



Alton Coal Development, LLC

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January 23, 2008

Pamela Grubaugh-Littig
 Department of Natural Resources
 Utah Division of Oil, Gas & Mining
 1594 West North Temple, Suite 1210
 Salt Lake City, UT 84114

J. Kelly
C/025/0005
#2910

**Re: *Mine and Reclamation Plan-Deficiencies Submittal
 Coal Hollow Project, Kane County, Utah, C/025/0005***

Dear Ms. Grubaugh-Littig:

Alton Coal Development, LLC is pleased to provide this submittal addressing the deficiencies in the Coal Hollow Project application (C/025/0005) for a surface mining operation near Alton, Utah. The enclosed application revisions directly address each item specified in the written correspondence from your office, "Administrative Completeness Review-Determined Not Complete", dated August 27, 2007. A follow up meeting to this correspondence took place September 14, 2007 with members of your staff to clarify information provided in the written document. Notes from this meeting and the written correspondence are enclosed.

The following is an overview of the contents and a brief description of how each deficiency is addressed:

Chapter 1

- *Introduction:* The introduction has been revised to include the anticipated operating hours at the Coal Hollow Project
- *301-117 Proof of Publication:* A revised proposed advertisement is provided along with a location map.
- *301-123 Notarized Signature of Responsible Official:* The authorized signature has been updated to reflect a personnel change within Alton Coal Development.
- *301-130: Information Collection:* The list of contributors has been updated and information related to the 1987 vegetation data has been removed from the application and updated with 2007 vegetation data.

Chapter 2

- *301-200, Soils:* Chapter 2 text has been revised to include data from the fall 2007 order 2 soils survey.

File in:

C/025/0005, 2008, Incoming

Refer to:

- Confidential
 Shelf
 Expandable

Date *1-23-08* For additional information

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- *301-222, Appendix 2-1*: Appendix 2-1 has been updated with a fall 2007 order 2 soils survey. This survey extends the soil data and descriptions to the entire permit area and some adjacent property.
- *301-222, Drawing 2-1*: Drawing 2-1 has been updated to include the fall 2007 soil survey.

Chapter 3

- *301-300, Biology*: Chapter 3 text and color photos have been revised to include information from the fall 2007 vegetation sampling.
- *301-322, Appendix 3-4*: An additional appendix (Appendix 3-4) is added to provide the updated vegetation sampling performed in the fall of 2007.
- *301-322, Drawing 3-1*: Drawing 3-1 replaces 3-1 and 3-1b in the original submittal. This drawing is the updated vegetation map that includes the entire project area and some adjacent property.
- *301-322, Chapter 4 text reference to Drawing 3-1b*: Pages 4-6, 4-7 and 4-8 are revised to reference Drawing 3-1 instead of Drawing 3-1b.

Chapter 5

- *Miscellaneous Text Revisions*: Several pages are revised to clarify noncoal waste disposal practices and to update soil reclamation data based on the order 2 soils survey.
- *Appendices Certification*: Drawings provided in Appendix 5-1 are resubmitted certified by a professional engineer. Appendix 5-2 and 5-3 are resubmitted certified by a professional engineer.

Chapter 6

- *301-621, Drillhole CH-04-05*: Text is added to page 6-8 to clarify that CH-04-05 was planned but not drilled. Also, text on 6-8 is updated to include 2007 drillholes.
- *301-621, Appendix 6-2*: Appendix 6-2 is updated to include new acid- and toxic - forming data and a preliminary radiation assessment.
- *Table 6-1*: This table is updated to provide the 2007 drilling information
- *Appendix 6-1*: 2007 field and computer generated geologic logs are added
- *Drawing 6-6*: This drawing was missing in original submittal and is now submitted.
- *Drawings 6-7 and 6-8*: These drawings are resubmitted with corrections to the vertical scales on the sections.

Chapter 7

- *Table of Contents*: The table of contents is updated to reflect the changes in the text.
- *301-731.200, Water Monitoring*: Page 7-44 is revised with additional text related to a baseline water quality list
- *301-740, Plans and Designs*: Sections 733 through 765 have been revised to include details for impoundments, diversions, spillways and sediment controls.

- *Table 6 and 7:* Tables are replaced with Tables 6a, 6b,7a and 7b to provide baseline surface and ground water parameters
- *R645-302-320, Alluvial Valley Floor:* Drawing 7-7 is updated to show subirrigated and historical flood irrigated areas
- *R645-302-320, Alluvial Valley Floor:* Appendix 7-7 is a new appendix addressing the Alluvial Valley Floor investigation.

Each individual deficiency is separated by a yellow sheet that provides a brief description of the information and the location where the content belongs in the Mine and Reclamation Plan.

Alton Coal Development, LLC appreciates the opportunity to submit this information and looks forward to the subsequent processing of the application to mine at the Coal Hollow Project. Please do not hesitate to contact me if you have any questions.

Sincerely,

A handwritten signature in cursive script, appearing to read "Chris R. McCourt".

Chris R. McCourt, PE

APPLICATION FOR COAL PERMIT PROCESSING

Permit Change New Permit Renewal Exploration Bond Release Transfer

Permittee: Alton Coal Development, LLC

Mine: Coal Hollow Project

Permit Number: C/025/0005

Title: Administrative Completeness Review-Revisions

Description, Include reason for application and timing required to implement:

Information to address deficiencies in the Mine and Reclamation Plan as submitted June 2007

Instructions: If you answer yes to any of the first eight (gray) questions, this application may require Public Notice publication.

- | | |
|---|---|
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 1. Change in the size of the Permit Area? Acres: _____ Disturbed Area: _____ <input type="checkbox"/> increase <input type="checkbox"/> decrease. |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 2. Is the application submitted as a result of a Division Order? DO# _____ |
| <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | 3. Does the application include operations outside a previously identified Cumulative Hydrologic Impact Area? |
| <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | 4. Does the application include operations in hydrologic basins other than as currently approved? |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 5. Does the application result from cancellation, reduction or increase of insurance or reclamation bond? |
| <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | 6. Does the application require or include public notice publication? |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 7. Does the application require or include ownership, control, right-of-entry, or compliance information? |
| <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | 8. Is proposed activity within 100 feet of a public road or cemetery or 300 feet of an occupied dwelling? |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 9. Is the application submitted as a result of a Violation? NOV # _____ |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 10. Is the application submitted as a result of other laws or regulations or policies?
<i>Explain:</i> _____ |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 11. Does the application affect the surface landowner or change the post mining land use? |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 12. Does the application require or include underground design or mine sequence and timing? (Modification of R2P2) |
| <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | 13. Does the application require or include collection and reporting of any baseline information? |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 14. Could the application have any effect on wildlife or vegetation outside the current disturbed area? |
| <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | 15. Does the application require or include soil removal, storage or placement? |
| <input type="checkbox"/> Yes <input type="checkbox"/> No | 16. Does the application require or include vegetation monitoring, removal or revegetation activities? |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 17. Does the application require or include construction, modification, or removal of surface facilities? |
| <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | 18. Does the application require or include water monitoring, sediment or drainage control measures? |
| <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | 19. Does the application require or include certified designs, maps or calculation? |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 20. Does the application require or include subsidence control or monitoring? |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 21. Have reclamation costs for bonding been provided? |
| <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | 22. Does the application involve a perennial stream, a stream buffer zone or discharges to a stream? |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 23. Does the application affect permits issued by other agencies or permits issued to other entities? |

Please attach four (4) review copies of the application. If the mine is on or adjacent to Forest Service land please submit five (5) copies, thank you. (These numbers include a copy for the Price Field Office)

I hereby certify that I am a responsible official of the applicant and that the information contained in this application is true and correct to the best of my information and belief in all respects with the laws of Utah in reference to commitments, undertakings, and obligations, herein.

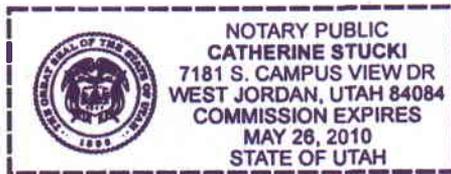
Chris R. McCourt
Print Name

Chris R. McCourt, Manager, 1-22-08
Sign Name, Position, Date

Subscribed and sworn to before me this 22 day of January, 2008

Catherine Stucki
Notary Public

My commission Expires: _____
Attest: State of Utah 5-26, 2010 } ss:
County of Iron



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Assigned Tracking Number:

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APPLICATION FOR COAL PERMIT PROCESSING

Detailed Schedule Of Changes to the Mining And Reclamation Plan

Permittee: Alton Coal Development, LLC

Mine: Coal Hollow Project

Permit Number: C/025/0005

Title: Administrative Completeness Review-Revisions

Provide a detailed listing of all changes to the Mining and Reclamation Plan, which is required as a result of this proposed permit application. Individually list all maps and drawings that are added, replaced, or removed from the plan. Include changes to the table of contents, section of the plan, or other information as needed to specifically locate, identify and revise the existing Mining and Reclamation Plan. Include page, section and drawing number as part of the description.

DESCRIPTION OF MAP, TEXT, OR MATERIAL TO BE CHANGED

			DESCRIPTION OF MAP, TEXT, OR MATERIAL TO BE CHANGED
<input type="checkbox"/> Add	<input checked="" type="checkbox"/> Replace	<input type="checkbox"/> Remove	Volume 1, Introduction
<input type="checkbox"/> Add	<input type="checkbox"/> Replace	<input type="checkbox"/> Remove	Volume 1, Chapter 1 - Appendix 1-5, Proof of Publication
<input type="checkbox"/> Add	<input checked="" type="checkbox"/> Replace	<input type="checkbox"/> Remove	Volume 1, Chapter 1 - Appendix 1-6, Responsible Official Signature
<input type="checkbox"/> Add	<input checked="" type="checkbox"/> Replace	<input type="checkbox"/> Remove	Volume 1, Chapter 1 - Pages 1-8 and 1-9, List of Contributors
<input type="checkbox"/> Add	<input checked="" type="checkbox"/> Replace	<input type="checkbox"/> Remove	Volume 1, Chapter 2 - Chapter 2 Table of Contents and Text
<input type="checkbox"/> Add	<input checked="" type="checkbox"/> Replace	<input type="checkbox"/> Remove	Volume 1, Chapter 2 - Appendix 2-1
<input type="checkbox"/> Add	<input checked="" type="checkbox"/> Replace	<input type="checkbox"/> Remove	Volume 1, Chapter 2 - Drawing 2-1
<input type="checkbox"/> Add	<input checked="" type="checkbox"/> Replace	<input type="checkbox"/> Remove	Volume 2, Chapter 3 - Chapter 3 Table of Contents, Color Photos and Text
<input checked="" type="checkbox"/> Add	<input type="checkbox"/> Replace	<input type="checkbox"/> Remove	Volume 2, Chapter 3 - Appendix 3-4
<input type="checkbox"/> Add	<input checked="" type="checkbox"/> Replace	<input type="checkbox"/> Remove	Volume 2, Chapter 3 - Drawing 3-1 (Replaces Drawing 3-1 and 3-1b)
<input type="checkbox"/> Add	<input checked="" type="checkbox"/> Replace	<input type="checkbox"/> Remove	Volume 2, Chapter 4 - Pages 4-6, 4-7 and 4-8
<input type="checkbox"/> Add	<input checked="" type="checkbox"/> Replace	<input type="checkbox"/> Remove	Volume 3, Chapter 5 - Pages 5-41, 5-54, 5-56 and 5-58
<input type="checkbox"/> Add	<input checked="" type="checkbox"/> Replace	<input type="checkbox"/> Remove	Volume 3, Chapter 5, Appendix 5-1 - Figures 11, 12, 13, 14 and 15
<input type="checkbox"/> Add	<input checked="" type="checkbox"/> Replace	<input type="checkbox"/> Remove	Volume 3, Chapter 5 - Appendix 5-2
<input type="checkbox"/> Add	<input checked="" type="checkbox"/> Replace	<input type="checkbox"/> Remove	Volume 3, Chapter 5 - Appendix 5-3
<input type="checkbox"/> Add	<input checked="" type="checkbox"/> Replace	<input type="checkbox"/> Remove	Volume 5, Chapter 6 - Page 6-8
<input type="checkbox"/> Add	<input checked="" type="checkbox"/> Replace	<input type="checkbox"/> Remove	Volume 5, Chapter 6 - Appendices 6-1 and 6-2
<input type="checkbox"/> Add	<input checked="" type="checkbox"/> Replace	<input type="checkbox"/> Remove	Volume 5, Chapter 6 - Drawings 6-7 and 6-8
<input checked="" type="checkbox"/> Add	<input type="checkbox"/> Replace	<input type="checkbox"/> Remove	Volume 5, Chapter 6 - Drawing 6-6
<input type="checkbox"/> Add	<input checked="" type="checkbox"/> Replace	<input type="checkbox"/> Remove	Volume 6, Chapter 7 - Table of Contents
<input type="checkbox"/> Add	<input checked="" type="checkbox"/> Replace	<input type="checkbox"/> Remove	Volume 6, Chapter 7 - Pages 7-49 through 7-81
<input checked="" type="checkbox"/> Add	<input type="checkbox"/> Replace	<input type="checkbox"/> Remove	Volume 6, Chapter 7 - Appendix 7-7 Alluvial Valley Floor Investigation
<input type="checkbox"/> Add	<input checked="" type="checkbox"/> Replace	<input type="checkbox"/> Remove	Volume 6, Chapter 7 - Table 6 is replaced by Tables 6a and 6b
<input type="checkbox"/> Add	<input checked="" type="checkbox"/> Replace	<input type="checkbox"/> Remove	Volume 6, Chapter 7 - Table 7 is replaced by Tables 7a and 7b
<input type="checkbox"/> Add	<input checked="" type="checkbox"/> Replace	<input type="checkbox"/> Remove	Volume 6, Chapter 7 - Page 7-44
<input type="checkbox"/> Add	<input checked="" type="checkbox"/> Replace	<input type="checkbox"/> Remove	Volume 6, Chapter 7 - Drawing 7-7
<input type="checkbox"/> Add	<input type="checkbox"/> Replace	<input type="checkbox"/> Remove	
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Any other specific or special instruction required for insertion of this proposal into the Mining and Reclamation Plan.

Each deficiency is separated by a yellow sheet that has a brief description and explains where to insert it in the Mine and Reclamation Plan.

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