

# TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

June 27, 2005

TO: Internal File

THRU: Peter H. Hess, Environmental Scientist III/Engineering, Team Lead

FROM: Wayne H. Western, Environmental Scientist III/Engineering

RE: 2004 Midterm Review, Canyon Fuel Company, LLC., SUFCO Mine, C/041/002, Task ID #2068

## **SUMMARY:**

The Division conducted a midterm review for the SUFCO mine as required by R645-303-211.

## **TECHNICAL ANALYSIS:**

## **RECLAMATION PLAN**

## **SUBSIDENCE CONTROL PLAN**

Regulatory Reference: 30 CFR 784.20, 817.121, 817.122; R645-301-521, -301-525, -301-724.

### **Analysis:**

#### **Subsidence Control Plan**

SUFCO committed to subsidence monitoring programs that would be included in the annual subsidence report. They also committed to subsidence monitoring programs that need not be included in the annual report.

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## TECHNICAL MEMO

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SUFCO committed to include the following in the annual report:

- A subsidence map showing shows the areas where subsidence occurred and the amount of subsidence. The map will include all areas where subsidence occurred during the past three years.
- A narrative stating what subsidence activities occurred that year.
- A history of subsidence at the SUFCO mine.

SUFCO committed to conduct the following subsidence activities but did not commit to include them in the annual subsidence report:

- Color inferred photographs of the mine site will be taken at least once every five years.
- Conduct a bi-annual monitoring program to analyze the subsidence cracks related to the undermining of the West Fork of Box Canyon. The monitoring program will include measuring the offset and/or width of portions of selected subsidence cracks. Similar data will also be collected from specified segments of subsidence cracks that occurred away from the walls of the canyon and do not appear to be influenced by the lack of bedrock support created by the canyon.

### Findings:

The information provided in the MRP is not considered adequate to meet the requirements of this section. As part of the midterm review, the Permittee must provide the following in accordance with:

**R645-301-121.200**, The Permittee must state in the MRP: • when (specific years) that the color inferred aerial photographs will be taken, • the location of where the color inferred aerial photographs can be found • when (specific years) the bi-annual monitoring program for the West Fork of Box Canyon will be preformed and • where the information from the bi-annual monitoring program for the West Fork of Box Canyon can be found.

## BONDING AND INSURANCE REQUIREMENTS

Regulatory Reference: 30 CFR Sec. 800; R645-301-800, et seq.

### Analysis:

### **Determination of Bond Amount**

The Permittee did not meet the requirements of the R645 Rules for this section. The Permittee must include a copy of the reclamation cost estimate in the MRP. The Division will give the Permittee a copy of the reclamation cost estimate upon request.

The Division estimates the cost to reclaim the SUFCO mine at \$2,616,000 in 2009 dollars. The current bond is for \$4,439,000, which is \$1,823,000 over the required amount. Therefore, the Division determines that the bond amount is sufficient to ensure reclamation in the event of bond forfeiture.

### **Findings:**

The information provided in the MRP is not considered adequate to meet the requirements of this section. As part of the midterm review, the Permittee must provide the following in accordance with:

**R645-301-830.140**, The Permittee must give the Division updated copies of the detailed reclamation cost estimate. The Division will give the Permittee copies of the updated reclamation cost estimate upon request in either paper or electronic format.

### **RECOMMENDATIONS:**

The Division should require the Permittee to include updated reclamation cost estimates into the MRP.