



State of Utah  
DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF OIL, GAS AND MINING

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March 2, 1998

Jean Semborski, Environmental Coordinator  
Andalex Resources, Inc.  
6750 Airport Road  
P.O. Box 902  
Price, Utah 84501

Re: Initial Completeness Review, West Ridge Mine Application, Andalex Resources, Inc., West Ridge Mine, PRO/007/041-98A, Folder #2, Carbon County, Utah

Dear Ms. Semborski:

The Division has completed an initial review of your West Ridge Mine application. We cannot determine your application to be administratively complete. For the most part, the application meets the administrative requirements, however there are a few items that still need to be addressed. They include the following:

- Right of Entry-- Not administratively complete. No right of entry for Township 14 South, Range 13 East, SE ¼ SE ¼ Sect. 10; NE ¼ NE ¼ Sect. 15; and a portion of Sect. 16.
- Biology--Operation Plan: ~~Vegetation-Fish-Wildlife Protection~~-- Cannot find information about water use (impacts to Colorado River drainage). Unless this information is in the MRP, this section is not administratively complete.
- Post-Mining Land Use Information--Need comments from surface management agencies about postmining land use.
- Experimental Practices Mining--The applicant must organize experimental practices into one section within the Mining and Reclamation Plan (MRP). Other references and discussions may stay as they are. The success of this project hinges on approval of the projected experimental practices. The presence in the MRP of an organized, concise Experimental Practices section will make it easier for the Division and the U.S. Office of Surface Mining to do a more complete and timely review while coordinating the respective review efforts.

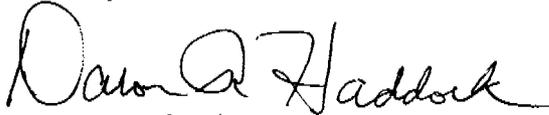
Enclosed is a copy of the Division's review worksheet. The majority of the categories have been checked to indicate that they are administratively complete. Those sections marked with an X are considered incomplete. Andalex will need to provide information which addresses these categories

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before further processing can occur.

Please provide the information as quickly as possible. If you have any questions, please call me.

Sincerely,

A handwritten signature in black ink that reads "Daron R. Haddock". The signature is written in a cursive style with a large, looped initial "D".

Daron R. Haddock  
Permit Supervisor

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Enclosure  
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**ADMINISTRATIVE COMPLETENESS REVIEW WORKSHEET**  
(R645-301-150)

DATE: 25 February, 1998 REVIEWER(S): Paul Baker, Robert Davidson, Jesse Kelley, James D. Smith

APPLICANT: Andalex Resources, Inc. MINE NAME: West Ridge Mine FILE NO. PRO/007/041

**"Administratively Complete Application"** means an application for permit approval or approval for coal exploration, where required, which the Division determines to contain information addressing each application requirement of the State Program and to contain all information necessary to initiate processing and public review.

**Directions:** The categories listed below correspond to the minimum requirements for information necessary to initiate processing and public review. If a category is checked the Applicant has met the Completeness requirement for that category. If a category is not checked, the Completeness requirements have not been met. The comments column will identify the deficiency and what is necessary to correct it.

**Comments**

301-112	Identification of Interests	<u>✓</u>	
100	Applicant's Business Structure	<u>✓</u>	
210	Applicant's Name/Address/Phone	<u>✓</u>	
220	Resident Agent's Name/Address/Phone	<u>✓</u>	
230	Name/Address/Phone of AML Fees Payer	<u>✓</u>	
300	Corporate Structure & Ownership	<u>✓</u>	
400	Identify Other Mining Operations in US	<u>✓</u>	
500	Surface & Mineral Ownership	<u>✓</u>	

600	Ownership Contiguous to Permit	<u>✓</u>	
700	MSHA Numbers	<u>✓</u>	MSHA numbers are to be issued. The Division can initiate review without this information. Therefore, consider administratively complete.
800	Interest in Contiguous Lands	<u>✓</u>	

**Comments**

301-113	Violation Information	<u>✓</u>	
100	Suspension or Revocation Information	<u>✓</u>	
300	List of Violations - <b>3 Previous Years</b>	<u>✓</u>	

301-114	Right of Entry	<u>X</u>	Not administratively complete. No right of entry for Township 14 South, Range 13 East, SE¼ SE¼ Sect. 10; NE¼ NE¼ Sect. 15; and a portion of Sect. 16.
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301-115	Status of Unsuitability Claims	<u>✓</u>	
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301-116	Permit Term	<u>✓</u>	
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301-117	....Insurance	<u>✓</u>	Not yet available. Consider administratively complete.
	....Proof of Publication	<u>✓</u>	
	....Facilities and Structures Used in Common	<u>✓</u>	

301-118	Filing Fee <span style="float: right;">✓</span>	
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**Comments**

301-123	Notarized Signature of Responsible Official <span style="float: right;">✓</span>	
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301-130	<b>Information Collection: Technical Data Accompanied by Names of Persons or Organizations that Collected and Analyzed the Data - Dates of Collections - and Analysis of the Data and Description of the Methodology Used to Collect and Analyze Data</b> <span style="float: right;">✓</span>	Appears to be administratively complete, but each section of the plan needs to be reviewed separately.
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301-200	Soils <span style="float: right;">✓</span>	
211	Description of Premining Soil Resources <span style="float: right;">✓</span>	
221	Prime Farmland Investigation <span style="float: right;">✓</span>	
222	Soil Survey <span style="float: right;">✓</span>	
224	Substitute Topsoil Info (When Proposed) <span style="float: right;">✓</span>	
230	Operation Plan: Topsoil Handling/Removal/Storage <span style="float: right;">✓</span>	
240	Reclamation Plan: Soil Redistribution/Stabilization <span style="float: right;">✓</span>	

			<b>Comments</b>
301-300	Biology	<u>X</u>	Not administratively complete.
320	Vegetation Information	<u>✓</u>	
322	Fish and Wildlife Information	<u>✓</u>	Administratively complete, but letter from FWS missing from Appendix 3-4.
323	Maps/Photos: Vegetation-Fish-Wildlife Areas	<u>✓</u>	
330	Operation Plan: Vegetation-Fish-Wildlife Protection	<u>X</u>	Cannot find information about water use. Unless this information is in the MRP, this section is not administratively complete.
341	Reclamation Plan for Revegetation	<u>✓</u>	Administratively complete, but see comments about experimental practices under §302-200 below.
342	Fish & Wildlife Plan for Reclamation Phase	<u>✓</u>	

301-400	Land Use and Air Quality	<u>✓</u>	
411	Pre-Mining Land Use Information (Includes Cultural Resources)	<u>✓</u>	
412	Post-Mining Land Use Information	<u>X</u>	Need comments from surface management agencies about postmining land use. Not administratively complete.
420	Air Quality	<u>✓</u>	

			<b>Comments</b>
301-500	Engineering	<u>✓</u>	

510 and 520	General Description of Operation Plan: (Maps, Locations, Cross-Sections, Narrative, Descriptions & Calculations) ✓	
522	Coal Recovery Description ✓	
523	Mining Methods ✓	
524	Blasting and Explosives Plan ✓	
525	Subsidence Control Plan ✓	
526	Mine Facilities Description (Narrative, Plans, Maps) Including Existing Structures & Support Facilities ✓	
527	Transportation Facilities (Including Plans & Maps) ✓	
528	Coal Mine Waste Plans (Description & Designs) ✓	
529	Management of Mine Openings (Design) ✓	
531	General Plans for Structures ✓	
532	Sediment Control ✓	
533	Impoundments ✓	

**Comments**

301-534	Roads (Plans, Drawings, Designs, & Specifications) ✓	
535	Spoil ✓	
536	Coal Mine Waste ✓	

537	Regraded Slopes	<u>✓</u>	
540 541-542	Reclamation Narrative, Maps and Plans	<u>✓</u>	
551	Casing and Sealing: Underground Openings	<u>✓</u>	
553	Backfilling and Grading Description	<u>✓</u>	

301-600	Geology	<u>✓</u>	
621	Description of Geology (Permit & Adjacent Area)	<u>✓</u>	
622	Geologic Cross-Sections, Maps, and Plans	<u>✓</u>	
630	Plans for Casing and Sealing Holes	<u>✓</u>	

**Comments**

301-700	Hydrology	<u>✓</u>	
721	Description of Hydrologic Resources: (Permit and Adjacent Area)	<u>✓</u>	
722	Cross-Sections and Maps: Subsurface Water - Surface Water - Monitoring Stations - Wells	<u>✓</u>	
723	Sampling and Analysis	<u>✓</u>	
724	Baseline Information: Ground Water - Surface Water - Geology - Climatological & Supplemental; If Needed	<u>✓</u>	

728	PHC Determination	<input checked="" type="checkbox"/>	
730	General Operation Plan: Minimize Disturbance to Hydrologic Balance & Compliance with Clean Water Act	<input checked="" type="checkbox"/>	
731	Ground and Surface Water Protection	<input checked="" type="checkbox"/>	
731	Ground and Surface Water Monitoring	<input checked="" type="checkbox"/>	

**Comments**

301-740	Plans and Designs: Operation and Reclamation Plan Sediment Control Measures	<input checked="" type="checkbox"/>	
	....Siltation Structures	<input checked="" type="checkbox"/>	
	....Sediment Ponds	<input checked="" type="checkbox"/>	
	....Other Treatment Facilities	<input checked="" type="checkbox"/>	
	....Diversions	<input checked="" type="checkbox"/>	
	....Road Drainage	<input checked="" type="checkbox"/>	
	....Impoundments	<input checked="" type="checkbox"/>	
	....Discharge Structures	<input checked="" type="checkbox"/>	
	....Disposal of Excess Spoil	<input checked="" type="checkbox"/>	
	....Coal Mine Waste	<input checked="" type="checkbox"/>	
	....Disposal of Non-Coal Mine Waste	<input checked="" type="checkbox"/>	
	....Casing and Sealing of Wells	<input checked="" type="checkbox"/>	

**Comments**

301-800	Bonding and Insurance	<u>✓</u>	
820	Applicant: Have Adequate Bond at Permit Issuance	<u>✓</u>	Adequacy of bond will be determined prior to issuance of the permit.
830	Bond Estimate and Calculations Provided	<u>✓</u>	
890	Certificate of Insurance Provided	<u>✓</u>	

302-200	Special Categories of Mining	<u>X</u>	Not administratively complete. See Experimental Practices Mining, §302-210, below.
210	Experimental Practices Mining	<u>X</u>	The applicant must organize experimental practices into one section within the Mining and Reclamation Plan (MRP). Other references and discussions may stay as they are. The success of this project hinges on approval of the projected experimental practices. Experimental practices have not been common in MRPs. The presence in the MRP of an organized, concise Experimental Practices section will make it easier for the Division and the U.S. Office of Surface Mining to do a more complete and timely review while coordinating their respective review efforts.
220	Mountaintop Removal Mining	<u>NA</u>	Not applicable.
230	Steep Slope Mining	<u>NA</u>	Not applicable.
240	Auger Mining	<u>NA</u>	Not applicable.
250	In Situ Processing Activities	<u>NA</u>	Not applicable.

		Comments
302-260	Coal Processing Plants (Not Located Within Permit Area of Mine) <span style="float: right;"><u>NA</u></span>	Not applicable.
270	Variances From Approximate Original Contour Restoration Requirements <span style="float: right;"><u>NA</u></span>	The applicant has applied for no variances from the regulatory requirement to restore the site to ACR.
280	Variances for Delay in Contemporaneous Reclamation Requirement in Combined Surface and Underground Coal Mining Activities <span style="float: right;"><u>NA</u></span>	Not applicable.
290	Small Operator Assistance Program (SOAP) <span style="float: right;"><u>NA</u></span>	Not applicable.

302-300	Special Areas of Mining <span style="float: right;"><u>NA</u></span>	Not applicable.
310	Prime Farmland <span style="float: right;"><u>✓</u></span>	
320	Alluvial Valley Floors <span style="float: right;"><u>✓</u></span>	