



**State of Utah**  
DEPARTMENT OF NATURAL RESOURCES

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January 4, 2008

Dave Shaver, Manager  
West Ridge Resources, Inc.  
P.O. Box 1077  
Price, Utah 84501

Subject: Midterm Permit Review, West Ridge Resources, Inc., West Ridge Mine, C/007/0041, Task ID #2692

Dear Mr. Shaver:

The Division reviewed the West Ridge Mining and Reclamation Plan (MRP) as part of the midterm review.

The Division has determined that there are some deficiencies that must be addressed as part of the midterm review in order for the MRP to comply with the R645 Coal Mining Rules. Those deficiencies are listed as an attachment to this letter.

Each deficiency identifies its author by that author's initials in parentheses, such that your staff can directly communicate with that individual should any questions arise relative to the preparation of West Ridge Resources' response to that particular deficiency. If you have any questions please call me at (801) 538-5268 or Wayne Western at (801) 538-5263.

Steve Fluke is no longer with the Coal Program. Please direct all comments about Steve's deficiencies to either Dana Dean or Wayne Western.

Sincerely,

Pamela Grubaugh-Littig  
Permit Supervisor

an  
attachment  
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**Deficiency List**  
**Task ID #2692**  
**Midterm Review**

The members of the review team include the following individuals:

Priscilla Burton      [pb]  
Steve Fluke            [smf]  
Wayne Western        [whw]

**R645-301-112**, The employer identification number is listed for only Murray Energy Corporation, but is required for all other owners and controllers. • According to the schematic in Appendix A, West Ridge Resources, Inc. is controlled by co-owners: Andalex Resources, Inc and the Intermountain Power Agency (I.P.A.). Andalex Resources, Inc. is wholly owned by UtahAmerican Energy, Inc., which is in turn wholly owned by Murray Energy Corporation. The MRP incorrectly states this arrangement in the second sentence of section 112.300, wherein West Ridge Resources is referred to as a wholly owned subsidiary of Andalex Resources Inc. [pb]

**R645-301-731.520, -751**, The current UPDES permit, effective May 1, 2006, needs to replace the old UPDES permit in Appendix 7-10 of the MRP. [smf]

**R645-301-742.310, -742.320**, The MRP indicates that mine water discharge of 0.51 cfs will be routed through ditches and into the sedimentation pond (Section 2.10 and Table 13 of Appendix 7-4). However, the mine is now discharging greater than 1 cfs, which is routed through the right fork bypass culvert at UC-EE as shown for UPDES 002 outfall on Map 7-2. Based on the culvert design summary (Table 7), the bypass culverts as constructed can easily handle the mine water discharge in addition to the calculated peak flow of a 100-year/6-hour precipitation event. The MRP needs to be updated to include the existing mine water discharge information and to indicate that the bypass culverts are adequately sized to handle the additional flow. [smf]

**R645-301-744.100**, The main canyon culvert discharge structure is designed to protect the natural channel from the discharge of a 100year/6-hour precipitation event plus sedimentation pond discharge of 100.01 cfs (Section 2.12 of Appendix 7-4). Because mine water is now discharging through the bypass culvert, the MRP should be updated to demonstrate that the rip-rap discharge structure is adequate to protect the natural channel from the additional flow. [smf]

**R645-301-830.110**, The Permittee must include a copy of the Division's reclamation cost estimate in the mining and reclamation plan. The Division requires that information be in the MRP so that the Permittee and public can have ready access to the reclamation cost estimates. The Division will provide the Permittee with a copy of the reclamation cost estimate upon request in either electronic or hard copy. [whw]