

# TECHNICAL MEMORANDUM

## Utah Coal Regulatory Program

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February 3, 2010

TO: Internal File

THRU: Daron Haddock, Program Supervisor *DH*

FROM: April Abate, Environmental Scientist II/Lead/Hydrologist *AA*  
*2-17-2010*

RE: Midterm Permit Review, Andalex Resources, Centennial Project, 007/0019 Task #3465

### SUMMARY:

The Division is in receipt of the second response to the midterm deficiency letter dated January 28, 2010. Tasks related to midterm permit review include: #3276 and #3409.

The remaining deficiencies identified at midterm as well as the Division responses are outlined herein. The Division has determined that the response letter submitted on January 28, 2010 adequately addresses the deficiencies and complies with the R645 Coal Mining Rules.

Because the gas vent wells are currently producing gas that is presently being extracted by Oso Energy Services, consultation with the Division's Oil and Gas program is appropriate to determine the proper permitting actions for these wells while the mine is idle.

The midterm is recommended for approval.

**TECHNICAL MEMO**

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**TECHNICAL ANALYSIS:**

**OPERATION PLAN**

**MINING OPERATIONS AND FACILITIES**

Regulatory Reference: R645-301-515.320-322

**Analysis:**

In the previous midterm response letter submitted by the Permittee on October 1, 2009, various correspondences between the Federal agencies and the mine company clarifying the status of the mine as being in a temporary cessation were included; however, there were no changes submitted to the pertinent section of the MRP.

**Findings:**

In accordance with R645-301-515.320-322, page 5-123 of the MRP was updated and details all temporary closure measures undertaken at the Aberdeen mine. Disturbed acreage at the mine was listed as 52.64 acres. Total vertical strata in the permit area prior to idling was listed as 0 feet below grade (bg) to 3,000 feet bg and total extent of horizontal strata were listed as 21,432' measured north to south and 21,768' measured east to west. No reclamation has been performed with respect to the temporary closure of the underground workings except for the reclamation of gas vent wells GVH-1 and GVH-5. All environmental monitoring including subsidence and water monitoring actions are still being performed at the site.

**RECLAMATION PLAN**

**POST MINING LAND USES**

Regulatory Reference: 30 CFR Sec. 784.15, 784.200, 785.16, 817.133; R645-301-412, -301-413, -301-414, -302-270, -302-271, -302-272, -302-273, -302-274, -302-275.

**Analysis:**

Appendix X, Section 4, Page 4-2 of the MRP designates the post-mining land use for the gob gas vent wells as “livestock and wildlife grazing and other uses indicated by the landowner i.e. hunting”. Page 4-3 of Appendix X states that no alternative land use was proposed. The R645 coal rules do allow for an alternative post mining land use option under **R645-301.413.300** after consultation with the landowner and/or the land management agency with jurisdiction.

**Findings:**

**[R645-301.412 thru 414]:** The Permittee has expressed their intent to keep all remaining GVH installations because of the wells are considered integral and vital components of the overall mine ventilation system. Therefore will remain under the jurisdiction of the Permittee in a stand-by mode until plans to resume underground mining are initiated. As a result, no post-mining land use change is needed. During this interim period, gas continues to be extracted by Oso. Consultation with the Division’s Oil and Gas program is appropriate to determine the proper permitting actions for these wells while the mine is idle.

**RECOMMENDATIONS:**

The midterm review is recommended for approval.