

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

OK

March 26, 2008

TO: Internal File

THRU: James D. Smith, Permit Supervisor *DS 04/25/08*
Steve Christensen, Team Lead *SC*

FROM: Wayne H. Western, Environmental Scientist III *WHW*

RE: PHC Update (related to Task 2807, Task 2821, Task 2885), CONSOL Energy Company, Emery Deep Mine, C/015/0015, Task ID #2951

SUMMARY:

On October 3, 2007, the Permittee submitted updated hydrologic information to the Division. On October 12, 2007, the Permittee submitted additional information. The information was submitted per conditional approval granted the Permittee to employ full extraction techniques on the 14th West Panel in the Emery Deep Mine (Task ID #2807). In addition, the Permittee provided additional information in support of proposed full extraction mining in the 15th West, 4th East and 6th West panels.

TECHNICAL MEMO

TECHNICAL ANALYSIS:

OPERATION PLAN

MINING OPERATIONS AND FACILITIES

Regulatory Reference: 30 CFR 784.2, 784.11; R645-301-231, -301-526, -301-528.

Analysis:

The Permittee met the minimum requirements of this section. The Permittee proposed to update the mine plan to allow for full extraction mining in the 4th East, 6th West 14th West, and 15th West and Zero North panels. The Permittee proposed to use full extraction for maximum economic coal recovery. The Permittee proposed to mine the zero north panel in order to recover coal while they wait on a federal IBC lease.

Findings:

The information in the proposed amendment is considered adequate to meet the minimum requirements of this section.

EXISTING STRUCTURES:

Regulatory Reference: 30 CFR 784.12; R645-301-526.

Analysis:

The Permittee met the minimum requirements of this section. The Permittee will not be using any structure that was constructed prior to January 21, 1981 that has not already been used as part of the permit.

Findings:

The information in the proposed amendment is considered adequate to meet the minimum requirements of this section.

RELOCATION OR USE OF PUBLIC ROADS

Regulatory Reference: 30 CFR 784.18; R645-301-521, -301-526.

Analysis:

The Permittee met the minimum requirements of this section. The Permittee does not propose to relocate or use a public road as referred to as in R645-301-526. The Permittee proposed to subside areas that include Emery County roads. The Permittee and Emery County have reached an agreement for remediation of the roads in the event that subsidence damages the roads.

Findings:

The information in the proposed amendment is considered adequate to meet the minimum requirements of this section.

COAL RECOVERY

Regulatory Reference: 30 CFR 817.59; R645-301-522.

Analysis:

The Permittee met the minimum requirements of this section. The Permittee proposed to use full extraction methods in order to increase coal recovery. By using full extraction (pillar splitting) the Permittee will recover coal that otherwise would have been left unrecoverable.

Findings:

The information in the proposed amendment is considered adequate to meet the minimum requirements of this section.

SUBSIDENCE CONTROL PLAN

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

Analysis:

Renewable Resources Survey

The Permittee met the requirements of this section of the regulations. The Permittee conducted a presubsidence and determined that there were natural renewable resources, structures or State appropriated water rights in the subsidence zone.

TECHNICAL MEMO

Subsidence Control Plan

The Permittee meet the minimum requirements of this section. In Chapter V page 26 of the December 2007 submittal, the Permittee stated:

Subsequent updated pre-subsidence surveys will be completed for all future panels where full extraction (planned subsidence) is contemplated. The reports will be submitted to DOGM six months prior to initiating full extraction.

The Permittee notified landowners and water conservancy districts at least six months before subsidence is scheduled to occur.

Findings:

The information provided in the proposed amendment is not considered adequate to meet the requirements of this section.

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:**Mine Workings Maps**

The Permittee met the minimum requirements of this section. Plate V-5 shows the areas were they intent to conduction mining.

Findings:

The information in the proposed amendment is considered adequate to meet the minimum requirements of this section.

RECLAMATION PLAN**GENERAL REQUIREMENTS**

Regulatory Reference: PL 95-87 Sec. 515 and 516; 30 CFR Sec. 784.13, 784.14, 784.15, 784.16, 784.17, 784.18, 784.19, 784.20, 784.21, 784.22, 784.23, 784.24, 784.25, 784.26; R645-301-231, -301-233, -301-322, -301-323, -301-331, -301-333, -301-341, -301-342, -301-411, -301-412, -301-422, -301-512, -301-513, -301-521, -301-522, -301-525, -301-526, -301-527, -301-528, -301-529, -301-531, -301-533, -301-534, -301-536, -301-537, -301-542, -301-623, -301-624, -301-625, -301-

Page 5
C/015/0015
Task ID #2951
March 26, 2008

TECHNICAL MEMO

626, -301-631, -301-632, -301-731, -301-723, -301-724, -301-725, -301-726, -301-728, -301-729, -301-731, -301-732, -301-733, -301-746, -301-764, -301-830.

Analysis:

The Permittee met the general reclamation requirements. Since the amendment for full extraction does not involve any new surface facilities no additional reclamation work is needed.

Findings:

The information in the proposed amendment is considered adequate to meet the minimum requirements of this section.

RECOMMENDATIONS:

The Division should approve the amendment.

O:\015015.EME\FINAL\WG2951\whw2951.doc