#3894
OK

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

October 13, 2011

TO: Internal File

THRU: Ingrid Campbell, Biologist and Team Lead IC

FROM: James Owen, Reclamation Engineer JO

RE: Change to Allow Extraction of Longwall Panel 22, West Ridge Resources, INC., West Ridge Mine, C0070041, Task #3894

SUMMARY:

On August 09, 2010 the Utah Division of Oil Gas & Mining received an application for an amendment to the West Ridge Mining and Reclamation Plan (MRP). The amendment is for the purpose of allowing extraction of "Longwall Panel 22". The change would add 273.43 acres to the existing permit. The applicant states that Panel 22 will be the last longwall panel to be developed in the down-dip section of the northeastern-most portion of the mine workings.

This memo addresses compliance with the engineering (R645-301-500) section of the Utah Coal Mining Rules.

TECHNICAL ANALYSIS:

OPERATION PLAN

SUBSIDENCE CONTROL PLAN

Regulatory Reference: 30 CFR 784.20, 817.121, 817.122; R645-301-521, -301-525, -301-724.

Analysis:

The applicant states that there will be no longwall mining beneath the Right Fork of Whitmore Canyon. The only mining under the Right Fork will be the development entries associated with the longwall bleeder system.

The development entries proposed under the current application are expected to be plus 2700' in depth. The applicant states that there would be no new surface disturbance as a result of the permit change. In addition the applicant states that little or no subsidence of the land surface is anticipated as a result of the proposed mining operation (likely a few inches or less).

Because only full-support development mining techniques will be used beneath Right Fork, no subsidence of the stream bed is anticipated. The company acknowledges that concerns have been raised by stakeholder regarding proposals for mining under Right Fork. In deference to these concerns, the company proposes to continue with additional baseline monitoring measures, including:

c) Installation of survey elevation monitoring stations at 100' intervals along the bottom of the Right Fork drainage within the permit area.

Map 5-7 Subsidence Map was included with the application. The area above Panel 22 is designated at a "possible subsidence area". It should be noted that within the 2010 Annual Report submitted to the Division, the mine monitored and reported results for upwards of 2500 monitoring points.

Findings:

Contents and information provided are not sufficient enough to meet the minimum requirements of this section of the Utah Coal Mining Rules. The following deficiencies were identified:

- **R645-301.525.440.** The Division requests that the applicant submit an additional map or an amended version of Map 5-7 to include the locations of the photogrammetric subsidence monitoring points used for annual subsidence surveys. Point labels are not required. An updated map including monitoring station locations (and not just control point locations) will allow the Division to conduct a more thorough analysis of subsidence monitoring adequacy for areas that may be subsided as a result of mining Panel 22.

- **R645-301.525.440; 525.490**. The Division requests that the applicant submit an additional map, at an appropriate scale, to identify the locations of the "survey elevation monitoring stations at 100' intervals along the bottom of the Right Fork drainage within the permit area". In addition, the applicant must submit a complete description of the monitoring system, i.e. instruments used for monitoring, frequency and duration of monitoring, and frequency, method, and format which survey information will be provided to the Division.

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:

All included maps were appropriately certified and scaled.

Findings:

Contents and information provided are sufficient enough to meet the minimum requirements of this section of the Utah Coal Mining Rules.

RECOMMENDATIONS:

The amendment is not recommended for approval at this time.