise the existing mining and reclamation plan. **Include page, section and drawing numbers as part of the description.**

			DESCRIPTION OF MAP, TEXT, OR MATERIALS TO BE CHANGED
☐ ADD	X REPLACE	☐ REMOVE	Attachment 2-1
☐ ADD	X REPLACE	☐ REMOVE	p. 3-iii Table of Contents
☐ ADD	X REPLACE	☐ REMOVE	pages 3-1, 3-2, 3-4
X ADD	☐ REPLACE	☐ REMOVE	page 3-4a
☐ ADD	X REPLACE	☐ REMOVE	page 3-6
☐ ADD	X REPLACE	☐ REMOVE	Attachments 3-1, 3-2
☐ ADD	☐ REPLACE	X REMOVE	Attachment 3-3 (Relocate to Confidential Binder)
X ADD	☐ REPLACE	☐ REMOVE	Attachment 3-4
☐ ADD	X REPLACE	☐ REMOVE	page 4-ii Table of Contents
☐ ADD	X REPLACE	☐ REMOVE	page 4-1
☐ ADD	☐ REPLACE	X REMOVE	Attachment 4-1 (Relocate to Confidential Binder)
☐ ADD	X REPLACE	☐ REMOVE	pages 5-1, 5-2
☐ ADD	X REPLACE	☐ REMOVE	page 5-5
X ADD	☐ REPLACE	☐ REMOVE	pages 5-5a, 5-5b
X ADD	☐ REPLACE	☐ REMOVE	Figures 5-1 through 5-5
☐ ADD	X REPLACE	☐ REMOVE	pages 8-1, 8-2
☐ ADD	X REPLACE	☐ REMOVE	Figure 1-1
X ADD	☐ REPLACE	☐ REMOVE	Confidential Binder
☐ ADD	☐ REPLACE	☐ REMOVE	
☐ ADD	☐ REPLACE	☐ REMOVE	
☐ ADD	☐ REPLACE	☐ REMOVE	
☐ ADD	☐ REPLACE	☐ REMOVE	
☐ ADD	☐ REPLACE	☐ REMOVE	

Any other specific or special instructions required for insertion of this proposal into the Mining and Reclamation Plan?

RECEIVED
JAN 27 2006
DIV. OF OIL, GAS & MINING

Checklist
for
List of Deficiencies
(Appendix X)

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)

1- All roads are shown on Figure 1-1, and described in Sections 512.200, and 527.200.
2- Figures 5-1 through 5-4 are included.
3- Figure 5-5 is also included.

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 1/8th of a mile east of the Right Fork of Antone Creek and approximately 1/8th 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)

1- Roads are shown on Figure 1-1 and described in Sections 512.200 and 527.200.
2- Section 512.200.

R645-301-830.120, The Permittee must include the DivisionÆs 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)

1- The revised reclamation cost has been included in the MRP under a separate amendment. See Section 830 of this submittal for reference.

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. ò 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...". ò The Permittee should provide a citation in section 321.200 for the location of the pictures for the GOB sites. ò 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)

1- References to drill hole #2 have been removed.
2- Section 321.
3- Section 321.100 and Attachment 3-4.
4- Section 333.300

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)

1- Resubmitted as Confidential.

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. ò The Permittee must complete the table in Section 321.200. (JAE)

1- Vegetation reports are included as Attachment 3-1.
2- Section 321.200

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

1- Attachment 3-2 and Confidential Folder, Attachment 3-3.

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)

1- Updated MSO report is included for Attachment 3-2.

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)

1- Figure 1-1 and Attachment 3-1.

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). ò 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. ò 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. ò 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)

1- Sections 322.200 and 333.
2- Table 3-4.
3- Section 322.200 and Table 3-4.
4- Table 3-4.

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)

1- Included in Section 333.

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)

1- All soils data is included in the Soils Report in Attachment 2-1.

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)

1- All roads are shown on Figure 1-1. Complete description of each road is included in Section 527.200.