

CO-OP MINING COMPANY

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December 29, 2004

Coal Program
Utah Division of Oil, Gas & Mining
1594 West North Temple, Suite 1210
P.O. Box 145801
Salt Lake City, Utah 84114-5801

Incoming
1/015/0025

To Whom It May Concern,

Re: Application to Change Existing Mining Plan, Reformat and Digitization, Bear Canyon Mine, ACT/015/0025-Task ID #1989.

Enclosed are four digital copies and one hard copy of our response to the Technical Analysis dated September 1, 2004. Links have been provided as blue text to aid in the review process. Chapter 3 in both the electronic version and the hard copy has been scaled down and does not fit the entire page. This mistake was noticed after links had been set up in the electronic version. Since the contents of the page are exactly as they will be, just shrunk down, we left both the hard copy and electronic copies like this for the review. This mistake will be corrected with the clean copies.

We have included all parts of the MRP with the electronic copy so the reviewer can follow links between chapters if they want. Some links in chapters that have not been changed may not work. This will be corrected when clean copies are submitted. In this submittal we have not set up an index that allows you to search the entire eMRP for specific words. This index will be set up once the amendment is approved.

If you have any questions, please call me at (435) 687-5238.

Thank You,

Mark Reynolds

Mark Reynolds

Enclosure(s)

File in:
C:\015\0025\0004\Incoming
Refer to:
 Confidential
 Shelf
 Expandable
Date: *123004* for additional information

RECEIVED
DEC 30 2004
DIV. OF OIL, GAS & MINING

APPLICATION FOR COAL PERMIT PROCESSING

Permit Change New Permit Renewal Exploration Bond Release Transfer

Permittee: CO-OP MINING COMPANY

Mine: BEAR CANYON MINE

Permit Number: ACT/015/025

Title: MRP Reformat Task ID #1989

Description, Include reason for application and timing required to implement:

Instructions: If you answer yes to any of the first eight (gray) questions, this application may require Public Notice publication.

- Yes No 1. Change in the size of the Permit Area? Acres: _____ Disturbed Area: _____ increase decrease.
- Yes No 2. Is the application submitted as a result of a Division Order? DO# _____
- Yes No 3. Does the application include operations outside a previously identified Cumulative Hydrologic Impact Area?
- Yes No 4. Does the application include operations in hydrologic basins other than as currently approved?
- Yes No 5. Does the application result from cancellation, reduction or increase of insurance or reclamation bond?
- Yes No 6. Does the application require or include public notice publication?
- Yes No 7. Does the application require or include ownership, control, right-of-entry, or compliance information?
- Yes No 8. Is proposed activity within 100 feet of a public road or cemetery or 300 feet of an occupied dwelling?
- Yes No 9. Is the application submitted as a result of a Violation? NOV # _____
- Yes No 10. Is the application submitted as a result of other laws or regulations or policies?

Explain: _____

- Yes No 11. Does the application affect the surface landowner or change the post mining land use?
- Yes No 12. Does the application require or include underground design or mine sequence and timing? (Modification of R2P2)
- Yes No 13. Does the application require or include collection and reporting of any baseline information?
- Yes No 14. Could the application have any effect on wildlife or vegetation outside the current disturbed area?
- Yes No 15. Does the application require or include soil removal, storage or placement?
- Yes No 16. Does the application require or include vegetation monitoring, removal or revegetation activities?
- Yes No 17. Does the application require or include construction, modification, or removal of surface facilities?
- Yes No 18. Does the application require or include water monitoring, sediment or drainage control measures?
- Yes No 19. Does the application require or include certified designs, maps or calculation?
- Yes No 20. Does the application require or include subsidence control or monitoring?
- Yes No 21. Have reclamation costs for bonding been provided?
- Yes No 22. Does the application involve a perennial stream, a stream buffer zone or discharges to a stream?
- Yes No 23. Does the application affect permits issued by other agencies or permits issued to other entities?

Please attach four (4) review copies of the application. If the mine is on or adjacent to Forest Service land please submit five (5) copies, thank you. (These numbers include a copy for the Price Field Office)

I hereby certify that I am a responsible official of the applicant and that the information contained in this application is true and correct to the best of my information and belief in all respects with the laws of Utah in reference to commitments, undertakings, and obligations, herein.

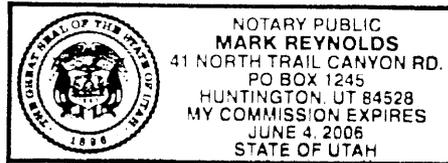
Charles Reynolds
Print Name

Charles Reynolds, Mine Inspector
Sign Name, Position, Date

Subscribed and sworn to before me this 29 day of December, 2004

Mark Repp
Notary Public

My commission Expires: _____ } ss:
Attest: State of Utah }
County of Emery



<p>For Office Use Only:</p>	<p>Assigned Tracking Number:</p>	<p>Received by Oil, Gas & Mining</p> <p style="text-align: center; font-size: 1.2em;">RECEIVED</p> <p style="text-align: center; font-size: 1.2em;">DEC 30 2004</p> <p style="text-align: center; font-size: 0.8em;">DIV. OF OIL, GAS & MINING</p>
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Response to AM02I Technical Analysis Dated September 1, 2004

This document outlines the responses to the summary of outstanding deficiencies contained in the Technical Analysis dated September 1, 2004. The responses to the deficiencies are identified by the regulatory reference contained in the TA document. This response is designed to assist the reviewer in identifying the revisions that have been made to address the deficiencies.

R645-301-121 The CHIA has been included in Appendix 7-L.

R645-301-121 The following corrections have been made in Appendix 7-N-F.
The contents of pages F-35 and F-37 were switched.
The contents of page F-104 was moved to F-106 and the contents of F-105 and F-106 were moved to F-104 and F-105 respectively.
The contents of pages F-127 and F-129 were switched.

R645-301-121 The following corrections have been made.
The previous table 3-4 was the same as the previous table 3-8 and was removed. All Subsequent tables were renumbered (pgs. 3-v, 3-47, 3-49, 3-50, 3-51) and chapter 3 was re-paginated (pgs. 3-ii, 3-iii, and 3-37 to end). The text referring to the old table 3-4 was changed to refer to table 3-7 (pg. 3-35). All references to tables 3-5 thru 3-8 were changed (pgs. 3-46, 3-48, and 3-62).
Replaced the misused word rations. (pgs. 3-v, and 3-51)
Changed references from Appendix 9-H to an Appendix in Chapter 3. (pg. 3-13)
Changed the reference from Table 3-7 to Table 3-4 (pg. 3-46).
An inaccurate reference to section 7.3 on page 7-134 was fixed to reference R645-301-760

R645-301-121.200 The following corrections have been made.
The channel cross sections for RC-1 through RC-12 have been included on pages 7H-48 through 7H-51.
The references to Appendix 7-H have been updated to match the new pagination. (page 7-140).

R645-301-121.200 The permittee feels that the current Appendix 7-C is adequate. Since all interested parties have access to the internet and because of the fact that provisions of the waters rights within or around the permit area can change with the permittee having no knowledge of it, we feel that the best way to provide current up to date water rights information is to reference the Water Rights Webpage. The permittee feels that at all times the Water Rights webpage will be more accurate and current then our MRP since it is a living database and is updated often without having to go through the steps and reviews that it would take to update our MRP. The link is now an active link to the website.

R645-301-122, 624-130 Removed blank pages from chapter six and included references on page 6-22. Because of the removal of pages chapter 6 was re-paginated. This required us to make the following changes.
Updated pages 6-ii, 6-iii, and 6-iv to match new page numbers. There was no text in the rest of the MRP referring to chapter 6 pages.

R645-301-140-142 The permittee is confused by this statement. On page 6 of the TA it sites regulation R645-301-140 and 142 (Maps and Plans) as deficiencies and refers me to page 18 where the findings state that the requirements of this section has been meet. However on page 19 of the TA it sites regulation R645-301-150 (completeness) and states that we have not met the requirements of R645-301-120 (application format and content).

This confuses the permittee since the purpose of this amendment is to change to the format preferred by the Division. Also since we have responded to all deficiencies to every other regulation it seems that the requirements of content have been meet. If the Division feels that the application is deficient under 120 we ask that they let us know what format they want the application in, or what content they want added.

R645-301-528.230, R645-301-356, and R645-301-542.730, The statements on page 5-40 placing the burden of proof on the Division was removed.

The following changes were also made to incorporate the approved Abandoned Equipment Amendment (Task ID #1934) into this one. Text was added to pages 7-v, 7-46, 7-47, 7-53, and 7-54. The old Appendix 7-P Abandoned Equipment was added as Appendix 7-Q. The location of the cap and powder magazines were changed on plates 5-1C and F. There was changes to additional pages and maps associated with the Abandoned equipment (old Plate 7-10B, and old Appendix 2-A) that were not incorporated because those pages and maps are being modified in amendments currently under review such as the Lead Monitoring Amendment.