

OGMCOAL - Re: mine inspection questions

From: Daron Haddock
To: Bobbi Bryant
Date: 2/16/2011 5:04 PM
Subject: Re: mine inspection questions
CC: April Abate; Joe Helfrich; OGMCOAL
Attachments: DWG. 5-25.pdf

Hi Bobbi;

Hopefully I can answer your questions. With regard to the bond, Mine Companies are allowed to do incremental bonding. In other words they bond for a certain amount of disturbance within the approved permit area. In Coal Hollow's case they are approved to disturb 435 acres during the life of the mine, but they have only bonded to disturb 289 acres at this time. This means they cannot disturb more than 289 acres until they have either posted additional bond or reclaimed part of the disturbance that they have already made. The 435 acres that Priscilla referred to has not all been disturbed yet, it is only approved to be disturbed at some point in the future and then only when it is covered by the bond.

As for the drainage at the site--Sediment Ponds 1, 1B, 2, and 3 have all been constructed at the facility. Mine personnel refer to Pond 1 as Pond 1A, which is why April listed it that way in the notes. Joe and April are referring to the same diversion ditches (i.e. DD2 is the same as D2). I agree, we should all come to agreement on nomenclature and be consistent with it in the reports. It may be helpful to view a map of these drainage controls (see attached). According to the most recent inspection report dated 2.2.11, construction on all diversions is now complete (i.e. DD-2, DD-3, and DD-4). I hope this helps.

Sincerely,

Daron R. Haddock
 Coal Program Manager
 Utah Division of Oil, Gas & Mining
 (801) 538-5325

>>> Bobbi Bryant <broncobobbi@gmail.com> 2/16/2011 9:42 AM >>>

Daron - I want to thank you again for sending me the inspection reports. I hope you can clarify a few things for me. In Priscilla's inspection report of 12/02/10 she states that ACD has given proof of a surety bond to cover 289 acres of disturbance which was the projected disturbed area for the 1st year. Her report of that date and subsequent reports show total disturbed area being 435 acres. Can you explain the difference of what she states will be first year disturbance and what is actually shown as being disturbed and what the surety bond is for.

On 1/13/11 April Abate did an inspection and stated that pond 1A, 1B, 2 and 3 were complete. In the report done on 1/19/11 by Joe Helfrich he shows only pond 1 (no mention of A or B) and pond 2 complete but needs cover. Cover? No mention of this being needed in April's report and she shows 4 ponds total being complete a week before Joe was there. So what is the status?

April in her report comments on DD2 and DD4 and in Joe's report he comments on D2 and D3. Is DD2 and D2 two different diversions? April states that DD2 is not complete and modifications were approved by her upon the request of ACD. She makes no mention of D3 (DD3?) but Joe states in his report of 1/19 that D2 is complete and D3 was nearly complete but makes no mention of D4 (DD4?). Seems sequences of completion on these diversions are not reported correctly or they are completed out of order. I am confused.

In the report of 2/2/11 done by Joe Helfrich he states that all diversion ditches and sediment ponds are complete however he does not indicate which ponds and which diversions. Since both he and April commented on different ones am I to assume that D1 through 4 is completed and ponds 1a, 1b, 2 and 3 are completed.

(I'll be the first to admit I make typos and misspells from time to time but both April and Joe should read their reports before finalizing them as these reports are seen by individuals, state officials, general public and media. It could easily be misinterpreted that sloppy reports are a reflection of sloppy inspections.)

Thanks again for your help.

Bobbi

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Range 6 West
Range 5 West

N

Township 39 South

- LEGEND:**
- PERMIT BOUNDARY
 - PRIVATE COAL OWNERSHIP
 - SECTION LINE
 - FOUND SECTION CORNER
 - FOUND PROPERTY CORNER
 - PROPOSED SEDIMENT IMPOUNDS
 - DIVERSION DITCHES
 - EXISTING DRAINAGES

DRAWN BY:
J. STANSFIELD

DRAWING:
5-25

JOB NUMBER:
1400

CHECKED BY:
CRM/GG

DATE:
4/20/07

SCALE:
1" = 500'

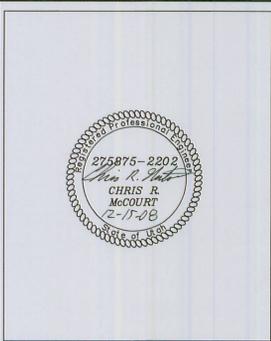
SHEET

REVISIONS	
DATE:	BY:
12/02/08	CRM

DIVERSION DITCH & SEDIMENT IMPOUND PLAN VIEW

COAL HOLLOW PROJECT
ALTON, UTAH

DRAWING: 5-25



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Coal Hollow Project

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