



State of Utah

Department of Natural Resources

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Division of Oil, Gas & Mining

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August 17, 2005

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

Subject: Escarpment Failure, Co-Op Mining Company, Bear Canyon Mine, C/015/0025, Task ID #2173, Outgoing File

Dear Mr. Reynolds:

The submittal, a revision of the MRP that extends the area of projected subsidence for the #4 Mine, was received March 3, 2005. It has been reviewed under Task #2173. Task # 2268, received June 2, 2005, extends the area of projected subsidence for the #3 Mine and is very similar, similar enough that it was initially thought to merely be a resubmittal of the same proposal. A letter to the Permittee, dated July 27, 2005, listed the deficiencies for Task # 2268: those deficiencies are basically the same as those for Task # 2173 and the Permittee's response to Task # 2268 may also address the deficiencies of Task # 2173.

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.

JDS	Jim Smith	(801) 538-5262
WHW	Wayne Western	(801) 538-5263

Draft Technical Memos and a draft TA have been prepared, but final versions of these documents will not be prepared until all technical deficiencies have been resolved. In order for us to continue to process your application, please respond to these deficiencies by September 16, 2005.

If you have any questions, please call me at (801) 538-5286 or Jim Smith at (801) 538-5262.

Sincerely,

D. Wayne Hedberg
Permit Supervisor

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TECHNICAL DEFICIENCIES

R645-301-121.200, -525, ● The Permittee needs to clarify and consistently represent the location and extent of the proposed mine workings, potential subsidence zone or zones, and the coal outcrop on Plates 3-3, 3-4A, and 3-4C. ● The Permittee needs to clarify whether the plan is to pull or leave pillars under the escarpment on the east side of Bear Canyon in Section 24. [JDS]

R645-301-121.200, The Permittee must clarify the statements on page 1-4 Barrier Pillars of the submittal. In the first sentence, the Permittee states that barrier pillars will be left where required. Also 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]

R645-301-521.141, The Permittee must update Plate 3-4a to show the changes to the mine plan and subsidence areas. [WHW]