

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

November 12, 2008

TO: Internal File

THRU: Jim Smith, Permit Supervisor *DS 11/12/08*

FROM: Steve Christensen, Environmental Scientist *SKC*

RE: Lump Coal Pad and Gate, Consolidation Coal Company, Emery Deep Mine, C/015/0015 , Task ID #3065

SUMMARY:

On October 1st, 2008 the Division of Oil, Gas and Mining (the Division) received an amendment to the Emery Deep Mining and Reclamation Plan from Consolidation Coal Company (the Permittee). The amendment calls for the construction of a concrete pad under the 4th East Portal hopper. The concrete pad will facilitate the sale of lump coal to the general public. The area of the proposed concrete pad is located under and adjacent to an existing structure within a previously disturbed area. As the proposed amendment is a minor revision to the Mining and Reclamation Plan, it is not necessary to update the Master TA at this time.

The amendment should be approved at this time.

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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 amendment meets the Mining Operations and Facilities requirements of the State of Utah R645-Coal Mining Rules. Plate II-3, 4 East Portal Surface Facilities has been updated to reflect the addition of the lump coal pad (See Item 16A on Plate II-3).

In addition, the Permittee has amended the surface facilities description for the 4th East Portal facility in Chapter II of the approved MRP on page 17F.

Findings

The amendment meets the Mining Operations and Facilities requirements of the State of Utah R645-Coal Mining Rules.

RECLAMATION PLAN

BONDING AND INSURANCE REQUIREMENTS

Regulatory Reference: 30 CFR Sec. 800; R645-301-800, et seq.

Analysis:

General

The amendment meets the Bonding and Insurance Requirements of the State of Utah R645-Coal Mining Rules.

The Permittee has updated the bonding information (See Chapter IV of the approved MRP) to reflect the additional reclamation costs associated with the construction of the concrete pads and their associated reclamation costs.

The bond summary provided in Chapter IV Page 12 and the demolition cost summary pages have been updated to reflect the additional reclamation costs associated with the proposed concrete pads.

Findings:

The amendment meets the Bonding and Insurance Requirements of the State of Utah R645-Coal Mining Rules.

RECOMMENDATIONS:

The amendment should be approved at this time.