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TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

February 10, 2011

TO: Internal File

THRU: Priscilla Burton, Environmental Scientist III, Team Lead *PWB by SCS*

FROM: James Owen, Engineer *JO*

RE: Change to Mining Sequence, Alton Coal Development, LLC, Coal Hollow Mine, C/025/0005, Task #3735

SUMMARY:

On February 7, 2011, the Division of Oil, Gas & Mining received an application for a revision to the Coal Hollow Mine and Reclamation Plan (MRP). The amendment consists of changes in the proposed mining sequence, top soil storage, and subsoil storage within the first year. The desired changes were a result of a review of the economic feasibility of the mining sequence, conducted by the applicant, and discussed with Division staff prior to submittal of the application. Because of the timing issues associated with the mining sequence process, the applicant requested that the application review be expedited.

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TECHNICAL ANALYSIS:

OPERATION PLAN

MINING OPERATIONS AND FACILITIES

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

Analysis:

The application includes plans to change the sequence in which the pits will be mined. Pits will be mining in a more logical order, allowing the mine more flexibility in terms of hauling overburden to fill a previously mined pit.

Findings:

Contents and information provided are sufficient enough to meet the minimum requirements of this section of the Utah Coal Mining Rules.

RECLAMATION PLAN

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:

The backfilling a grading sequence will be modified to mirror the mining sequence. This is due to the fact that back filling and grading will proceed in conjunction with coal recovery operations.

Findings:

Contents and information provided are sufficient enough to meet the minimum requirements of this section of the Utah Coal Mining Rules.

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:

A coal removal sequence map (Drawing 5-10) was submitted with the application. The map depicts the changes in the mining sequence. The map has been properly certified by a licensed professional engineer.

Findings:

Contents and information provided are sufficient enough to meet the minimum requirements of this section of the Utah Coal Mining Rules.

RECOMMENDATIONS:

The application is recommended for approval.