

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

May 10, 2006

TO: Internal File

THRU: Priscilla W. Burton, Environmental Scientist/Soils, Team Lead

FROM: Wayne H. Western, Environmental Scientist/Engineering, Bonding

RE: MRP Rewrite, Andalex Resources, Inc., Wildcat Loadout, C/007/0033, Task ID #2451

SUMMARY:

On June 20, 2005, the Division received a rewritten MRP for the Wildcat Loadout. The rewritten MRP is organized into sections and subsections similar those in the R645 Rules. This memo deals specifically with bonding.

TECHNICAL ANALYSIS:

RECLAMATION PLAN

BONDING AND INSURANCE REQUIREMENTS

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

Analysis:

Form of Bond

The Permittee met the minimum requirements of this section of the R645-Rules. The Permittee provided the bond in the form prescribed by the Division.

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Determination of Bond Amount

The Permittee met the minimum requirements of this section of the R645 Rules.

The Division calculated the reclamation cost of the Wildcat Loadout. Those calculations are in Appendix B of the MRP. The calculations are based on the R645-301-830 rules, the OSM reclamation handbook, and the Division's reclamation cost technical directive.

Terms and Conditions for Liability Insurance

The Permittee met the minimum requirements of this section of the R645 Rules. A copy of the insurance certificate is in Appendix B of the MRP.

Findings:

The Permittee has met the minimum requirements of this section of the regulations.

RECOMMENDATIONS:

The Division should approve the amendment.