

# TECHNICAL MEMORANDUM

## Utah Coal Regulatory Program

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December 4, 2008

TO: Internal File

THRU: Jim Smith, Permit Supervisor *DS 12/04/08*

FROM: April A. Abate, Environmental Scientist II *AAA 12-4-08*

SUBJECT: Trailer Location, West Ridge Resources, Inc. (West Ridge), West Ridge Mine, Permit # 007/0041, Task #3088

### SUMMARY:

On November 25, 2008, the Division of Oil, Gas, and Mining (the Division) received an letter from West Ridge submitting updated copies of Map 5-5 – Surface Facility Map claiming to show the locations of trailers used as an office trailer and temporary locker spaces.

The amendment should not be approved for the following reasons:

- [R645-301-512, -301-521] The locations of the temporary locker space trailers are not clearly labeled on the legend of Map 5-5; therefore it cannot be discerned how many locker trailers are represented on the map. It is also unclear whether or not the office trailer is considered a “temporary structure”. The map should be modified to reflect more accurate labeling of the locker trailers.
- [R645-301-800.812.700/820.113/830.140] The Permittee should provide the Division with updated reclamation cost estimates that include the cost to reclaim the trailers if the trailers are to remain on the site once the mine goes into the reclamation phase. Line item inclusions to the bond calculations should be added to reflect the reclamation costs of the trailers.

**TECHNICAL MEMO**

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**TECHNICAL ANALYSIS:**

**OPERATION PLAN**

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

Regulatory Reference: 30 CFR Sec. 784.23; R645-301-512, -301-521.

**Analysis:**

**Mining Facilities Maps**

The Permittee does not meet the requirements of this section. The Permittee provided the Division with an updated Map 5-5 indicating in the cover letter that the map was updated to depict the office and locker room trailers. However, it was not clear on the legend of the map where the locker trailers were located.

**Findings:**

[R645-301-512, -301-521] The information provided in the proposed amendment is not considered adequate to meet the requirements of this section. All support facility structures (temporary or permanent) need to be clearly depicted on the map such that they are clearly marked on the legend.

**RECLAMATION PLAN**

**BONDING AND INSURANCE REQUIREMENTS**

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

**Analysis:**

**General**

The Permittee did not provide any calculations for the additional trailer structures to meet the requirements of this section.

**Findings:**

**[R645-301-800.812.700/820.113/830.140]** The Permittee shall provide the Division with updated reclamation cost estimates to be included in their performance bond provided that these structures remain on the site up until the site goes into its reclamation phase.

**RECOMMENDATIONS:**

The amendment should not be approved for the following reasons:

- **[R645-301-512, -301-521]** The locations of the temporary locker space trailers are not clearly labeled on the legend of Map 5-5; therefore it cannot be discerned how many locker trailers are represented on the map. It is also unclear whether or not the office trailer is considered a “temporary structure”. The map should be modified to reflect more accurate labeling of the locker trailers.
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