

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

JK

October 27, 2006

TO: Internal File

THRU: Pamela Grubaugh-Littig, Permit Supervisor, Task Manager *pgl*

FROM: Karl R. Houskeeper, Environmental Scientist/Engineering, Team Lead *KRH by an*

RE: Left Fork Fan Area As-Built Map, Andalex Resources, Inc., Centennial Project, C/007/019, Task ID #2640

SUMMARY:

In 1995, information was submitted to the Division for the construction of three portals including a fan in the left fork of Dead Man Canyon to ventilate the Aberdeen Mine. Some confusion exists on the process at that time. Information on this construction is contained in Appendix W. Finalized documents including an updated Surface Facilities Map and appropriate bond calculations were never finalized and included into the mining and reclamation plan. Two portals of the three were constructed in 1995.

In the summer of 2006, the company constructed the third portal. The location of the portal is in a different location than originally proposed, but remained in the disturbed area where the soil had been previously stripped. The drainage from this new portal is treated by the same structures already in place.

The information submitted with this amendment consists of an updated As-Constructed Map to be added to Appendix W. The amendment still has not updated the Surface Facilities Map, nor has it provided the information necessary to update the bond. With the three portals in the left fork of Dead Man Canyon, the total number of portals associated with the Aberdeen mine is seven. Currently, the bond only shows four portals associated with the Aberdeen Mine.

This memo will address the engineering section of this amendment. The bonding section of this amendment will be done by a different reviewer under a separate memo.

TECHNICAL MEMO

TECHNICAL ANALYSIS:

OPERATION PLAN

MINING OPERATIONS AND FACILITIES

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

Analysis:

Two portals were constructed out of three in 1994 in the Left Fork of Dead Man Canyon. A third portal for ventilation was constructed in 2006. The mining and reclamation plan has information in Appendix W, but the appropriate text in main body of the mining and reclamation plan has not been updated. In addition, the surface facilities map does not depict the facilities in the Left Fork of Dead Man Canyon.

Findings:

Information provided in the mining and reclamation plan is not considered adequate to meet the requirements of this section. Prior to approval, the permittee must provide the following in accordance with:

R645-301-526, The narrative contained throughout the body of the mining and reclamation plan needs to be updated to show the construction that occurred in 1994 and 2006 in the Left Fork of Dead Man Canyon.

MAPS, PLANS, AND CROSS SECTIONS OF MINING OPERATIONS

Regulatory Reference: 30 CFR Sec. 784.23; R645-301-512, -301-521, -301-542, -301-632, -301-731, -302-323.

Analysis:

Mining Facilities Maps

The surface facilities map Plate 6 does not depict the facilities in the Left Fork of Dead Man Canyon.

Certification Requirements

Updates and changes to the surface facilities map need to be certified by a registered P.E. in the State of Utah.

Findings:

Information provided in the mining and reclamation plan is not considered adequate to meet the requirements of this section. Prior to approval, the permittee must provide the following in accordance with:

R645-301-512, The surface facilities map needs to be updated to show the three portals in the Left Fork of Dead Man Canyon. The updates need to be certified by a registered P.E. in the State of Utah.

RECOMMENDATIONS:

Task ID #2640 should not be approved until the concerns listed in this memo for the engineering section have been addressed.