

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

JK

August 20, 2007

TO: Internal File

THRU: Pamela Grubaugh-Littig, Permit Supervisor *PL*
Karl R. Houskeeper, Lead

FROM: Karl R. Houskeeper, Environmental Scientist III *KRH by an*

RE: Amendment – Replace Construction Maps with As-Built Maps, Energy West Mining Company, Deer Creek Mine, C/0150018, Task #2820

SUMMARY:

The Division received a letter dated June 25, 2007 requesting that various construction maps be replaced with as-built maps in Volume 10, Deer Creek Waste Rock Site. The new maps are all cad maps and have been generated by utilization of aerial photogrammetry.

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TECHNICAL ANALYSIS:

OPERATION PLAN

ROAD SYSTEMS AND OTHER TRANSPORTATION FACILITIES

Regulatory Reference: 30 CFR Sec. 784.24, 817.150, 817.151; R645-301-521, -301-527, -301-534, -301-732.

Analysis:

Plans and Drawings

Plate 4-1, map DS-1011-E, from the original Mining and Reclamation Plan (MRP) is now been made into two maps with the same designation, Plate 4-1 map DS-1011-E. Since the map now has been split there is a 1 of 2, and 2 of 2. The information on these maps shows the cross sections of the access road into the waste rock site. This access road is classified as a primary road. The original drawing in the MRP depicts a diversion along the right side of the access road. The new drawing does not depict this diversion. A field inspection revealed that there is a diversion along the right side of the access road. Further investigation into the MRP reveals that it does not contain designs for this diversion.

The MRP needs to be modified to include designed diversions along the access road. The cross sections of the access road need to reflect the designed diversion location and depth on Plate 4-1, 1 of 2 and 2 of 2.

All other maps submitted and reviewed have been found acceptable.

Findings:

R645-301-527.200 Plate 4-1, 1 of 2 and 2 of 2 needs to be revised to show the diversion on the right side of the primary access road into the waste rock site. This diversion needs to be designed to protect the primary road.

RECOMMENDATIONS:

This amendment Task # 2820 should be denied until the deficiencies listed above relative to the road diversion design and cross sections have been properly addressed.