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State of Utah

DEPARTMENT OF NATURAL RESOURCES

MICHAEL R. STYLER
Executive Director

Division of Oil, Gas and Mining

JOHN R. BAZA
Division Director

February 23, 2017

Karin Madsen, Resident Agent
West Ridge Resources, Inc.
P.O. Box 910
East Carbon, Utah 84520-0910

Subject: Midterm Completion Response, West Ridge Resources, Inc., West Ridge Mine, C/007/0041, Task ID #5347

Dear Ms. Madsen:

The Division has reviewed your application. The Division has identified deficiencies that must be addressed before final approval can be granted. The deficiencies are listed as an attachment to this letter.

The deficiencies authors are identified so that your staff can communicate directly with that individual should questions arise. The plans as submitted are denied. Please resubmit the entire application by no later than March 31, 2017.

If you have any questions, please call me at (801) 538-5325.

Sincerely,

Daron R. Haddock
Coal Program Manager

DRH/sqs

O:\007041.WR\WG5347 MIDTERM COMP RESPONSE\Deficiencies.doc





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Technical Analysis and Findings
Utah Coal Regulatory Program

PID: C0070041
TaskID: 5347
Mine Name: WEST RIDGE MINE
Title: MIDTERM COMPLETION RESPONSE

Reclamation Plan

Topsoil and Subsoil

Deficiencies Details:

The Mining and Reclamation Plan does not meet the soils performance standards.
In accordance with R645-301-250, Appendix 5-15 p. 14, must state that Catch Basin A was reclaimed in October 2016.

pburton

Bonding Determination of Amount

Deficiencies Details:

The midterm review of the amendment to update the MRP is deficient and does not meet the minimum requirements of R645-301-830 due to missing and incorrect information. Please submit correct and complete bonding sheets with support documentation. Including the following.

1. Red line any changes from the previous approved MRP so it is easier to identify the difference.
2. Please include 3 current (2016) bids for the following or any other cost that need bids:
 - City Sanitation Price county
 - Reveg002
 - Reveg001
 - JennChem - Seal Portal
 - Nielson Construction - haul
 - WestRidge007411
 - WestRidge007412
 - WestRidge007413
 - WestRidge007414
 - WestRidge007416
 - WestRidge007417
 - Nature Hill -Doug Fir Transplant
 - JennChem-Labor
 - Nielson Construction Plug well
3. All sheets need to have all references (RSMean and sources) Referenced on each line item.
4. I also found quite a few calculation for CF (Cubic Feet) and CY (Cubic Yard) and swell factor errors throughout the Demo Workbook that need to be corrected and updated. (Swell factor times (*) CF = CF

with swell factor). $CY = CF / 27$. When and if swell factor is included in the CY then formula for Cubic yard is Cubic Foot times (*)swell factor divided (/) by 27=CY. Example: sheet named ShopWarehouse01 had Length (L) = 160, Width (W)= 60 Heigh (H)= 30 so $L * W * H = 288000$ CF. CF with swell factor (0.33) is 95040, and CY with swell factor is 3520, and CY without swell factor is 10667. Please update all calculations as needed.

5. I am Missing the B Canyon Portal Reclamation sheet. If something has changed indicate it with red lines and provide support documentation why the change was made.

6. The Escalation Factor for 2016 is 0.7% or .007. Please update the escalation factor to .007 for 5 years out to 2021.

7. Double check the subtotals and totals on each sheet to insure that they are calculating everything they should be.

8. Make sure all line items are included or removed as needed. example DOGM bonding sheet "Reclaim Conveyor Stringers 10" has a City services with 59 CY. and it doesn't match West Ridge submitted sheets and I don't know why or if it is suppose to be there, are we missing a reclamation amount or is it an error that shouldn't be there? Please Identify each of the line items and calculations so all numbers and line items are correct and updated as needed. Provide support documents for any changes that are made.

bwiser