

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

November 10, 2008

TO: Internal File

THRU: James D. Smith, Permit Supervisor *DS 11/12/08*

FROM: Wayne H. Western, Team Lead *w h w*

RE: Bear Canyon Gob Vent Hole Facility, West Ridge Resources Inc., West Ridge Mine, C/007/0041, Task ID #3077

SUMMARY:

On October 22, 2008, the Division received an amendment from West Ridge Resources Inc. to drill a gob vent holes over panel # 10. The holes are located on the Sunnyside 7.5 minuet quadrangle in Township 14 South Range 13 East, Sections 3 and 10. The holes are needed to lowering the percentage of methane gas in the mine. This memo will address engineering and bonding.

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TECHNICAL ANALYSIS:

ENVIRONMENTAL RESOURCE INFORMATION

Regulatory Reference: Pub. L 95-87 Sections 507(b), 508(a), and 516(b); 30 CFR 783., et. al.

PERMIT AREA

Regulatory Requirements: 30 CFR 783.12; R645-301-521.

Analysis:

The Permittee met the requirements of this section. The Permittee will not change the permit area. The Permittee will increase the disturbed area by 0.34 acres.

Findings:

The information provided in the proposed amendment is considered adequate to meet the requirements of this section.

MAPS, PLANS, AND CROSS SECTIONS OF RESOURCE INFORMATION

Regulatory Reference: 30 CFR 783.24, 783.25; R645-301-323, -301-411, -301-521, -301-622, -301-722, -301-731.

Analysis:

Existing Surface Configuration Maps

The Permittee met the requirements of this section. The Permittee provided the Division with Bear Canyon GVH Pre-Existing Site and Bear Canyon GVH Topsoil Storage Area that shows the existing contours at the drill hole site and topsoil storage area.

Well Maps

Findings:

The information provided in the proposed amendment is considered adequate to meet the requirements of this section.

OPERATION PLAN

ROAD SYSTEMS AND OTHER TRANSPORTATION FACILITIES

Regulatory Reference: 30 CFR Sec. 784.24, 817.150, 817.151; R645-301-521, -301-527, -301-534, -301-732.

Analysis:

Road Classification System

The Permittee met the requirements of this section. The Permittee will not construct any new roads. The Division considers that drill hole site to be a pad area. All runoff will be treated before it leaves the site.

Findings:

The information provided in the proposed amendment is considered adequate to meet the requirements of this section.

MAPS, PLANS, AND CROSS SECTIONS OF MINING OPERATIONS

Regulatory Reference: 30 CFR Sec. 784.23; R645-301-512, -301-521, -301-542, -301-632, -301-731, -302-323.

Analysis:

Mining Facilities Maps

The Permittee met the requirements of this section. The Permittee provided the Division with maps and cross section of drill hole site in Appendix 5-14. The maps and cross section show how the site will be constructed.

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Findings:

The information provided in the proposed amendment is considered adequate to meet the requirements of this section.

RECLAMATION PLAN

APPROXIMATE ORIGINAL CONTOUR RESTORATION

Regulatory Reference: 30 CFR Sec. 784.15, 785.16, 817.102, 817.107, 817.133; R645-301-234, -301-412, -301-413, -301-512, -301-531, -301-533, -301-553, -301-536, -301-542, -301-731, -301-732, -301-733, -301-764.

Analysis:

The Permittee met the requirements of this section. The Permittee will return the site to the approximate original contours. The Permittee backfill and grading plan is in Appendix 5-14. The Permittee will restore the area to the approximate original contours. Because of slopes are too steep to be reclaimed to the original angle, the Permittee will backfill some areas so that they will have a safety factor of 1.3.

Findings:

The information provided in the proposed amendment is considered adequate to meet the requirements of this section.

BACKFILLING AND GRADING

Regulatory Reference: 30 CFR Sec. 785.15, 817.102, 817.107; R645-301-234, -301-537, -301-552, -301-553, -302-230, -302-231, -302-232, -302-233.

Analysis:

General

The Permittee met the requirements of this section of the regulations. The backfilling and grading plan is in Appendix 5-14 of the MRP. The Permittee will reclaim the site to the approximate original contours. In order to meet the 1.3 safety factor the Permittee will decrease

the slopes to approximately a 1:1.5 slope. There are no spoil piles, coal piles, highwalls on the site. No depressions will exist at reclamation except for small pocks used to control erosion.

Findings:

The information provided in the proposed amendment is considered adequate to meet the requirements of this section.

MINE OPENINGS

Regulatory Reference: 30 CFR Sec. 817.13, 817.14, 817.15; R645-301-513, -301-529, -301-551, -301-631, -301-748, -301-765, -301-748.

Analysis:

The Permittee will plug the well openings when the wells are no longer needed.

Findings:

The information provided in the proposed amendment is considered adequate to meet the requirements of this section.

ROAD SYSTEMS AND OTHER TRANSPORTATION FACILITIES

Regulatory Reference: 30 CFR Sec. 701.5, 784.24, 817.150, 817.151; R645-100-200, -301-513, -301-521, -301-527, -301-534, -301-537, -301-732.

Analysis:

Reclamation

There are no new roads associated with the construction of the pad or top soil storage.

Retention

There are no new roads associated with the construction of the pad or top soil storage.

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Findings:

The information provided in the proposed amendment is considered adequate to meet the requirements of this section.

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:

Bonded Area Map

The Permittee met the requirements of this section. The Division considers that bonded areas are the same as the disturbed areas. Maps of the disturbed areas are in Appendix 5-14.

Reclamation Backfilling And Grading Maps

The Permittee met the requirements of this section. The Permittee provided maps and cross sections that show how the disturbed areas for the gob vent holes and topsoil storage areas will be backfilled and graded in Appendix 5-14.

Final Surface Configuration Maps

The Permittee met the requirements of this section. The Permittee provided maps and cross sections that show how the disturbed areas for the gob vent holes and topsoil storage areas will be backfilled and graded in Appendix 5-14. Those maps also show the final surface configuration.

Certification Requirements.

The Permittee met the requirements of this section. The Permittee had all required maps and cross sections certified.

Findings:

The information provided in the proposed amendment is considered adequate to meet the requirements of this section.

BONDING AND INSURANCE REQUIREMENTS

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

Analysis:

Determination of Bond Amount

The Division determined the reclamation costs based on information submitted by the Permittee. The Permittee provided those calculations. No bond adjustment is needed at this time.

Findings:

The information provided in the application is considered adequate to meet the minimum requirements of this section.

RECOMMENDATIONS:

The Division should approve the bond.