



OGMCOAL DNR &lt;ogmcoal@utah.gov&gt;

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**Fwd: Alton Coal Development Response to Division Order 15-A**

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**Daron Haddock** <daronhaddock@utah.gov>

Wed, Apr 1, 2015 at 7:23 AM

To: Suzanne Steab &lt;suzannesteab@utah.gov&gt;, OGMCOAL DNR &lt;ogmcoal@utah.gov&gt;, Cheryl Parker &lt;cherylparker@utah.gov&gt;

More information in response to DO-15.

----- Forwarded message -----

From: **Dragoo, Denise** <ddragoo@swlaw.com>

Date: Tue, Mar 31, 2015 at 11:18 PM

Subject: Alton Coal Development Response to Division Order 15-A

To: Dana Dean &lt;danadean@utah.gov&gt;

Cc: Daron Haddock &lt;daronhaddock@utah.gov&gt;, Steve Alder &lt;stevealder@utah.gov&gt;

Dana, on behalf of Alton Coal Development, LLC, we are responding to item 4 of the February 3, 2015 Division Order. As set forth in our letter dated March 2, 2015, ACD complied with the first 3 of the 5 alleged permit deficiencies prior to the issuance of the Division Order. Also, in response to our March 2, 2015 letter, the Division clarified that ACD has until the first of May to respond to finding #5, requiring that "backfilling and grading must continue so that it is clear that the cost of any remaining reclamation is well below the amount of the bond currently being held." ACD understands this finding to require the operator to show that the reclamation calculations, including bond release applications, demonstrate that the \$12.75 million bond currently held by the Division is adequate upon completion of backfilling and grading. Attached is a draft map of the South Area reclamation which supports these bond calculations. We will hand deliver the calculations to you following our meeting scheduled with you tomorrow at 1:00 pm. We appreciate your consideration in this matter. Denise

Denise A. Dragoo

Snell &amp; Wilmer L.L.P.

15 West South Temple

Suite 1200

SLC, UT 84101

Phone: 801-257-1998

Fax: 801-257-1800

**Snell & Wilmer**

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Daron R. Haddock

Coal Program Manager  
Utah Division of Oil, Gas & Mining  
[\(801\) 538-5325](tel:8015385325)



**SouthAreaBond\_MarchReCalc\_ReclamationPolys\_21290696\_1.PDF**

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