

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

July 9, 2007

OK

TO: Internal File

THRU: Pamela Grubaugh-Littig, Permit Supervisor *pgl*
Jim Smith, Team Lead *DS 09/04/07*

FROM: Wayne H. Western, Environmental Scientist III, Bonding *W HW*

RE: Loadout Expansion, Task ID # 2809, CO-OP Mining Company, Bear Canyon Mines, C/015/0025

SUMMARY:

The Permittee submitted an application to the Division on March 27, 2006 to expand the loadout area at the Bear Canyon operation. The purpose of this expansion is to build a truck loading area that will allow the Permittee to load two trucks simultaneously.

The Permittee submitted additional information on May 15, 2007 to address deficiencies that were found during the first review.

TECHNICAL ANALYSIS:

ENVIRONMENTAL RESOURCE INFORMATION

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

PERMIT AREA

Regulatory Requirements: 30 CFR 783.12; R645-301-521.

Analysis:

The Permittee met the requirements of this section. The Permittee stated on the C1 form that no new permit or disturbed areas would be added in connection with this amendment.

Findings:

The information in the amendment is considered adequate to meet the requirements of this section.

OPERATION PLAN

MINING OPERATIONS AND FACILITIES

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

Analysis:

The Permittee met the requirements of this section. The Permittee expanded the truck loadout so that they could accommodate more trucks. The expansion was in anticipation of longwall operations that increased production.

Findings:

The information in the amendment is considered adequate to meet the requirements of this section.

AIR POLLUTION CONTROL PLAN

Regulatory Reference: 30 CFR 784.26, 817.95; R645-301-244, -301-420.

Analysis:

The Permittee meet the air pollution control requirements. They have permits from the Division of Air Quality as needed. The modifications to the loadout will not require any changes to the air quality permits.

Findings:

The information in the amendment is considered adequate to meet the requirements of this section.

ROAD SYSTEMS AND OTHER TRANSPORTATION FACILITIES

Regulatory Reference: 30 CFR Sec. 784.24, 817.150, 817.151; R645-301-521, -301-527, -301-534, -301-732.

Analysis:

TECHNICAL MEMO

Road Classification System

The Permittee met the requirements of this section by continuing to classify the Bear Canyon Haul Road as a primary road.

Plans and Drawings

The Permittee did meet the general requirements of the regulations outlined in this section. The requirements are:

- The Permittee did include maps and cross sections of the proposed roads. Map 5-2C shows the surface facilities including the loadout expansion. The cross sections show:
 - The asphalt surface of the Bear Canyon Haul Road
 - The concrete loading pads on the Bear Canyon Haul Road.

The Permittee did not meet the specific requirements for a primary road. Those requirements are:

- The cross sections must be certified by a registered professional engineer.
- The Permittee will not change the slope of the road embankments. In Appendix 5-H the Permittee showed that the embankments would have a minimum static safety factor of 1.3 or greater.

Primary Road Certification

The Permittee did meet the primary road certifications for the Bear Canyon Haul Road because the cross sections were certified.

Other Transportation Facilities

The Permittee meet the requirements for other transportation facilities. The Permittee showed the conveyors on Map5-2C.

Findings:

The information provided in the proposed amendment is considered adequate to meet the requirements of this section.

SPOIL AND WASTE MATERIALS

Regulatory Reference: 30 CFR Sec. 701.5, 784.19, 784.25, 817.71, 817.72, 817.73, 817.74, 817.81, 817.83, 817.84, 817.87, 817.89; R645-100-200, -301-210, -301-211, -301-212, -301-412, -301-512, -301-513, -301-514, -301-521, -301-526, -301-528, -301-535, -301-536, -301-542, -301-553, -301-745, -301-746, -301-747.

Analysis:

Coal Mine Waste

The Permittee did not meet the requirements for the use of coal mine waste in modification of the Bear Canyon Haul Road. The Division considers that a disposal site for coal mine waste is a refuse pile and the amendment must contain all the information needed to show that the refuse pile requirements have been met. Those requirements include a map showing the refuse pile as required by R645-301-521.143 and all the requirements of R645-301-536 including the safety factor requirement of 1.5 and R645-301-322.

Findings:

The information provided in the proposed amendment is considered adequate to meet the requirements of this section.

SUPPORT FACILITIES AND UTILITY INSTALLATIONS

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

Analysis:

The Permittee met the requirements of this section. The Permittee updated Appendix 5-A to show the structures and facilities that were added and removed because of the truck loadout expansion.

Findings:

The information provided in the proposed amendment is considered adequate to meet the requirements of 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.

TECHNICAL MEMO

Analysis:

Mining Facilities Maps

The Permittee met the minimum requirements of the regulations by providing maps and cross sections that show the modifications to the coal loadout facility including the road.

Findings:

The information provided in the proposed amendment is considered adequate to meet the requirements of this section.

RECLAMATION PLAN

APPROXIMATE ORIGINAL CONTOUR RESTORATION

Regulatory Reference: 30 CFR Sec. 784.15, 785.16, 817.102, 817.107, 817.133; R645-301-234, -301-412, -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 met the requirements of this section. The truck loadout modification will only require minor modifications to the existing reclamation plan and should not affect the Permittee's ability to achieve approximate original contour requirements.

Findings:

The information provided in the proposed amendment is considered adequate to meet the requirements of this section.

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

TECHNICAL MEMO

The Permittee met the requirements of this section. The truck loadout modification will only require minor modifications to the existing reclamation plan and should not affect the Permittee's ability to meet the backfilling and grading requirements.

Findings:

The information provided in the proposed amendment is considered adequate to meet the requirements of this section.

ROAD SYSTEMS AND OTHER TRANSPORTATION FACILITIES

Regulatory Reference: 30 CFR Sec. 701.5, 784.24, 817.150, 817.151; R645-100-200, -301-513, -301-521, -301-527, -301-534, -301-537, -301-732.

Analysis:

Reclamation

The Permittee did meet the requirements of this section. The Permittee has a include detailed reclamation plans for the coal loadout road in the MRP.

Findings:

The information provided in the proposed amendment is considered adequate to meet the requirements of this section.

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 Permittee met the requirements of this section of the regulations. Plate 5-2C shows the bonded (disturbed) area.

Reclamation Backfilling And Grading Maps

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The Permittee met the requirements of this section of the regulations. Plate 5-6c shows the reclaimed area.

Final Surface Configuration Maps

The Permittee met the requirements of this section of the regulations. Plate 5-6c shows the reclaimed area.

Findings:

The information provided in the proposed amendment is considered adequate to meet the requirements of this section.

BONDING AND INSURANCE REQUIREMENTS

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

Analysis:

Determination of Bond Amount

The Division determined the amount needed for the Division to reclaim the Bear Canyon Mine in the event of bond forfeiture. That amount is \$2,187,000 in 2008 dollars. The Permittee posted a total bond in the amount of \$2,187,000.

Findings:

The information provided by the Permittee in the proposed amendment is considered adequate to meet the requirements of this section.

RECOMMENDATIONS:

The Division should approve the amendment.