



GARY R. HERBERT  
Governor

SPENCER J. COX  
Lieutenant Governor

# State of Utah

## DEPARTMENT OF NATURAL RESOURCES

MICHAEL R. STYLER  
Executive Director

### Division of Oil, Gas and Mining

JOHN R. BAZA  
Division Director

July 18, 2017

David Hibbs, President  
UtahAmerican Energy, Inc.  
P. O. Box 910  
East Carbon, Utah 84520-0910

Subject: Administrative Completeness Review for Post Mining Land Use Change and Revision of MRP to Remove Gob Vent Hole Project ("GVH Project") , West Ridge Resources, Inc., West Ridge Mine, C/007/041, Task #5464

Dear Mr. Hibbs:

The above-referenced revision has been reviewed and determined to be administratively complete. A copy of our review worksheet is enclosed for your information and records.

A technical review of your plan has been initiated. Technical deficiencies will be forwarded to you as reviews are completed. The Division will also coordinate with other agencies and incorporate their comments into our review process. Issues raised will need to be resolved prior to final approval.

At this time you should publish a Notice of Complete Application for changing the Post Mining Land Use and Final Bond Release for the Gob Vent Hole Project Area as required by R645-300-121 and R645-301-880.120. A copy of the Affidavit of Publication should be sent to the Division as soon as it is available. You should also insure that a copy of the application is on file at the appropriate County Courthouse. The Division will complete a technical analysis, which must find that the application is technically complete. An inspection will need to be conducted at the site in the near future to verify the site conditions.

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

Sincerely,

Daron R. Haddock  
Coal Program Manager

DRH/sqs  
enclosure  
O:\007041.WR\WG5464 PMLU\ACRLETTER.DOC



**ADMINISTRATIVE COMPLETENESS REVIEW WORKSHEET  
(R645-100)**

**DATE:** July 18, 2017

**REVIEWER(S):** Priscilla Burton, Suzanne Steab, Joe Helfrich, Justin Eatchel, Daron Haddock

**APPLICANT:** West Ridge Resources, Inc.

**MINE NAME:** West Ridge Mine **FILE NO.:** C/007/041

**"Administratively Complete Application"** means an application for permit approval or approval for coal exploration, where required, which the Division determines to contain information addressing each application requirement of the State Program and to contain all information necessary to initiate processing and public review.

**Directions:** The categories listed below correspond to the minimum requirements for information necessary to initiate processing and public review. If a category is checked the Applicant has met the Completeness requirement for that category. If a category is not checked, the Completeness requirements have not been met. If a category is Not Applicable, enter NA in check box. The comments column will identify the deficiency and what is necessary to correct it.

			<b>Comments</b>
301-112	Identification of Interests	<u>X</u>	The application contains a description of the proposed project which is to change the post-mining land use of approximately .32 acres of land associated with 5 gob vent boreholes that are no longer going to be used by the West Ridge mine. WEST RIDGE Resources, Inc. P.O. Box 910 East Carbon, Utah 84520 (435) 888-4000 David Hibbs - President Employer Identification Number: 87-0585129
100	Applicant's Business Structure	<u>X</u>	West Ridge Resources, Inc. ("WRR"), a Utah corporation, is the owner and operator of the West Ridge Coal Mine ("Mine"), MRP No. 007/0041 ("MRP"), in Carbon County, Utah.
210	Applicant's Name/Address/Phone	<u>X</u>	WEST RIDGE Resources, Inc. P.O. Box 910 East Carbon, Utah 84520 (435) 888-4000 David Hibbs - President Employer Identification Number: 87-0585129
220	Resident Agent's Name/Address/Phone	<u>X</u>	Karin Madsen WEST RIDGE Resources, Inc. P.O. Box 910 East Carbon, Utah 84520 (435) 888-4000
230	Name/Address/Phone of AML Fees Payer	<u>X</u>	WEST RIDGE Resources, Inc. P.O. Box 910 East Carbon, Utah 84520 (435) 888-4000

300	Corporate Structure & Ownership	<u>X</u>	WEST RIDGE Resources, Inc. is the permittee and operator of the WEST RIDGE Mine. WEST RIDGE Resources, Inc. is a wholly owned subsidiary of ANDALEX Resources, Inc.. WEST RIDGE Resources, Inc. is a Utah corporation licensed to do business in the State of Utah. All leases associated with the WEST RIDGE Mine are owned by ANDALEX Resources, Inc. ANDALEX Resources, Inc, is a wholly owned subsidiary of UtahAmerican Energy Inc., which in turn is a wholly owned subsidiary of Murray Energy Corporation.
400	Identify Other Mining Operations in US	<u>NA</u>	This application is for changing a post mining land use and subsequent final bond release on .32 acres. Other mining operation in the U. S. are irrelevant.
500	Surface & Mineral Ownership	<u>X</u>	SITLA is the surface and mineral owner of the lands involving the Gob Vent Boreholes and the change in post mining land use.
600	Ownership Contiguous to Permit	<u>X</u>	The owners of contiguous property have not changed and are identified in Chapter 1 of the application
700	MSHA Numbers	<u>NA</u>	
800	Interest in Contiguous Lands	<u>X</u>	There are no contiguous lands with pending interest.

301-113	Violation Information	<u>X</u>	
100	AVS Violation Evaluation	<u>X</u>	A permit evaluation report was generated on the AVS on July 13, 2017. No violations were listed.
200	Suspension or Revocation Information	<u>NA</u>	
300	List of Violations - <b>3 Previous Years</b>	<u>X</u>	There are no outstanding violations at West Ridge. The new entity that is taking over the drill holes will not be a coal mining or reclamation operation.

301-114	Right of Entry	<u>X</u>	WRR has entered into an agreement, dated February 27, 2017, to sell the GVH Project to Global Carbon Strategies Corporation ("GCS") SITLA has entered a lease agreement with GCS to allow them to recover the methane from the 5 gob vent boreholes.
301-115	Status of Unsuitability Claims	<u>NA</u>	
301-116	Permit Term	<u>NA</u>	
301-117	Insurance	<u>X</u>	WRI has provided a draft public notice that will be advertised in the local paper for 4 consecutive weeks.
	Proof of Publication	<u>X</u>	
	Facilities and Structures Used in Common	<u>NA</u>	
301-118	Filing Fee	<u>NA</u>	
301-123	Notarized Signature of Responsible Official	<u>X</u>	David Hibbs signed the application letter. Karen Madsen , resident agent, signed the C1 form which was also notarized.
301-130	Information Collection: <b>Technical Data Accompanied by Names of Persons or Organizations that Collected and Analyzed the Data - Dates of Collections - and Analysis of the Data and Description of the Methodology Used to Collect and Analyze Data</b>	<u>NA</u>	
301-200	Soils	<u>X</u>	PMLU application Ex. A & B
211	Description of Pre-mining Soil Resources	<u>NA</u>	

221	Prime Farmland Investigation	<u>NA</u>	
222	Soil Survey	<u>NA</u>	
224	Substitute Topsoil Info (When Proposed)	<u>NA</u>	
230	Operation Plan <b>Topsoil Handling/Removal/Storage</b>	<u>X</u>	PMLU plan remains the same, refer to Ex A & Ex B
240	Reclamation Plan <b>Soil Redistribution/Stabilization</b>	<u>X</u>	Relevant operation reclamation plans described in MRP Appendices 14 and 14A will be adopted by CGS and incorporated by reference in the ER Projects Permits and Approvals (Correspondence from Dave Hibbs 6/8/2017, p. 6 and p. 12, item #3.)

301-300	Biology	<u>X</u>	GVH site information has been removed from chapter three of the MRP.
320	Vegetation Information	<u>X</u>	Appendix 3-13 Vegetation of the Bear Canyon GVH site Mt. Nebo Scientific has been removed from the MRP as well as any references to the GVH site in chapter three including Appendices 3-1, 3-1A and 5-14
322	Fish and Wildlife Information	<u>X</u>	Plates 3-1 Vegetation, 3-4B Deer, 3-4CElk and 3-4D Antelope have been updated and are included in the application
323	Maps/Photos <b>Vegetation-Fish-Wildlife Areas</b>	<u>X</u>	Page iii has been revised to not that plates 3-1 Vegetation, 3-4B Deer, 3-4CElk and 3-4D Antelope have been updated and are included in the application
330	Operation Plan <b>Vegetation-Fish-Wildlife Protection</b>	<u>X</u>	Pages 3-1-4 have been revised to include the removal of any references to the GVH site in this section of chapter three.
341	Reclamation Plan for Revegetation	<u>X</u>	Pages 3-1-4 have been revised to include the removal of any references to the GVH site in this section of chapter three.
342	Fish & Wildlife Plan for Reclamation Phase	<u>X</u>	Pages 3-1-4 have been revised to include the removal of any references to the GVH site in this section of chapter three.

301-400	Land Use and Air Quality	<u>X</u>	The application states that transfer of the GVH facility (and closure of the APA) is contingent upon the posting of reclamation bonds as described in Sec 8 of the SITLA Lease Agreement (\$15,000). This amount differs from the bonding expectation (\$75,000) stated by SITLA in their correspondence with the Division on July 10, 2017 (p. 2, para 4). This discrepancy must be cleared up for the record.
411	Pre-Mining Land Use Information <b>(Includes Cultural Resources)</b>	<u>X</u>	Exhibit A & B
412	Post-Mining Land Use Information	<u>X</u>	Change to Commercial PMLU. The GVH wells will be utilized for commercial activity by Global Carbon Strategies Corporation, under SITLA lease.

301-500	Engineering	<u>X</u>	
510 520	General Description of Operation Plan <b>(Maps, Locations, Cross-Sections, Narrative, Descriptions &amp; Calculations)</b>	<u>X</u>	Narrative describing general operating practices is included. Historical narrative provides context behind catchments and reopening of previously reclaimed B portal. Maps and cross sections also provided.
522	Coal Recovery Description	<u>X</u>	An R2P2 was submitted and approved by the BLM. BTCA utilized to maximize utilization as well as maintain environmental integrity.
523	Mining Methods	<u>X</u>	Considered an average sized underground longwall mine by Utah standards, West Ridge uses one longwall and two continuous miners.
524	Blasting and Explosives Plan	<u>X</u>	A blasting plan is in place, although blasting will not be used as a method of coal extraction.
525	Subsidence Control Plan	<u>X</u>	No structures exist anywhere on the permit area. Due to the depth of cover (1,800' - 2,500'), a minimum of subsidence is expected and a PHC report concluded that hydrology would not be adversely affected.
526	Mine Facilities Description <b>(Narrative, Plans, Maps) Including Existing Structures &amp; Support Facilities</b>	<u>X</u>	A detailed description of surface facilities is included together with an associated plan view in map 5-5.
527	Transportation Facilities <b>(Including Plans &amp; Maps)</b>	<u>X</u>	Narrative describing all roads within and adjacent to the permit area is included in map 4-1.

528	Coal Mine Waste Plans <b>(Description &amp; Designs)</b>	<u>X</u>	West Ridge has no plans to wash or process coal, therefore whatever minor amounts of waste coal produced will be either left underground or hauled to the Wildcat loadout facility.
529	Management of Mine Openings <b>(Design)</b>	<u>X</u>	A description of sealing and reclamation plans for the four portals on site is included.
531	General Plans for Structures	<u>X</u>	Reclamation plan states that structures on site are to be demolished and removed from the property.
532	Sediment Control	<u>X</u>	Catchment structures were built to deal with unauthorized discharge of coal fines, and have since been reclaimed. A main sedimentation pond was built to treat all other mine runoff. Maps and cross sections of the main sedimentation pond are included in maps 7-4, 7-4a.
533	Impoundments	<u>X</u>	A detailed narrative is included describing the location and function of the main sedimentation pond. Detailed maps and cross sections are included in maps 7-4, 7-4a.

301-534	Roads <b>(Plans, Drawings, Designs, &amp; Specifications)</b>	<u>X</u>	A detailed narrative is included along with a map showing primary road designs in map 5-15.
535	Spoil	<u>X</u>	No excess spoil is proposed nor anticipated for the underground coal mine development.
536	Coal Mine Waste	<u>X</u>	West Ridge has no plans to wash or process coal, therefore whatever minor amounts of waste coal produced will be either left underground or hauled to the Wildcat loadout facility.
537	Regraded Slopes	<u>X</u>	Fills utilized during the operational phase of mining will be regraded back to approximate original contour.
540 541-542	Reclamation Narrative, Maps and Plans	<u>X</u>	A detailed narrative with accompanying maps and plans is included. An exhaustive reclamation description is included in appendix 5-5.
551	Casing and Sealing <b>Underground Openings</b>	X	Four portals will be sealed with concrete blocks and backfilled when no longer needed for mining or monitoring purposes. Map 5-9 depicts the final reclaimed surface configuration.

553	Backfilling and Grading Description	<u>X</u>	Upon final cessation of coal mining activities, all areas will be regraded to AOC. Map 5-9 depicts the final reclaimed surface configuration.
-----	-------------------------------------	----------	---

301-600	Geology	<u>X</u>	The geology of this area has been well documented by the West Ridge Mine. Well logs are found in Appendix 6-2. As the post mining land use is changing from a mining operation to a methane destruction facility the requirement of SMCRA will not apply to this facility.
621	Description of Geology (Permit & Adjacent Area)	<u>X</u>	The geology of this area is described in the Application on Map 6-1 Regional Geology
622	Geologic Cross-Sections, Maps, and Plans	<u>X</u>	Map 6-3 shows the Lower Sunnyside seam isopachs. The seam in the area of the Gob Vent Holes is at an elevation of between 6700 and 6800 feet.
630	Plans for Casing and Sealing Holes	<u>X</u>	The gob vent boreholes will become the property and responsibility of GCS and will no longer be part of the West Ridge mining permit. SITLA will become the regulatory authority and will hold a bond for final reclamation and plugging of the wells. All drill holes from previous exploration activities have already been sealed to the surface with cement and reclaimed. Any future drill holes will be sealed with cement to within one foot of the surface. The remainder of the hole will then be filled with local fill materials to allow regrowth of vegetation over the site. All drill holes will meet the specifications set forth by the State Engineer and the Division of Water Rights as required. A licensed driller will perform the work of sealing the drill holes.

301-700	Hydrology <span style="float: right;"><u>X</u></span>	<p>The gob vent boreholes will become the property and responsibility of GCS and will no longer be part of the West Ridge mining permit. SITLA will become the regulatory authority and will hold a bond for final reclamation and plugging of the wells. SITLA would assume the regulatory authority over the site and insure the final reclamation following the termination of operations.</p> <p>The Permittee is proposing to remove the hydrologic information within the existing MRP relative to the gob vent hole (GVH) facility in Bear Canyon (i.e. Probable hydrologic consequences discussion within main portion of Chapter 7, Appendix 7-11: PHC report, Appendix 7-12: Surface Drainage report) and revise all hydrologic plates/maps that depict the Bear Canyon GVH facility.</p> <p>As a result, the completeness of the post-mining land use application for the following sub-sections of the State of Utah R6545 rules is not applicable. The post-mining land use application effectively removes the Bear Canyon GVH facility from the MRP.</p>
721	Description of Hydrologic Resources <b>(Permit and Adjacent Area)</b> <span style="float: right;"><u>X</u></span>	NA
722	Cross-Sections and Maps <b>Subsurface Water - Surface Water - Monitoring Stations - Wells</b> <span style="float: right;"><u>X</u></span>	NA
723	Sampling and Analysis <span style="float: right;"><u>X</u></span>	NA
724	Baseline Information <b>Ground Water - Surface Water - Geology - Climatological &amp; Supplemental; If Needed</b> <span style="float: right;"><u>X</u></span>	NA
728	PHC Determination <span style="float: right;"><u>X</u></span>	NA
730	General Operation Plan <b>Minimize Disturbance to Hydrologic Balance &amp; Compliance with Clean Water Act</b> <span style="float: right;"><u>X</u></span>	NA
731	Ground and Surface Water Protection <span style="float: right;"><u>X</u></span>	NA
732	Sediment Control Measures <span style="float: right;"><u>X</u></span>	NA

301-740	Plans and Designs <b>Operation and Reclamation Plan Sediment Control Measures</b>	<u>X</u>	NA
	Siltation Structures	<u>X</u>	NA
	Sediment Ponds	<u>X</u>	NA
	Other Treatment Facilities	<u>X</u>	NA
	Diversions	<u>X</u>	NA
	Road Drainage	<u>X</u>	NA
	Impoundments	<u>X</u>	NA
	Discharge Structures	<u>X</u>	NA
	Disposal of Excess Spoil	<u>X</u>	NA
	Coal Mine Waste	<u>X</u>	NA
	Disposal of Non-Coal Mine Waste	<u>X</u>	NA
	Casing and Sealing of Wells	<u>X</u>	NA

301-800	Bonding and Insurance	<u>X</u>	
820	Applicant <b>Have Adequate Bond at Permit Issuance</b>	<u>X</u>	Currently a proposal is underway to remove a \$67,000 structure from the bond due to an impending change in PMLU. The bond amount is under determination at this time, and is being revised with the assistance of a third party (EarthFax).
830	Bond Estimate and Calculations Provided	<u>X</u>	Currently a proposal is underway to remove a \$67,000 structure from the bond due to an impending change in PMLU. The bond amount is under determination at this time, and is being revised with the assistance of a third party (EarthFax).
890	Certificate of Insurance Provided	<u>NA</u>	

302-200	Special Categories of Mining	<u>NA</u>	
210	Experimental Practices Mining	<u>NA</u>	
220	Mountaintop Removal Mining	<u>NA</u>	
230	Steep Slope Mining	<u>NA</u>	
240	Auger Mining	<u>NA</u>	
250	In Situ Processing Activities	<u>NA</u>	

302-260	Coal Processing Plants <b>(Not Located Within Permit Area of Mine)</b>	<u>NA</u>	
270	Variations From Approximate Original Contour Restoration Requirements	<u>NA</u>	
280	Variations for Delay in Contemporaneous Reclamation Requirement in Combined Surface and Underground Coal Mining Activities	<u>NA</u>	
290	Small Operator Assistance Program <b>(SOAP)</b>	<u>NA</u>	

302-300	Special Areas of Mining	<u>NA</u>	
301	Prime Farmland	<u>NA</u>	
302	Alluvial Valley Floors	<u>NA</u>	