

# TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

October 27, 2006

TO: Internal File

THRU: Pamela Grubaugh-Littig, Permit Supervisor, Task Manager   
Karl R. Houskeeper, Environmental Scientist/Engineering, Team Lead

FROM: Wayne H. Western, Environmental Scientist/Bonding

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 bonding issues.

**TECHNICAL MEMO**

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**TECHNICAL ANALYSIS:**

**RECLAMATION PLAN**

**BONDING AND INSURANCE REQUIREMENTS**

Regulatory Reference: 30 CFR Sec. 800; R645-301-800, et seq.

**Analysis:**

**Determination of Bond Amount**

The Permittee must include detailed reclamation cost estimates for the portal facilities located in the Left Fork of Deadman Canyon. The Permittee states that some portals have been sealed and therefore offset the cost of reclaiming the Deadman Canyon facility. The Division cannot reduce the bond for work unless there is a bond release.

**Findings:**

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

**R645-301-830.120**, The Permittee must include detailed information on the reclamation costs of the portal facilities at the Left Fork of Deadman Canyon.

**RECOMMENDATIONS:**

The Division should deny the amendment until all of the above-mentioned deficiencies have been adequately addressed.