

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

March 28, 2008

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TO: Internal File

THRU: James D. Smith, Permit Supervisor *DS 04/14/08*

FROM: Wayne H. Western, Environmental Scientist/Engineering, Bonding *W H W*

RE: Midterm Review; Genwal Resources Inc., Crandall Canyon Mine, C/015/0032, Task ID #2945

SUMMARY:

The Division initiated the midterm review on February 9, 2006. This memo addresses the engineering and bonding issues. The Division received additional information on February 2, 2007. On March 7, 2008, the Division received additional information.

TECHNICAL ANALYSIS:

OPERATION PLAN

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 Permittee meet the minimum requirements for the subsidence control plan. The subsidence control plan in the MRP is complete.

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Findings:

The information in the MRP is adequate to meet the minimum 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.

Analysis:

Mining Facilities Maps

The Permittee meet the requirements of R645-301-521.150 and R645-301-521.151. The Permittee showed the contours or angle of inclination for all areas that are within 100 feet of the disturbed area boundaries.

Findings:

The information in the MRP is adequate to meet the minimum requirements of this section.

RECLAMATION PLAN

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:

Final Surface Configuration Maps

The Permittee did meet the minimum requirements of this section. The Permittee updated all reclamation maps and cross sections in the MRP.

Findings:

The information in the MRP is adequate to meet the minimum 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 Permittee meet the requirements of this section. Because of other permitting actions (emergency drill hole reclamation), the Division and the Permittee agreed that any bond adjustments would be handled in other amendments.

Findings:

The information in the MRP is adequate to meet the minimum requirements of this section.

RECOMMENDATIONS:

The Division should approve the amendment. The clean copies that the Permittee gives the Division must include maps that registered professional engineer signed as well as stamped