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United States Department of the Interior

BUREAU OF LAND MANAGEMENT
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DIV. OF OIL, GAS & MINING
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IN REPLY REFER TO:

3480
UT (923)
U-68082
U-54762
U-78593
U-80659 LMU

Certified Mail—Return Receipt Requested 7008 1140 0000 3706 0904

Mr. David Hibbs
Director, Engineering
UtahAmerican Energy, Inc.
P.O. Box 1077
Price, Utah 84501

Re: Resource Recovery and Protection Plan (R2P2) modification for the Crandall Canyon
Logical Mining Unit Application U-80659

Dear Mr. Hibbs:

The Bureau of Land Management (BLM) received your R2P2 modification for the Crandall Canyon Logical Mining Unit application on February 19, 2009 (See Attachment 1). We find the following deficiencies in your submittal.

1. The map that the information is presented is not-up-to date.
2. The timing must be shown on the map for the area to be mined. This should be by month and year.
3. The previous approved R2P2 dated February 23, 2005 (See Attachment 2) shows mining the pillars in the main entries. 43 CFR 3482.2 (c)(2), states in part, that the operator shall submit a written statement along with a justification for the change. The previous plan that was approved by BLM showed the mining of the main pillars. BLM cannot approve a plan that does not meet Maximum Economic Recovery (43 CFR 3482.2(2)).

4. The mining method at the time of the latest approval was longwall. The longwall has since been removed. Since this plan has been changed to room and pillar, then the lessee must address how the coal will be mined, including sequence, production rates, and estimated recovery factors (43 CFR 3482.1 (c)(3)(ii) and the basis for each item.
5. Included with your submittal must be an estimate (and calculations) of the recoverable coal reserves for the area (43 CFR 3482.1(c)(3)(iii).
6. Location of any pillars will be left with an explanation of why the pillars cannot be mined (43 CFR 3482.1(c)(4)(v)(C).
7. A sketch of typical entry system for main development and panel development entries showing center-line distance between entries and crosscuts along with panel recovery showing development and retreat(43 CFR 3482.1 (c)(4)(v)(D&E).
8. An explanation of how MER will be achieved and if any coal is not mined then appropriate justification shall be submitted (43 CFR 3482.1(7)).
9. Federal and LMU boundaries must be shown.
10. Isopach maps of the coal seam or bed (43 CFR 3482.1(c)(4)(ii)

If you have any questions, please contact Stan Perkes (801-539-4036) of my staff.

Attachment 1 – Approved R2P2 23 February 2005

Attachment 2 - New R2P2 19 February 2009

s/ Roger L. Bankert

Roger L. Bankert
Minerals Branch Chief

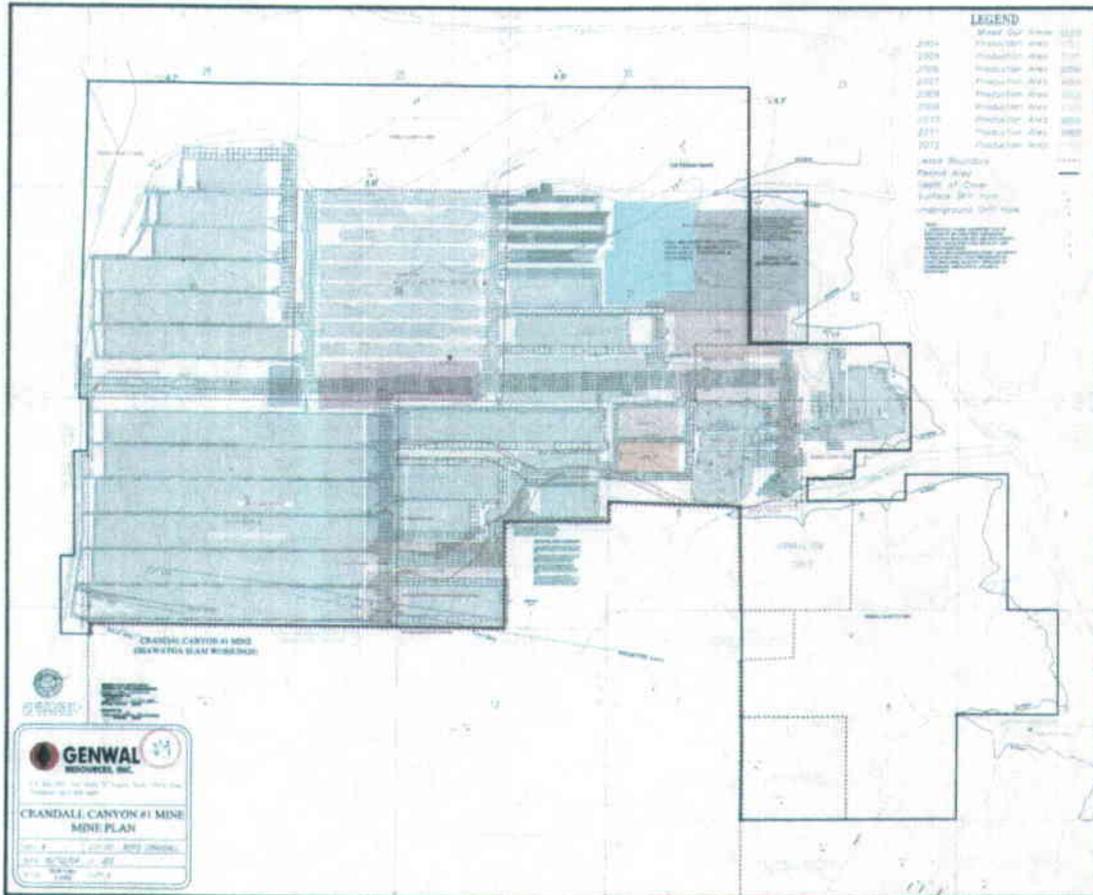
cc: PFO

Utah Division of Oil, Gas, and Mining (Attn. Daron Haddock), 1594 West North Temple,
Suite 1210, Box 145801, Salt Lake City, UT 84114-5801

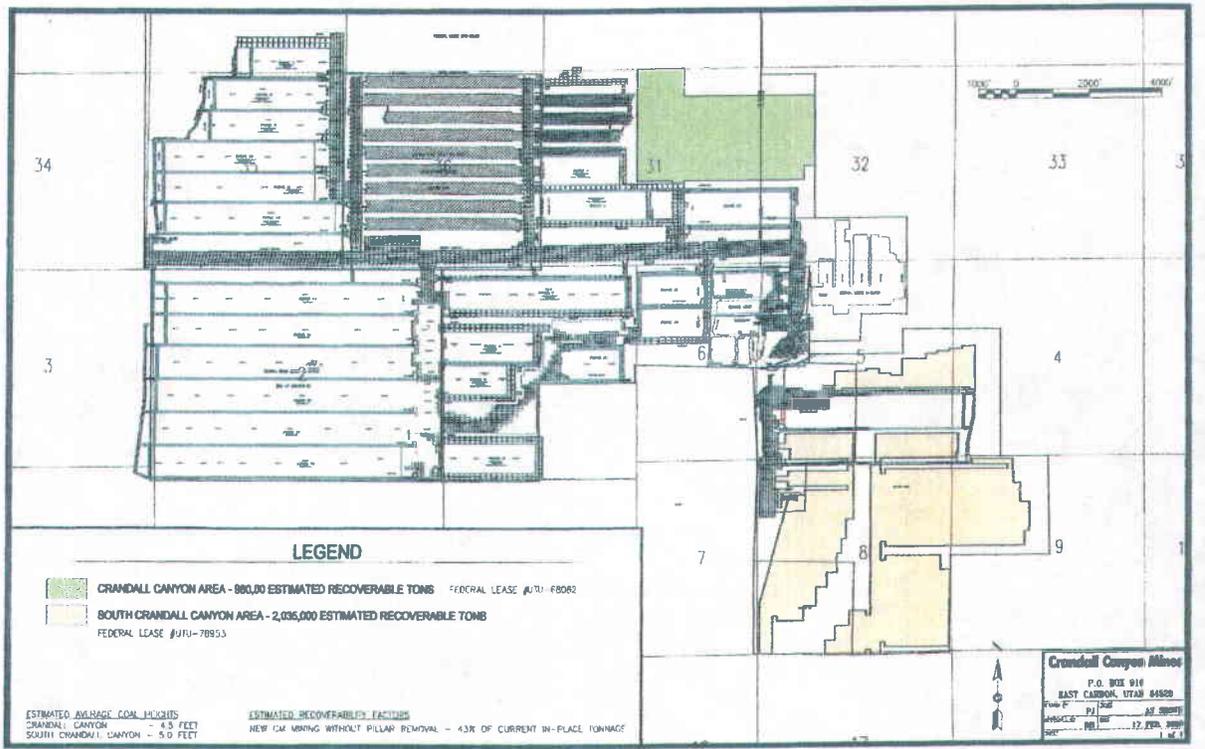
Files - UTU-68082

Chron File

Deficiencieswithoutmap8-13-09SP-SA



Attachment 2: Approved LMU R2P2 (North Crandall Only), 23 February 2005



Attachment 1: Modified LMU R2P2 19 February 2009