

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

OK

February 19, 2008

TO: Internal File

FROM: Priscilla Burton, CPSSc, Environmental Scientist, III. *PWB by an*

RE: Change in Ownership and Control, West Ridge Mine, C/007/0041, UtahAmerican Energy, Task ID #2920 and Crandall Canyon Mine, C/015/0032, UtahAmerican Energy, Task ID #2919

SUMMARY:

The applications provides the current name (Jim Hewlett) and South Jordan address of IPA's General Manager and the name (Aram Benyamin) of IPA's operating Agent who is designated as a representative to the Crandall Canyon Project and the West Ridge Project Management Boards.

This information should be approved and incorporated into the West Ridge Mining and Reclamation Plan (MRP). The same information was included in the recently approved Crandall Canyon Mine mid-term permit review (Task 2945), so Task 2919 was marked History in the Coal Tracking System.

In accordance with R645-301-111.114, the Division should request certification of the beginning and end date officer changes from the Secretary of the IPA organization.

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TECHNICAL ANALYSIS:

GENERAL CONTENTS

IDENTIFICATION OF INTERESTS

Regulatory Reference: 30 CFR 773.22; 30 CFR 778.13; R645-301-112

Analysis:

Section 9 of Appendix 1-7 was revised in February 2008 to report the current name (Jim Hewlett) and South Jordan address of IPA's General Manager and the name (Aram Benyamin) of IPA's operating Agent who is designated as a representative to the Crandall Canyon Project and the West Ridge Project Management Boards.

On February 19, 2008, I verbally requested, Secretary signature certifying these changes. The Permittee indicated that the Crandall Canyon Mine mid-term review response would have the Secretary signature. The mid-term response package arrived on March 7, 2008. It does not have Secretary certification of these IPA changes.

The Division should incorporate these changes into the MRP, but must also request certification of these changes by the Secretary of Intermountain Power Agency, in accordance with R645-301-111.114.

Findings:

The information provided partially meets the administrative requirements for ownership and control.

RECOMMENDATIONS:

The information received should be approved and incorporated into the West Ridge MRP. The same information was included in the recently approved Crandall Canyon Mine mid-term permit review (Task 2945), so Task 2919 was marked History in the Coal Tracking System.

The Division should incorporate these changes into the MRP, but must also request certification of these changes by the Secretary of Intermountain Power Agency.