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State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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March 19, 2002

Wendell Owen, Mine Manager
Co-Op Mining Company
P. O. Box 1245
Huntington, Utah 84528

Re: Blind Canyon Seam Portal, Co-Op Mining Company, Bear Canyon Mine, C/015/025-AM02A, Outgoing File

Dear Mr. Owens:

The above-referenced amendment has been reviewed. There is one deficiency that must be adequately addressed prior to approval. A copy of our Technical Analysis is enclosed for your information. In order for us to continue to process your application, please respond to these deficiencies by April 22, 2002.

If you have any questions, please call me at (801) 538-5325 or Wayne at (801) 538-5263.

Sincerely,

Daron R. Haddock

Daron R. Haddock
Permit Supervisor

db/an
Enclosure
cc: Price Field Office
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State of Utah

Utah Oil Gas and Mining

Coal Regulatory Program

Bear Canyon Mine
Blind Canyon
C/015/025-AM02A
Technical Analysis
March 21, 2002

TECHNICAL ANALYSIS

INTRODUCTION

On January 11, 2002, the Division received amendment AM02A, for the addition of a forth portal at the Wild Horse Ridge facility in the Blind Canyon seam. The major changes to the MRP are the addition/reclamation of the forth portal and the increase in the reclamation cost estimate.

INTRODUCTION

ENVIRONMENTAL RESOURCE INFORMATION

Regulatory Reference: Pub. L 95-87 Sections 507(b), 508(a), and 516(b); 30 CFR 783., et. al.

MAPS, PLANS, AND CROSS SECTIONS OF RESOURCE INFORMATION

Regulatory Reference: 30 CFR 783.24, 783.25; R645-301-323, -301-411, -301-521, -301-622, -301-722, -301-731.

Analysis:

Affected Area Boundary Maps

The Division usually considers the affected area to be the same as the permitted area. The Permittee does not propose to change either the affected area of the permitted area. Therefore, the Permittee does not have to change any of the pre-mining permit area maps.

Permit Area Boundary Maps

The Permittee will not change the permitted boundaries for the addition of the forth portal at the Wild Horse Ridge site.

Findings:

The Permittee met the minimum requirements of this section of the regulations.

OPERATION PLAN

MINING OPERATIONS AND FACILITIES

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

Analysis:

General

The Permittee proposes to add a forth portal to the Blind Canyon seam at the Wild Horse Ridge site. The new portal will be located in the same area as the three approved portals. The only change to the disturbed area is a slight increase to the highwall area.

Findings:

The Permittee met the minimum requirements of the regulations.

SUPPORT FACILITIES AND UTILITY INSTALLATIONS

Regulatory Reference: 30 CFR Sec. 784.30, 817.180, 817.181; R645-301-526.

Analysis:

The Permittee proposes to add a forth portal at the Wild Horse Ridge site in the Blind Canyon seam. The portal will be located next to the approved portals. See Plate 2-4G for details.

Findings:

The Permittee met the minimum requirements for 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:

Affected area maps

The affected area is usually considered the same as the permitted area. The Permittee will not change the permit area in connection with the additional portal.

Mining facilities maps

Plate 2-4G shows the surface facilities for the Wild Horse Ridge site. The revised map shows the location of the four portals and the highwall boundary.

Mine workings maps

Plate 3-4A shows the location of the four portals that will be used to access the Blind Canyon Seam. The Permittee does not propose to change

Findings:

The Permittee met the minimum requirements of this section of the regulations.

RECLAMATION PLAN

APPROXIMATE ORIGINAL CONTOUR RESTORATION

Regulatory Reference: 30 CFR Sec. 784.15, 785.16, 817.102, 817.107, 817.133; R645-301-234, -301-270, -301-271, -301-412, -301-413, -301-512, -301-531, -301-533, -301-553, -301-536, -301-542, -301-731, -301-732, -301-733, -301-764.

Analysis:

The Permittee proposes to add an additional portal to the Wild Horse Ridge site. The addition portal will require a small increase in the highwall area. The increased size will be between 15' to 20' in length. The Permittee did not include any cross sections for the new portal or the increased highwall area. However, do to the limited size the Division believes that the addition highwall area can be reclaimed. The Division will require the Permittee to supply cross sections for all portals so that assumption can be verified.

The Division reviewed the reclamation plan and determined that the Permittee would be able to restore the site to the approximate original contours. The additional portal will only increase the highwall area by 15' to 20'. Therefore, the Permittee should be able to reclaim the site to AOC standards.

Findings:

The Permittee met the minimum requirements of this section of the regulations.

BACKFILLING AND GRADING

Regulatory Reference: 30 CFR Sec. 785.15, 817.102, 817.107; R645-301-234, -301-537, -301-552, -301-553, -302-230, -302-231, -302-232, -302-233.

Analysis:

General

The backfilling and grading requirements for the area have been covered in the AOC section. The area is small and will be backfilled and graded to the standards in the approved MRP.

Findings:

The Permittee met the minimum requirements of this section of the regulations.

MAPS, PLANS, AND CROSS SECTIONS OF RECLAMATION OPERATIONS

Regulatory Reference: 30 CFR Sec. 784.23; R645-301-323, -301-512, -301-521, -301-542, -301-632, -301-731.

Analysis:

Bonded area map

The bonded area is usually the same as the disturbed area boundary map. The Permittee does not plan to change the disturbed area boundaries. The disturbed area boundary map that shows the final topography is Plate 3-2G, which did not change.

Reclamation backfilling and grading maps

The backfilling and grading map Plate 3-2G did not change. While the addition of the forth portal will create only a minor disturbance the event will require that the Permittee provide additional information about how the site will be restored to AOC.

Portal face up areas are considered highwalls by the Division. In order to achieve AOC the Permittee must demonstrate that all highwalls will be eliminated. That demostration usually requires that the Permittee show the premining, operational and postmining topography in cross sections. Since the Permittee is adding a new portal and changing the location of an approved portal the cross section in the MRP that were used to support a finding of AOC are no longer valid. Therefore, the Permittee will have to supply the Division with additional cross sections.

Findings:

Information provided in the proposed amendment is not considered adequate to meet the requirements of this section. Before approval, the Permittee must provide the following in accordance with:

R645-301-542.200 and R645-301-553.120, The Permittee must give the Division cross sections that show the premining, operational and postmining controls for the forth portal at the Wild Horse Ridge site and for all portals whose location has been changed. The Division needs this information to verify that the site will be restored to AOC standards.

BONDING AND INSURANCE REQUIREMENTS

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

Analysis:

Determination of bond amount

The Permittee did not include any additional earthwork costs for reclaiming the highwall area. The Division has reviewed the backfilling and grading maps and determined that the increased earthwork would be minor, less than 5% of the total earthwork cost. Therefore, the Division will not require and additional earthwork calculations. Note: in general most earthwork calculations generally only come within 10% of each other.

The Division will include the portal closure cost for the forth portal. Note: The Division has recently changed the unit cost for portal closure from $12,500 per portal to $5,000 per portal. Therefore, the reclamation cost for the site should decrease.

Findings:

The Permittee met the minimum requirements for this section of the regulations.