



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

November 13, 2014

Kerry Goodballet, Director of Permitting
CONSOL Mining Company, LLC
CNX Center
1000 CONSOL Energy Drive
Canonsburg, PA 15317

Subject: Midterm Completion Response, Task ID #4703, CONSOL Mining Company, LLC, Hidden Valley Mine, C/015/0007

Dear Ms. Goodballet:

The Division of Oil, Gas and Mining (the Division) has completed its review of the submitted responses to the deficiencies identified during the recently conducted Hidden Valley Mine midterm review. The Division has found that additional information is required.

The deficiencies are listed as an attachment to this letter. The author of each of the deficiencies is provided in order to facilitate communication between your staff and the Division's if necessary. The application is denied. Please resubmit the entire application by December 15, 2014.

If you have any questions, please feel free to contact Daron Haddock (801) 538-5325 or myself (801) 538-5350.

Sincerely

Steve Christensen
Permit Supervisor

SKC/ss

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Technical Analysis and Findings
Utah Coal Regulatory Program

PID: C0150007
TaskID: 4703
Mine Name: HIDDEN VALLEY MINE
Title: MIDTERM COMPLETION RESPONSE

Operation Plan

Hydrologic General

Deficiencies Details:

R645-301-760- The Permittee must provide a revision to the reclamation section of the MRP that discusses how the drill pads associated with monitoring wells HV-06-01, HV-06-02, HV-06-03 will be reclaimed. The initial midterm review (Task ID #4606) requested a discussion as to how the monitoring wells and their pads would be reclaimed. The Permittee discussed how the wells will be sealed and capped; however, upon review of the submitted information, it appears that a discussion as to how the pads will be reclaimed (i.e. natural drainage patterns established, re-vegetation efforts etc.) was not included.

schriste

Reclamation Plan

Contemporaneous Reclamation General

Deficiencies Details:

R645-301-121.200, Please correct the text on Chap III p. 8 in accordance with the following:
1) The permit area description in Sentence 2 on Ch III p. 8 is in error. The correct description is all of Sec 18 and the W1/2 sec 17 as shown on the accompanying map and on other Plates in the Hidden Valley MRP.
2) On Chap III p. 8, CONSOL has stated that the A-seam portals were reclaimed in 1997. This statement is in error. The B-seam portals were contemporaneously reclaimed in 1997. A commitment in the plan describes proceeding with reclamation of the A seam portals using techniques noted as successful on the B-seam area (MRP page 2-97B).

R645-301-244.100, The borehole reclamation plan should closely follow that provided in Amendment 97B which was successful. Amendment 97B describes the use of coarse fragments (rock) on the surface after grading and the use of surface roughening for erosion control. Please modify the borehole reclamation plan accordingly.

pburton

Bonding Determination of Amount

Deficiencies Details:

R645-301-830.140, -.110,-.410: The Permittee failed to provide supporting calculations for the estimates including line item

and unit cost from R.S. Means Heavy Construction Cost Data Manual, the Caterpillar Handbook, or other appropriate resources. Permittee failed to supply the requested revised/update line item bonding cost estimates for the final reclamation and plugging of the three monitoring wells HV-06-01, HV-06-02, and HV-06-03 installed in 2006 and 2007. This information was requested in the Midterm review Task # 4604.

R645-301-830.300 The bonding summary sheet provided used incorrect escalation rates resulting in errors of the bond amount.

Please provide revised detailed line item bonding costs with supporting calculations for the all the demolition, earthwork and revegetation estimates, including the final reclamation of the three monitoring wells installed in 2006 and 2007. The bonding summary sheet and corresponding bonding calculation sheet need to be updated and appropriately escalated to 2019 dollars using the Division's approved escalation rates.

cparker