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TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

July 27, 2011

TO: Internal File

FROM: Priscilla Burton, Team Lead *PWB/bm sgs*

RE: Coal Hollow Drainage Control Adjustments, Alton Coal Development, Coal Hollow Mine Permit C/025/0005, Task ID #3862

SUMMARY:

On June 20, 2011 the Division received a response to items outlined during a meeting between Alton Coal Development and the Division on May 5, 2011 (see Meeting Notes in the Internal File). This amendment responds to two soils related issues: Task 3812 missing IML reports have been provided and Task 3812 item 2: MRP Section 528.350 has been amended to provide a commitment for sampling coal remaining in each pit.

TECHNICAL ANALYSIS:

OPERATION PLAN

TOPSOIL AND SUBSOIL

Regulatory Reference: 30 CFR Sec. 817.22; R645-301-230.

Analysis:

Topsoil Removal and Storage

Appendix 2-1, p. 1-5 explains that 40 of the 182 soil pits were sampled for analysis. Missing information in IML Report dated 11/13/2006, work order # SO609512 and IMP Report dated 11/14/2006, work order # S0610051. Once incorporated, the information on these 40 samples will be found in Appendix C of App. 2-1.

TECHNICAL MEMO

Soil sampling information from soils salvaged and stored in existing topsoil and subsoil stockpiles is overdue and should be provided to the Division without further delay.

Findings:

The information should be approved and incorporated.

HYDROLOGIC INFORMATION

Regulatory Reference: 30 CFR Sec. 773.17, 774.13, 784.14, 784.16, 784.29, 817.41, 817.42, 817.43, 817.45, 817.49, 817.56, 817.57; R645-300-140, -300-141, -300-142, -300-143, -300-144, -300-145, -300-146, -300-147, -300-147, -300-148, -301-512, -301-514, -301-521, -301-531, -301-532, -301-533, -301-536, -301-542, -301-720, -301-731, -301-732, -301-733, -301-742, -301-743, -301-750, -301-761, -301-764.

Analysis:

Acid- and Toxic-Forming Materials and Underground Development Waste

The amendment states in Section 528.350 of the MRP that coal remaining in the pit backfill will be sampled at the rate of 1 sample/5,000 tons remaining and analyzed in accordance with Tables 3 and 7 of the Division's 2008 Topsoil and Overburden Guidelines. Records will be kept onsite.

Findings:

This information should be approved and incorporated.

RECOMMENDATIONS:

The soils analysis and coal sampling information provided with this amendment should be approved and incorporated.

Soil sampling information from soils salvaged and stored in existing topsoil and subsoil stockpiles is overdue and should be provided to the Division without further delay.