

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

January 14, 2005

TO: Internal File

THRU: D. Wayne Hedberg, Permit Supervisor

FROM: Wayne H. Western, Environmental Scientist III

RE: IBC modification to lease U-68082, Genwal Resources Inc., Crandall Canyon Mine , Permit C/015/0032, Task ID #2090

SUMMARY:

On December 16, 2004, the Division received amendment 2090, which deals with 120-acre incidental boundary change to the permit area. The coal will be sterilized unless it is recovered are part of the Genwal Mine operations.

TECHNICAL MEMO

TECHNICAL ANALYSIS:

ENVIRONMENTAL RESOURCE INFORMATION

PERMIT AREA

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

Analysis:

The Permittee states the legal description and Chapter 1 of the MRP.

Findings:

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

MAPS, PLANS, AND CROSS SECTIONS OF RESOURCE INFORMATION

Regulatory Reference: 30 CFR 783.24, 783.25; R645-301-323, -301-411, -301-521, -301-622, -301-722, -301-731.

Analysis:

Affected Area Boundary Maps

The permit boundary is shown on several maps including Plate 5-2 (H).

Findings:

The information provided in the application is considered adequate to meet the minimum requirements of this section of the regulations.

OPERATION PLAN

COAL RECOVERY

Regulatory Reference: 30 CFR 817.59; R645-301-522.

Analysis:

The coal in the 120-acre IBC is marginally economic to recover because of the low coal thickness. The Permittee estimates that the coal in the 120-acre IBC is approximately 5 feet thick. In Utah coal under five feet thick is usually considered uneconomic to mine.

The only feasible access to the coal in the 120-acre IBC is through the Genwal Mine. If the coal is not recovered as part of the current mining operation the coal will be sterilized.

The Division requested that the Permittee update the R2P2 to show the 120-acre IBC was included. The Permittee did not include an updated copy of the R2P2 with the 120-acre IBC amendment but did include an updated copy with the South Crandall lease. The R2P2 is a document that describes how the Permittee will maximize coal recovery at their operation. Since the updated R2P2 from the South Crandall lease will be incorporated into the MRP the Division no longer considers lack of the updated R2P2 in the 120 acre IBC to be a deficiency.

Findings:

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

SUBSIDENCE CONTROL PLAN

Regulatory Reference: 30 CFR 784.20, 817.121, 817.122; R645-301-521, -301-525, -301-724.

Analysis:

Subsidence Control Plan

The general subsidence control plan in the MRP is adequate and does not need to be modified for the IBC. The 120-acre IBC lease does contain ~~site-specific~~ site-specific subsidence control plan requirements which requirements, which are as follows:

TECHNICAL MEMO

- No second mining (no full extraction) in any area where the overburden is less than 50 times the coal seam height plus 50 feet.
- The general cutoff limit for full extraction mining is coal with less than 300 feet of overburden.

Findings:

The information in the South Crandall amendment meets the minimum requirements of this section of the regulations.

RECLAMATION PLAN

BONDING AND INSURANCE REQUIREMENTS

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

Analysis:

General

No new surface facilities will be built or any new disturbed areas will be added because of the 120 IBC lease addition. Therefore, there will be no change to the bond.

Findings:

The information contained in the South Crandall lease is considered adequate to meet the minimum requirements of this section of the regulations.

RECOMMENDATIONS:

The Division should approve the amendment.