

# TECHNICAL MEMORANDUM

## Utah Coal Regulatory Program

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December 10, 2008

TO: Internal File

THRU: Jim Smith, Permit Supervisor

JS 12/10/08

FROM: CCU April A. Abate, Environmental Scientist II

SUBJECT: Permit Change for Guard Shack, Andalex Resources, Inc. (Andalex), Centennial Mine, Permit # 007/0019, Task #3091

### SUMMARY:

An 8' x 8' guard shack was recently constructed at the entrance to the Centennial Mine located within Sections 7 and 18 T. 12 S. R 11 E and on the Bureau of Land Management (BLM) Right-of-Way UTU-62045 within the permit boundaries of the Centennial mine. The guard shack was constructed for security purposes sometime in October 2008 in response to the mine ceasing active operations.

The guard shack was constructed within the disturbed area. Surface drainage from the area discharges to a sediment pond located adjacent north of the newly constructed guard shack. No off-site hydrologic impacts were noted from the most recent site inspection. On October 28, 2008 the Division of Oil, Gas, and Mining (the Division) cited Andalex for failure to submit a permit change for the guard shack structure prior to its construction (Citation #10030). Andalex's submittal of this permit change to add the guard shack to the Mining and Reclamation Plan (MRP) is in response to Citation #10030.

The original amendment to append the MRP with the addition of the guard shack (Task #3085) was returned deficient on November 26, 2008 citing that the Permittee did not provide the Division with updated reclamation cost estimates that include the cost to construct and reclaim the guard shack structure. On December 1, 2008 the Division received a response from Andalex with the reclamation cost estimate for the guard shack provided.

The amendment meets the requirements of the State of Utah R645-Coal Mining Rules and should therefore be approved. The Permittee has met the conditions stipulated in Citation #10030; therefore the citation should be abated.

cc: K. Houskeeper, PFO

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**TECHNICAL MEMO**

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**TECHNICAL ANALYSIS:****OPERATION PLAN****SUPPORT FACILITIES AND UTILITY INSTALLATIONS**

Regulatory Reference: 30 CFR Sec. 784.30, 817.180, 817.181; R645-301-526.

**Analysis:**

The Permittee met the requirements of this section. The Permittee provided the Division with updated information regarding the structure included on Plate 6 – As Constructed Surface Facilities Map, and in the list of existing structures of the MRP, Section 5, pages 31 and 158.

**Findings:**

The information provided in the proposed amendment is considered adequate to meet the requirements of this section.

**MAPS, PLANS, AND CROSS SECTIONS OF MINING OPERATIONS**

Regulatory Reference: 30 CFR Sec. 784.23; R645-301-512, -301-521,

**Analysis:****Mining Facilities Maps**

The Permittee met the requirements of this section. The Permittee provided the Division with an updated Plate 6 that shows the location of the guard shack within BLM Right-of-way UTU-62045 inside the permitted area.

**Findings:**

The information provided in the proposed amendment is considered adequate to meet the requirements of this section.

## RECLAMATION PLAN

### BONDING AND INSURANCE REQUIREMENTS

Regulatory Reference: R645-301-800.812.700/820.113/830.140

#### **Analysis:**

##### **General**

The Permittee meets the requirements of this section.

#### **Findings:**

The Permittee has provided the Division with updated reclamation cost estimates that include the cost to reclaim the guard shack structure.

#### **RECOMMENDATIONS:**

The Division should approve the amendment to add the guard shack structure to the MRP.