



State of Utah

Department of Natural Resources

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Division of Oil, Gas & Mining

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Lieutenant Governor

July 27, 2005

Charles Reynolds, General Manager
Co-Op Mining Company
P.O. Box 1245
Huntington, Utah 84528

Subject: #3 Mine Escarpment Failure, Co-Op Mining Company, Bear Canyon Mine, Permit C/015/0025, Task ID #2268, Outgoing File

Dear Mr. Reynolds:

The submittal, a revision of the MRP that extends the area of projected subsidence for the Blind Canyon Seam in the Bear Canyon Mine, was received on June 2, 2005. It has been reviewed under Task #2268.

Before the Division can approve this amendment, the Permittee must provide the information outlined in the attached deficiencies, in accordance with the R645 Coal Mining Rules cited. For clarification or more information, you can contact the Division specialist whose initials are at the end of each deficiency.

WHW Wayne Western 801-538-5263

In order for us to continue to process your application, please respond to these deficiencies by August 30, 2005.

If you have any questions, please call me at (801) 538-5268 or Wayne Western at (801) 538-5263.

Sincerely,

Pamela Grubaugh-Littig
Permit Supervisor

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TECHNICAL DEFICIENCIES

R645-301-121.200, The Permittee must clarify the statements on page 1-4 Barrier Pillars of the submittal. The first sentence the Permittee states that barrier pillars will be left where required and in the first sentence the Permittee states that they will not mine closer than 200 feet from an outcrop. The Permittee must clarify what is meant by the term where required. The Division needs to know what areas will have barrier pillars and what areas will not. The Permittee states that barrier pillars will be left where required and later states that they will use barrier pillars at all coal outcrops. The Permittee must clarify whether or not they will leave barrier pillars around all coal outcrops and if so what is the minimum width. [WHW]

R645-301-525.420, The Permittee must show on Plate 3-4A the location of all barrier pillars and list their widths. [WHW]

R645-301-525.490, The Permittee must state how the public and the environment will be protected if • 200 foot barrier pillars are no longer required along escarpments in the fee areas and • 200 foot barrier pillars are no longer needed along coal outcrops. [WHW]

R645-301-525.420, The Permittee must show on Plate 3-4A the following: • On Plate 3-4A, the Permittee projects the mine workings outside the permit boundary. That occurs in Section 13. • On Plate 3-4A, the Permittee projects the mine workings outside of the coal outcrop line. That occurs in Section 25. • The Permittee projects full extraction mining outside of the potential subsidence zone. That occurs in Section 19 and Section 20. The Permittee show that full extraction will only occur in areas approved for that type of mining. [WHW]