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TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

December 23, 2011

TO: Internal File

THRU: Steve Christensen, Permit Supervisor SKC

FROM: James Owen, Engineer JO

RE: Subsidence Monitoring Revision, Consolidation Coal Company, Emery Deep Mine, C/015/0015, Task #3986

SUMMARY:

On April 22, 2011, the Division of Oil Gas & Mining received Consolidation Coal Company's 2010 annual report for the Emery Deep Mine.

After the initial review of the report, it was determined that a more in-depth review was required for the subsidence-related commitments that are reported within the annual report. The commitments are found in the mine's MRP (Mining and Reclamation Plan). The review identified two subsidence commitments that needed to be revised.

On December 6, 2011, The Division received an application for an amendment to the applicant's MRP to address the required revisions identified during the annual report review. This memo addresses compliance with the engineering (R645-301-500) section of the Utah Coal Mining Rules.

TECHNICAL MEMO

TECHNICAL ANALYSIS:

OPERATION PLAN

SUBSIDENCE CONTROL PLAN

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

Analysis:

The two commitments that needed to be adjusted or were identified as follows:

Title: *Subsidence Monitoring*

Objective: *The Permittee will provide 3 copies of a subsidence monitoring report to DOGM within one month after completion of any subsidence monitoring field survey conducted pursuant to the approved subsidence control plan. Subsidence monitoring reports shall contain*

1) Mine maps showing where pillars have been pulled and the month and year that such pillars were removed or partially removed, 2) Maps showing the location of survey monitoring stations and tension cracks and/or compression feature visible on the surface, 2a) The subsidence monitoring points above the areas outlined on Plate V-5 as full extraction areas will have photographs taken to record pre and post subsidence, 3) The differential level and horizontal survey summary, 4) A narrative.

Frequency: *As needed. Permittee will submit report one month after completion of field survey.*

Status: *On going.*

Reports: *Track in Annual report to ensure compliance. Re-submittal of reports is not necessary if operator has already done so. Division Engineer will review subsidence reports here to ensure compliance for the year.*

Citation: *Chapter V 1 of 3 Chapter V page 37.*

Review: This commitment should remain in the MRP but should be adjusted. The Division will not require 3 copies of the subsidence report and it will not need to be submitted within one month after completion of the field survey. Subsidence reports can be included in the annual report.

Title: *Subsidence Monitoring*

Objective: *The Permittee will provide the Division with a quarterly subsidence mitigation report that describes the surface mitigation projects and their status broken down by surface land owners.*

Frequency: *quarterly*

Status: *On going*

Reports: *Track in Annual report to ensure compliance. Re-submittal of reports is not necessary if operator has already done so. Division Engineer will review subsidence reports here to ensure compliance for the year.*

Citation: *Chapter V 1 of 3 Chapter V page 37*

Review: This commitment does not need to remain in the MRP and should not need to be included in annual report. It is recommended that this commitment be removed from the MRP.

The submitted application included changes to Chapter V Page 37 of the MRP. The changes included adequately addressed the revision requirements.

Findings:

Contents and information provided are sufficient enough to meet the minimum requirements of this section of the Utah Coal Mining Rules.

RECOMMENDATIONS:

The amendment is recommended for approval at this time.