

Response to Technical Analysis dated November 4, 2005

R645-301-515.311; All requirements of this regulation will be met. Appendix 3Q has been added and includes detailed descriptions of how we will meet this regulation.

R645-301-529.100; All requirements of this regulation will be met. Appendix 3Q has been added and includes detailed descriptions of how we will meet this regulation. MSHA has already approved plans showing this portal. This shows that they feel that we have met all the requirements of 30 CFR. It should also be noted that 30 CFR Part 75.380 does not apply to this portal since it is neither the primary nor the secondary escapeway. MSHA required two escapeways which we currently have. However both MSHA and C. W. Mining encourage any additional portals in the event of an unforeseen mine disaster that could block both MSHA required escapeways. Because it is unlikely that such a disaster would occur MSHA does not consider any additional portals beyond the two required as escapeways, and thus does not require a travel way to the portal.

This portal is similar to the Blind Canyon Portal. If you read Appendix 3-I you will see that it describes the portal as only having foot access from the outside and that it could, in the unlikely event that it is needed, be used to evacuate the men.

R645-301-551, R645-301-542.700; Detailed descriptions that meet these requirements can be found in Appendix 3Q.

R645-301-512.100; All plates showing the disturbed boundary in this area have been updated and included. These plates also show surface contours. Several of the plates are Plate 7-5A, Plate 7-7A, and Plate 8-1A. As explained in Appendix 3Q this portal will have no impact on the surface contours or the surface watershed.

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3.3.2 Portals

Bear Canyon Mine complex has ~~thirteen~~ **seven** existing portals, and ~~seven~~ **one** proposed portals.

The Blind Canyon Seam (Plate 3-4A) has two fan, one belt, and two intake portals. The first fan portal is in Bear canyon near the upper storage pad and the second is in Blind Canyon. The belt portal pad is shown on Plate 3-6. One intake portal is located in the main portal area, and one in Blind Canyon (Appendix 3-I). Three accidental breakouts also exist in Blind Canyon, making a total of 5 openings in the Blind Canyon Seam on the Blind Canyon side. ~~These will be~~ **Four of these have been reclaimed in the same manner described in as the other portals (Appendix 3-I). The remaining two have been permanently sealed and will be backfilled during final reclamation.** There are two portals in the Hiawatha Seam (Plate 3-4B): a belt and an intake portal. **Permanent Seals have been placed over these portals backfilling will take place during final reclamation. Mining from this Hiawatha seam is not anticipated until 2007. Until that time, these two portals will be temporarily sealed using a block seal as described in Section 3.6.10.1.**

The Bear Canyon #2 Mine, has three portals (Plate 3-4C), **that have been reclaimed all located in Bear Canyon.**

The Bear Canyon #3 and #4 mines, proposed for Wild Horse Ridge, will have a total of ~~seven~~ **six** portals (Plate 3-4A and 3-4C), all located in Bear Canyon. ~~The actual location of the #4 Mine portals will not be known until development begins in the #3 Mine and underground drilling can be accomplished, since the Tank Seam does not outcrop to indicate the best access location. No mining will occur in the Tank Seam until an amendment is submitted to the Division to permit surface access. The reserve and permit information has been included for the requirements of the Resource Recovery and Protection Plan.~~ **The #4 Mine has an auxiliary portal described in Appendix 3Q**

A summary of the portals are as follows:

		<u>Existing</u>	<u>Proposed</u>
Blind Canyon Seam	- Bear Canyon	3	4
	- Blind Canyon	5	
Hiawatha Seam	-	2	
Tank Seam	-	<u>3</u>	<u>1</u>
	TOTAL	13 8	7 1

Appendix 3-Q

#4 MINE AUXILIARY PORTAL

#4 Mine Auxiliary Portal

This portal is located in the left fork of the right fork of Bear Canyon. It will primarily be used for water monitoring access to seeps and springs located in the area that are normally inaccessible during winter months. If needed in the future this portal could also be used for intake ventilation to facilitate adequate ventilation across the working faces. Although this is not one of the MSHA required escapeways, in the extremely unlikely event that miners are unable to use either the primary or secondary escapeway, they could be evacuated through this portal. Although C. W. Mining does not anticipate this occurring if it did miners would be transported from the portal opening by helicopter. Access to this portal from the outside is similar to access to the Blind Canyon Portal described in Appendix 3-I and this portal is also strongly supported by C. W. Mining safety personnel as well as M.S.H.A.

Construction

The construction and reclamation of this portal will be similar to the Blind Canyon portal just the the uses are similar. The portal will extend to a coal outcrop that is covered by soil ranging from 0 to 3 inches in depth. The portals will be 6 to 8 feet tall, 9 to 18 feet wide and will be supported by roof bolts which extend into the sandstone rock above the coal Where necessary additional support will be used and may include matting, screens, cribs, timber, and metal canopies. The portal will be closed with a stopping which will prevent unauthorized access of people as well as large animals which could theoretically utilize the portal for denning. A "No Trespassing" sign will also be posted outside the portal.

The topsoil will be removed from the area by hand and placed in a pile next to the anticipated opening. It will then be transported to a dry location underground once the portal is established. Surface disturbance will be minimal due to the nature of a continuous mining machine pulling the material into the mine. Any soil material that is pulled into the mine will be placed in a dry area inside the mine and will be stored for reclamation. Any coal or waste material which might crumble and fall down the slope will be retrieved by hand to whatever degree is reasonable.

The drainage from above the portal is minimal due to the size of the impacted area and the fact that the portal opening will be on a natural crest causing the water to flow away from the portal. In the event that any water does flow down in to the portal a berm will be constructed by hand above the portal opening to facility the flow of water around the portal opening.

Reclamation

Reclamation will be accomplished from within the mine similar to the Blind Canyon Portal. The topsoil material being stored in mine will be placed outside next to the portal opening. Fill material will then be hauled through the mine and backed filled to a depth of 25 feet using underground equipment such as skid loaders and scoops. A permanent cement seal will then be built in the portal. The topsoil will be spread with underground equipment as much as possible before the hole is completely sealed. After the portal is sealed the remaining topsoil work will be done by hand. For revegetation seeds and erosion control matting will be hauled in by hand and placed over the disturbed area.