



OGMCOAL DNR <ogmcoal@utah.gov>

Disturbed Acres

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Mon, Jan 5, 2015 at 2:01 PM

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Drew and Kirk

I'm going back through the excel file you sent me, along with the Figure 1 showing the disturbance current as of Dec14 and having trouble getting the total disturbance acres to add up to the same number. I was hoping you could provide some clarification:

1. In the excel file, Dec Material Movement tab
 - Did the Survey of Total Disturbance include the main office, ponds and shop facilities?
 - Below that there are cells showing the Backfill, Subsoil, and Topsoil acres, When you sum these numbers you get a total Disturbance of 431.92 Acres. What areas are these cells referencing to get each of the Backfill, Suboil, Topsoil areas? (maybe a figure showing where/how you got these acreages)
2. When you sum the acres for the areas you show in Figure 1 Current Disturbance you only get 80.084 Acres subsoiled, topsoiled, and Undisturbed plus the 6.4 M LCY in backfill areas.

In regards to Figure 1 Current Disturbance:

- There is no blue shading depicting the Backfill areas
- The pond, wells and facilities, which are disturbed areas, are not shown in blue either

3. The Figure 5-3 in the current MRP has you bonded for a total of 418 acres (Mining phase 1 through 3). Attachment 1 shows the current MRP bonded area as well as the proposed changes to Figure 5-3. The total disturbance acreage of the three options in disturbance is shown in the top left.
 - The hatches show the various disturbance areas of the Worst Case Scenario, as described in the current MRP with work in all three mining phases. I'd like to point out that the current worst case scenario includes areas that are being applied for undisturbed.
 - The disturbance around the areas north of the main office that has been decreased, but not called for release as areas that will not be disturbed. This also applies to various road in the current figure 5-3 that do not show up on the pending new Figure 5-3.n Can this ditch be reclaimed without increase the disturbance area similar to the current Figure 5-3?
4. - The proposed new Figure 5-3 is showing undisturbed in areas already not included in the bonded area, specifically the majority of Area 12. See Attachment 2. (Area 12 undisturbed=3.98 Acres)
 - In addition the current disturbance and proposed disturbance area include an area previously not included in the bonded area to the left of Area 8 and then include Area 8 as undisturbed when in the current MRP that area is not in the bonded area already. (NEW area disturbed not included in current MRP bonded area=1.6 Acres and Area 8=no change in bonded area)

5. I'm not sure how you came up with 346 acres as the new disturbance area. Mining Phase I (289 acres)+ Mining Phase II (40 Acres) + proposed 58 acres in new Reclamation Agreement minus the proposed 37.67 Acres undisturbed (erroneous number)=349 acres. With the correct undisturbed acres of 33.7 acres, total disturbance of this scenario = 353 acres. Perhaps a figure showing how you arrived at new 58 disturbance acres and showing the correct mining phase 2 disturbance area, i.e. updated around undisturbed Area 8.

These figures are all digitized so there is error in the exact line up of the MRP version Figure 5-3 and the submitted Figure 5-3 that was negated in area calculations.

I will try to give you a call this afternoon to try to step through these questions,

Thanks,

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3 attachments

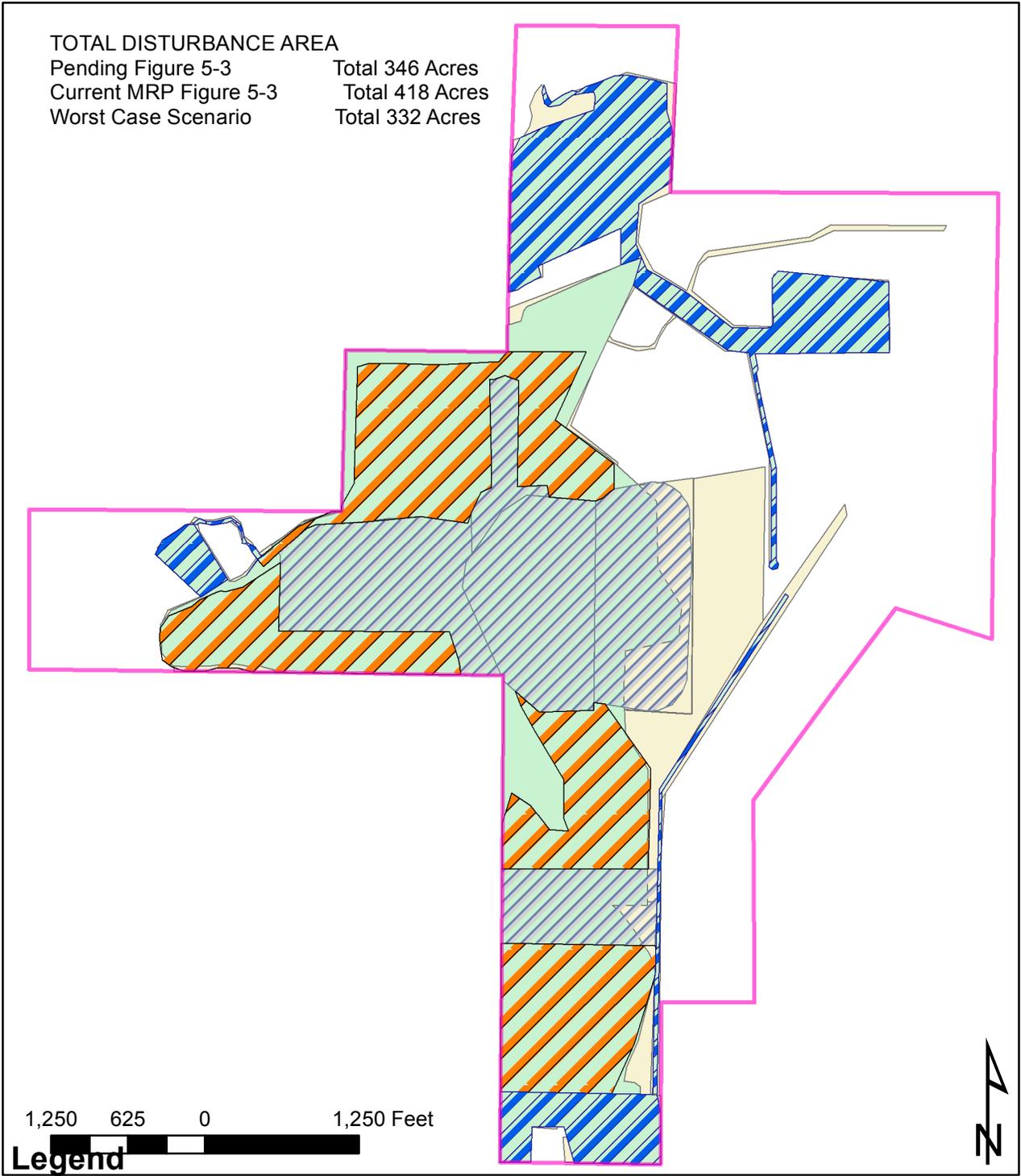
 **Attachment1.pdf**
210K

 **Attachment2.pdf**
235K

 **Attachment3.pdf**
241K

TOTAL DISTURBANCE AREA

Pending Figure 5-3	Total 346 Acres
Current MRP Figure 5-3	Total 418 Acres
Worst Case Scenario	Total 332 Acres

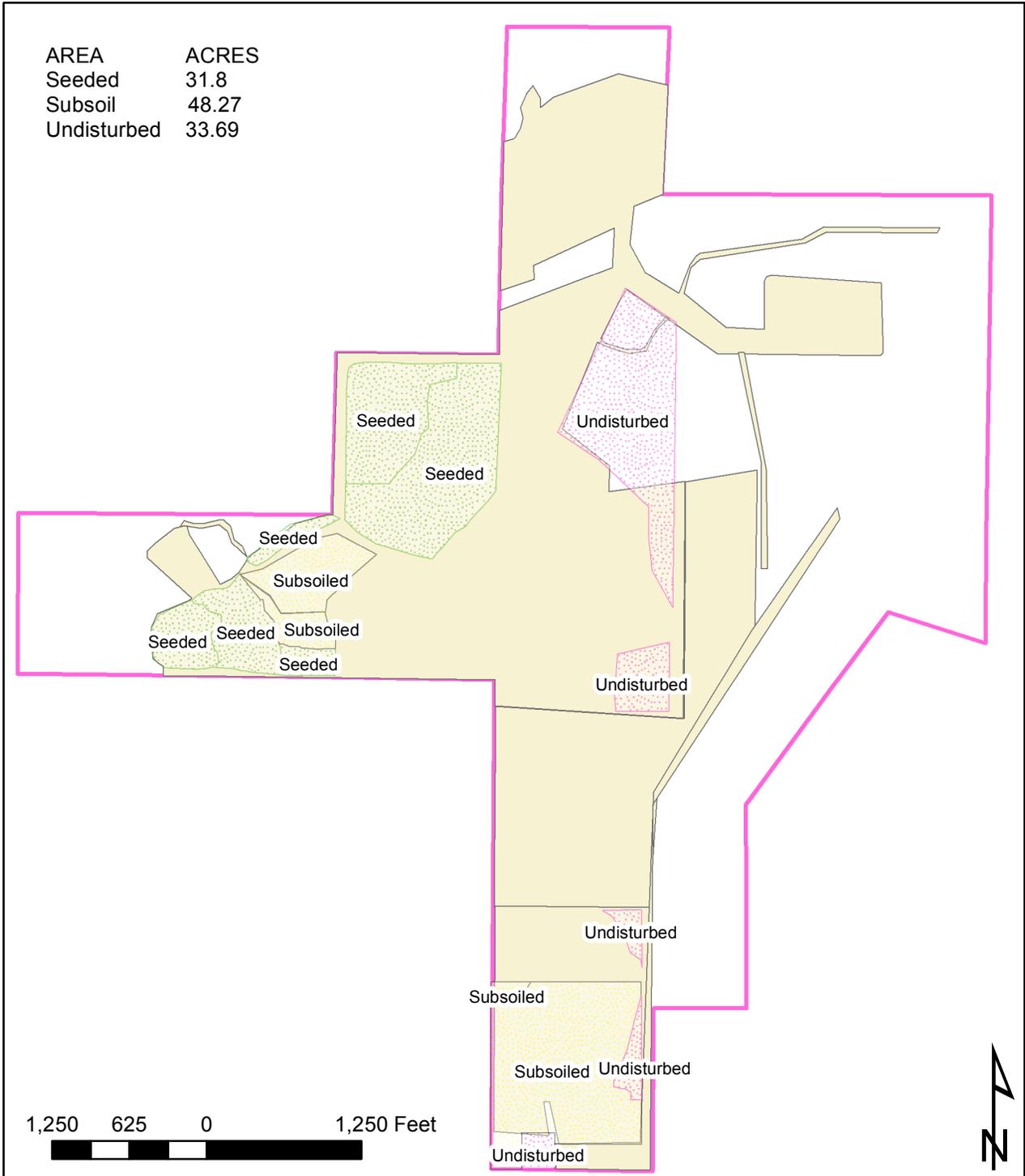


Legend

- | | | |
|-----------------|----------------------------------|-----------------------|
| Permit Area | Active Mining Area | Current MRP Disturbed |
| Facilities Area | Pending 5-3 Edits to Disturbance | |
| Backfilled Area | | |

Comparison of Figure 5-3 Pending to Current MRP Figure 5-3 with Worst Case Scenario Footprint

AREA	ACRES
Seeded	31.8
Subsoil	48.27
Undisturbed	33.69

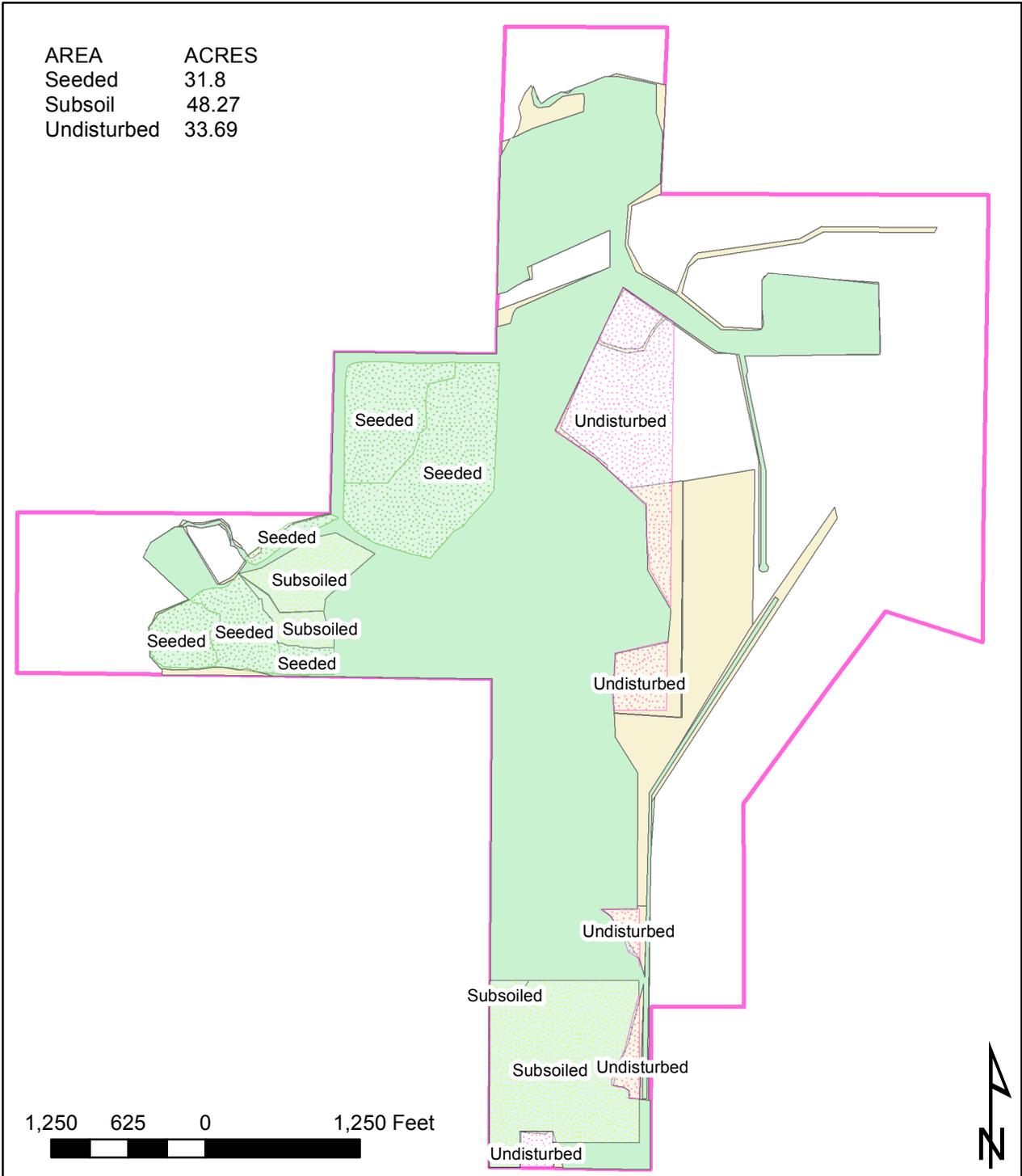


Legend

Phase 1 Bond Release Requested Areas	Subsoiled
Type	Undisturbed
Seeded	Current MRP Disturbed
	Permit Area

Comparison of Figure 5-3 Pending to Current MRP Figure 5-3 with Requested Phase I Bond Release Sites

AREA	ACRES
Seeded	31.8
Subsoil	48.27
Undisturbed	33.69



Legend

Phase 1 Bond Release Requested Areas

Type

Seeded

Subsoiled

Undisturbed

Pending 5-3 Edits to Disturbance

Current MRP Disturbed

Permit Area

Comparison of Figure 5-3 Pending to Current MRP Figure 5-3 with Requested Phase I Bond Release Sites