

March 3, 2006

Erwin Sass, General Manager  
Canyon Fuel Company, LLC  
P. O. Box 1029  
Wellington, Utah 84542

Subject: Degassification Wells G-11 and G-12, Canyon Fuel Company, LLC,  
Dugout Canyon Mine, C/007/0039, Task ID #2408, Outgoing File

Dear Mr. Sass:

The above-referenced amendment has been reviewed. There are deficiencies that must be adequately addressed before we can complete our evaluation of your proposal. A list of these deficiencies is enclosed for your reference. The initials of the individual who prepared the deficiency comment is found at the end of each section. Please have your staff contact these individuals directly should they have questions regarding a specific review comment. The individuals assigned to this review team are as follows:

PWB	Priscilla Burton
DWD	David Darby
JAE	Jerriann Ernstsens
WHW	Wayne Western
PHH	Peter Hess, Lead

Please respond to these deficiencies within 45 days of your receipt of this letter, so that the Division can respond in a timely manner.

If you have any questions, please call me at (801) 538-5286 or Peter Hess, at (435) 613-1146, Ext. 203.

Sincerely,

D. Wayne Hedberg  
Permit Supervisor

PHH/sd  
Enclosure  
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**Deficiency List**  
**Task ID #2408**

- R645-301- 323.100**, The Permittee must provide a vegetation map with all reference areas or range sites. This map will probably be best presented in two parts because the reference areas are spread out over an extensive area. The map must be presented such that it would be easy to locate reference areas. This map will be incorporated in the main MRP volume. • The Permittee also needs to update the project specific vegetation maps (Vol. Methane Degasification Amendment, Figs. 3-1 and 3-2) such that they provide all four reference areas. JAE
- R645-301-333**, The February 2005 estimated annual water budget is a net gain of 303.1-acre-ft. The value includes the Pace fan and SITLA projects, but not the G11-G12 degas well project or any additional mining operation. The Permittee must update the MRP from 303.1-acre ft. to a value that includes water consumption values for the entire mining operation. The Permittee must replace the project-specific water consumption information from the Methane Degasification Volume (p. 3-5) with the same water consumption discussion provided in the MRP. The Division is currently developing a worksheet that a Permittee may use to calculate water budget values. The Permittee should contact the Division to see if this worksheet is available. JAE
- R645-301-522**, COAL RECOVERY; The Permittee must obtain a USDOJ / BLM R2P2 approval to ensure that the Permittee will commit to meeting the requirements of Federal Regulations 43 CFR Chapter 11, Subpart 3484, (3). Although the Permittee has committed to this within the application, the BLM R2P2 approval remains necessary. PHH
- R645-300-133.100**, There are three figures submitted for each well site. Two of these are both labeled FIGURE 1 (for well G-11 as well as G-12). Similarly, there are two FIGURE 2s, and two FIGURE 3s. The Division has relabeled these as FIGURES 11-1, 11-2, and 11-3 respectively, and 12-1, 12-2, and 12-3 to help avoid confusion during the review. The next submittal should contain these drawings, with the re-labeled designations. PHH
- R645-301-512.110, -301-521, 525.420**, the Permittee must submit a map of the Mine workings which shows the location of proposed wells G-11 and G-12 with respect to their associated longwall panels, as well as a description as to how the locations selected for the wells were determined. The Permittee may want to include surface access considerations in this description. This map must be P.E. certified. PHH
- R645-301-521**, The Permittee should state the size of the disturbed areas and include all disturbance and structures developed for the site. It is unclear if the water bars were pre-existing or developed for the degas site. DWD

**R645-301-551, R645-301-542.100,** (1) the Division requires that the Permittee notify the agency when the 7 day monitoring of the degasification well (as required under 30 CFR Part 75.364 (a)(2) is discontinued. PHH

(2) The Division requires that the Permittee commit to “a reasonably specific time” to initiate the reclamation activities associated with degasification well sites upon the cessation of methane well monitoring. PHH

(3) In order for the Division to allow for the delay in the initiation of the reclamation activities at well sites G-2 and G-5, additional justification is needed as to why the Permittee feels it is necessary to allow “additional time for venting of the gob”. PHH

**R645-301-720,** During the course of drilling the degasification wells, the Permittee will be required to report the depth and volume characteristics of groundwater encountered. DWD

**R645-301-732-100, R645-301-742.200,** The Permittee shall use the permit area size determined from R645-301-521 to calculate the amount of runoff generated during the 10 yr-24 hr runoff event to ensure the silt fences can treat the runoff. The permittee shall provide those calculations. DWD

**R645-301-730,** The figures in Attachment 5-1 should provide contours on the figures that show the stream channel in relation to the proposed degasification well sites. DWD