



**WEST RIDGE**  
RESOURCES, INC.

P.O. Box 910, East Carbon, Utah 84520  
Telephone (435) 888-4000 Fax (435) 888-4002

Utah Division of Oil, Gas & Mining  
Utah Coal Program  
1594 West North Temple, Suite 1210  
P.O.Box 145801  
Salt Lake City, UT 84114-5801

February 1, 2011

Attn: Daron Haddock  
Permit Supervisor

Re: West Ridge Mine C/007/041  
Permit Change for Longwall Panels North of Grassy Trail Reservoir  
Longwall Panel Block 18 thru 21  
Penta Creek Fee Lease Extension

Dear Mr. Haddock:

Enclosed are six (6 ea.) copies of a change to the West Ridge MRP. This change is to allow longwall mining within the newly-acquired Penta Creek Fee Lease Extension and federal lease UTU-78562 north of the Grassy Trail reservoir, and development mining within SITLA lease ML-51744. As you review this submittal please note the following:

- 1) As a result of this permit change the permit area would expand from 6761.29 acres to 7316.62 acres, increasing the permit area by 555.33 acres, or 8%.
- 2) BLM has recently approved the R2P2 for mining these longwall panels on federal lease 78562. In approving the longwall mine plan for this area, BLM stated, "*We agree with the conclusion that mining longwall panels 18 through 20 as submitted should have no adverse effects on the dam structure or reservoir. The dam structure has seen no detectable affects from the mining of panel number 7....The R2P2 modification is hereby approved...*"
- 3) Under this mine plan, the closest longwall mining of these panels would be more than 3000' away from the Grassy Trail dam, and stratigraphically 2200' lower than the reservoir. This is more than three times farther away from the dam (and 150% deeper) than mining associated with the extraction of longwall panel #7, which was approved by the Division on November 8, 2005, and was successfully mined in 2006.

File In C 0070041 Incoming  
Date: 02/01/2011 Refer to:  
0002

Confidential  
 Shelf  
 Expandable

For additional information

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Daron Haddock  
February 1, 2011  
page 2

- 4) All longwall mining in this area will be done using the new panel-barrier design, as opposed to side-by-side panel design as utilized during the mining of panel #7. This panel-barrier design has proven to dramatically reduce the amount and intensity of mining-induced seismicity and subsidence associated with longwall mining.
- 5) Under this mine plan there would be no longwall mining under any perennial streams.
- 6) SITLA has approved the mine plan for their portion of the permit change area.
- 7) There will be no surface disturbance associated with this mining.
- 8) All mining in this area would be under cover greater than 2000'. Average cover is approximately 2800', and maximum cover of over 3200'. Mining in this area would represent the deepest coal mining in the nation, perhaps the world.
- 19) The permit change area is included within the existing CHIA
- 10) This permit change area has been surveyed for raptors with negative finding.
- 11) The permit change area has been surveyed for archeology with negative findings.
- 12) There are no issues involving soils, biology, T & E species, archeology, or land use associated with the permit change area.
- 13) All mining in the this area will be under private (fee) surface, owned by Penta Creek, and leased to West Ridge Resources.

A map showing the location of the permit change relative to the existing permit area is attached to this letter for your review. Please note that the confidential archeology information and raptor information for this area is the same as what was submitted for the recent SITLA IBC which was approved and incorporated by your office on July 27, 2009.

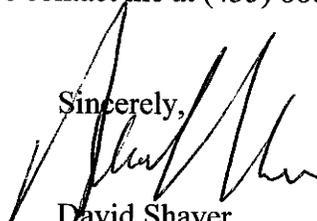
As has been reported recently in the media, West Ridge Resources (Utah American Energy, Inc.) is presently pursuing plans to relocate the Grassy Trail dam and reservoir. Construction of the new dam is supported by the municipalities of East Carbon City and Sunnyside City, as well as the Division of Dam Safety, because the existing dam was not built to current higher safety standards. This would extend the life of the mine by nearly 2 years, and allow us to maintain the existing workforce at present levels. Based on the increased coal production required to fulfill the newly acquired PacifiCorp contract (1,200,000 tons/year), and

Daron Haddock  
February 1, 2011  
page 2

the revised mine plan necessary to accommodate plans for re-locating the Grassy Trail dam/reservoir, timing for the development of the longwall gate entries is extremely critical. We therefore request an expedited review of this permit change application.

If you have questions or comments please contact me at (435) 888-4017.

Sincerely,

A handwritten signature in black ink, appearing to read 'David Shaver', written over the word 'Sincerely,'.

David Shaver  
Resident Agent

## APPLICATION FOR PERMIT PROCESSING

<input type="checkbox"/> Permit Change	<input type="checkbox"/> New Permit	<input type="checkbox"/> Renewal	<input type="checkbox"/> Transfer	<input type="checkbox"/> Exploration	<input type="checkbox"/> Bond Release	Permit Number: <b>C/007/041</b>
Title of Proposal: <b>Change to the MRP to allow longwall mining in panel block 18-21 within the Penta Creek fee lease.</b>						Mine: <b>WEST RIDGE MINE</b>
						Permittee: <b>WEST RIDGE Resources, Inc.</b>

Description, include reason for application and timing required to implement.

**Instructions:** If you answer yes to any of the first 8 questions (gray), submit the application to the Salt Lake Office. Otherwise, you may submit it to your reclamation specialist.

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	1. Change in the size of the Permit Area? <b>555.33</b> acres Disturbed Area? <b>no</b> acres <input checked="" type="checkbox"/> increase <input type="checkbox"/> decrease.
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	2. Is the application submitted as a result of a Division Order?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	3. Does application include operations outside a previously identified Cumulative Hydrologic Impact Area?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	4. Does application include operations in hydrologic basins other than as currently approved?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	5. Does application result from cancellation, reduction or increase of insurance or reclamation bond?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	6. Does the application require or include public notice/publication?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	7. Does the application require or include ownership, control, right-of-entry, or compliance information?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	8. Is proposed activity within 100 feet of a public road or cemetery or 300 feet of an occupied dwelling?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	9. Is the application submitted as a result of a Violation?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	10. Is the application submitted as a result of other laws or regulations or policies? Explain:
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	11. Does the application affect the surface landowner or change the post mining land use?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	12. Does the application require or include underground design or mine sequence and timing?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	13. Does the application require or include collection and reporting of any baseline information?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	14. Could the application have any effect on wildlife or vegetation outside the current disturbed area?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	15. Does application require or include soil removal, storage or placement?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	16. Does the application require or include vegetation monitoring, removal or revegetation activities?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	17. Does the application require or include construction, modification, or removal of surface facilities?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	18. Does the application require or include water monitoring, sediment or drainage control measures?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	19. Does the application require or include certified designs, maps, or calculations?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	20. Does the application require or include subsidence control or monitoring?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	21. Have reclamation costs for bonding been provided for?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	22. Does application involve a perennial stream, a stream buffer zone or discharges to a stream?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	23. Does the application affect permits issued by other agencies or permits issued to other entities?

Attach **3** complete copies of the application.

I hereby certify that I am a responsible official of the applicant and that the information contained in this application is true and correct to the best of my information and belief in all respects with the laws of Utah in reference to commitments, undertakings, and obligations, herein. (R645-301-123)

Signed - Name - Position - Date  
*Linda Kerns* 1/31/2011  
 agent

Subscribed and sworn to before me this 31 day of January, 2011.

Notary Public  
**LINDA KERNS**  
 Commission #578211  
 My Commission Expires  
 March 27, 2013  
 State of Utah

My Commission Expires: March 27, 2013  
 Attest: STATE OF UTAH COUNTY OF CARBON

Received by Oil, Gas & Mining  
RECEIVED  
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ASSIGNED TRACKING NUMBER

## Application for Permit Processing Detailed Schedule of Changes to the MRP

1 of 2

Title of Application:  
Change to the MRP to allow longwall mining in panel block 18-21  
within the Penta reek fee lease

Permit Number: C/007/041

Mine: WEST RIDGE MINE

Permittee: WEST RIDGE RESOURCES

Provide a detailed listing of all changes to the mining and reclamation plan which will be required as a result of this proposed permit application. Individually list all maps and drawings which are to be added, replaced, or removed from the plan. Include changes of the table of contents, section of the plan, pages, or other information as needed to specifically locate, identify and revise the existing mining and reclamation plan. Include page, section and drawing numbers as part of the description.

			DESCRIPTION OF MAP, TEXT, OR MATERIALS TO BE CHANGED
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Chapter 1: all text
<input type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Chapter 5: pgs 5-iv, 5-v, 5-8, 5-10, 5-15, 5-26 thru 5-29
<input type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Chapter 7: pgs 7-v, 7-5, 7-6, 7-16 thru 7-31
<input type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	
<input checked="" type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Appendix 5-3C: BLM RZP2 Approval
<input type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	
<input type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Appendix 5-10: SITLA mine plan approval
<input type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	
<input checked="" type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Appendix 5-16: Grassy Trail Dam Seismicity Report 2008 RB+G
<input type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	
<input checked="" type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Appendix 5-17: Grassy Trail Dam Seismicity Update Report 2010 RB+G
<input type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Appendix 7-5, Water Rights Summary
<input type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	
<input checked="" type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Appendix 7-6A, 1999 + 2010 Seep/Spring Survey
<input type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	
<input type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	

Any other specific or special instructions required for insertion of this proposal into the Mining and Reclamation Plan?

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## Application for Permit Processing Detailed Schedule of Changes to the MRP

2 of 2

Title of Application: **Change to the MRP to allow longwall mining in panel block 18-21 within the Penta reek fee lease**

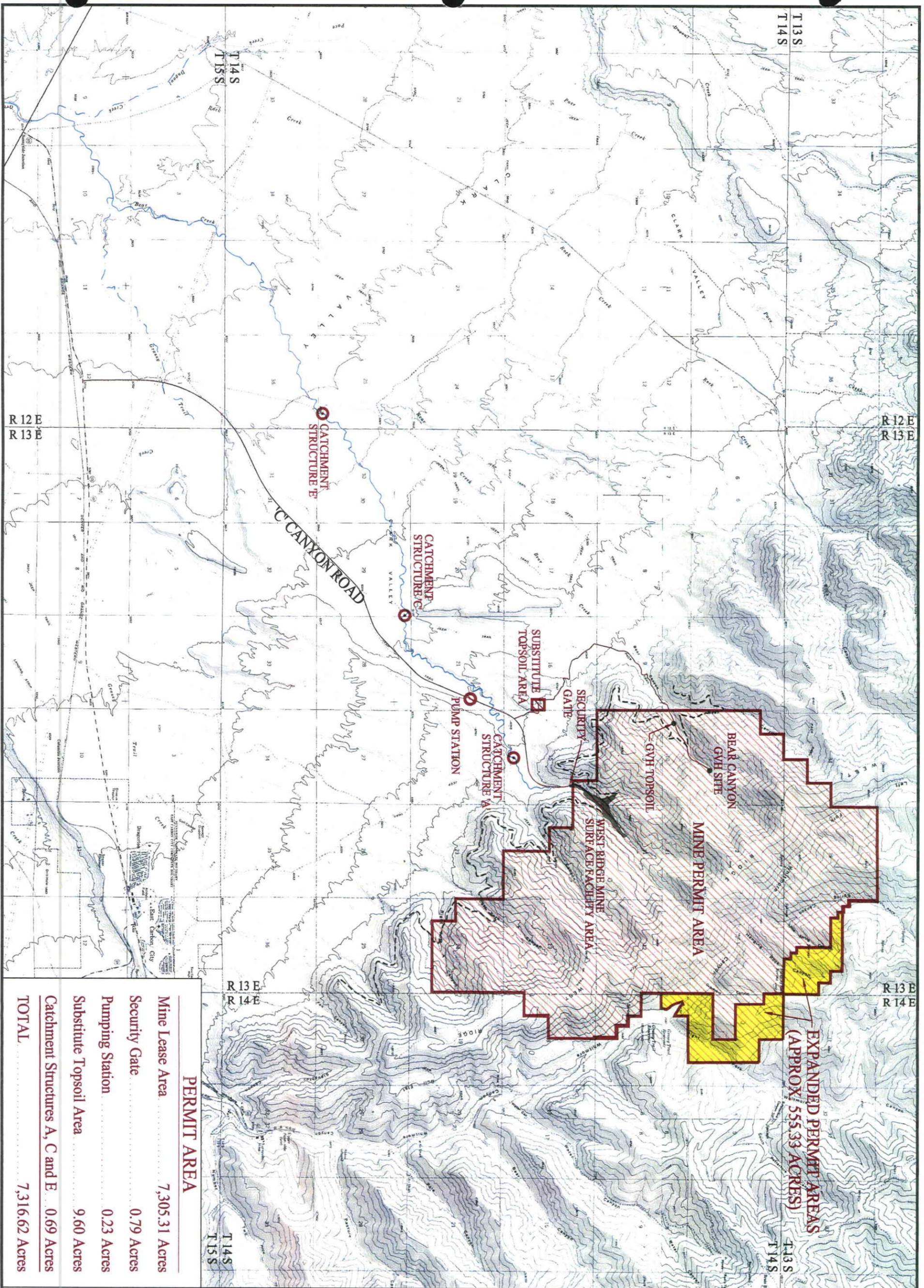
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			DESCRIPTION OF MAP, TEXT, OR MATERIALS TO BE CHANGED
<input checked="" type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	<i>Confidential Information; to be added to Confidential Binder after review:</i>
<input type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	
<input type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	
<input type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	
<input checked="" type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	<i>Archaeology Report, Seneca-Phoenix</i>
<input type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	
<input checked="" type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	<i>Raptor Survey, E.I.S.</i>
<input type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	
<input type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	<i>Maps: 1-0/1-1, 2-1, 3-1, 3-4A, 3-4B, 3-4C, 3-4D, 4-1, 4-2, 5-2, 5-3, 5-4A, 5-4B, 5-7, 6-1, 6-2, 6-3, 7-3, 7-5, 7-6, 7-7</i>
<input type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	
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<input type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	

Any other specific or special instructions required for insertion of this proposal into the Mining and Reclamation Plan?

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PERMIT AREA	
Mine Lease Area	7,305.31 Acres
Security Gate	0.79 Acres
Pumping Station	0.23 Acres
Substitute Topsoil Area	9.60 Acres
Catchment Structures A, C and E	0.69 Acres
<b>TOTAL</b>	<b>7,316.62 Acres</b>

**WEST RIDGE MINE**  
 Map 1-0, Permit Map  
 Map 1-1, Location Map

**LEGEND:**  
 Lease Areas ————  
 Surface Facility Area ————  
 GVH Site ●  
 Outcrop - - - - -



I CERTIFY THIS MAP TO BE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE.



**WEST RIDGE**  
 RESOURCES, INC.

SCALE: 1"=5000'