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# TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

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June 28, 2011

TO: Internal File

THRU: Steve Christensen, Hydrologist and Team Lead *SKC*

FROM: James Owen, Engineer

RE: Permit Boundary Amendment, Sunnyside Cogeneration Associates, Sunnyside Refuse & Slurry, C/007/0035, Task #3821

**SUMMARY:**

On May 2, 2011, Sunnyside Cogeneration Associates submitted an application for a permit amendment to the Division of Oil Gas & Mining. The permit amendment is principally associated with an adjustment to the permit area along the south and west boundaries. It is intended to remove approximately 67.9 acres of undisturbed or previously reclaimed area (Old Course Road).

This memo addresses compliance with the engineering (R645-301-500) and bonding (R645-301-800) sections of the Utah Coal Mining Rules.

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**TECHNICAL MEMO**

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**TECHNICAL ANALYSIS:**

**OPERATION PLAN**

**MINING OPERATIONS AND FACILITIES**

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

**Analysis:**

Minor changes were made to the narrative on pages 500-1, 500-2, 500-4, 500-8, 500-9, 500-10, 500-11, 500-13, 500-14, 500-15, 500-18, and 500-19 to correct plate references and inspection modifications. The boundary change removes 67.9 acres from Parcel A

**Findings:**

Contents and information provided are sufficient enough to meet the minimum requirements of this section of the Utah Coal Mining Rules.

**RECLAMATION PLAN**

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

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

**Analysis:**

Updated maps were included with the amendment. Some maps had a PE Stamp, though they were not properly certified.

**Findings:**

Contents and information provided are not sufficient enough to meet the minimum requirements of this section of the Utah Coal Mining Rules. The following deficiency was identified:

- **R645-301-512** Maps, cross-sections and drawing must be properly certified. Proper certification includes signature, seal, and date. The Division recommends that the applicant follow the requirements detailed in State Rules R156-22-601 for seal requirements.

## **BONDING AND INSURANCE REQUIREMENTS**

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

### **Analysis:**

Acres and cubic yardage details within the bond calculation spreadsheets were updated to reflect the decrease in bonding area. The bond amount was adjusted for the MRP during a midterm permit review in 2010. Those estimates, including escalation factors, will not be revisited until the next mid-term, or until a significant amendment to the permit is made that affects the bond. Bonding estimates are adequate and should reflect the requirements and estimates calculated by the Division during the process and review of Phase III Bond Release of Old Course Road (Task #3718)

### **Findings:**

Contents and information provided are sufficient enough to meet the minimum requirements of this section of the Utah Coal Mining Rules.

### **RECOMMENDATIONS:**

The amendment will be recommended for approval with the condition that the above mentioned deficiency is adequately addressed.