

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

June 2, 2006

TO: Internal File

THRU: Wayne Hedberg, Permit Supervisor

FROM: Wayne H. Western

RE: East Fork of the East Fork of Box Canyon Rim Subsidence Crack Repair
Proposed Scope of Work, Canyon Fuel Company, LLC., SUFCO, C/041/0002,
Task ID #2547

SUMMARY:

On May 31, 2006, the Division received a letter from Canyon Fuel Company, LLC from the SUFCo Mine that outlined how the Permittee planned to seal subsidence cracks in the East Fork of the East Fork of Box Canyon.

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TECHNICAL ANALYSIS:

OPERATION PLAN

SUBSIDENCE CONTROL PLAN

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

Analysis:

Performance Standards For Subsidence Control

The Permittee will meet the requirements of R645-301-525.510 by repairing subsidence cracks. In a letter dated May 25, 2006 and received by the Division on May 31, 2006, the Permittee outlined a plan to seal subsidence cracks that formed in the East Fork of the East Fork of Box Canyon. The cracks formed during the mining of 5 Left Pines panel in late 2005 and early 2006. Some of the cracks are large enough to be considered a hazard to humans and wildlife.

The Permittee proposed to close the cracks using a combination of the following methods:

- Partially fill the cracks with native rock or Omega blocks.
- Cover the native rock or Omega blocks with polyurethane foam.
- Place soil over the foam after it has cured.
- Surrounding areas will be roughed and seeded.

R645-301-525.510 requires that the Permittee repair damage to surface lands. The Permittee does not have a specific plan to repair subsidence damage in the MRP, but rather make a general commitment in the MRP to repair the damage. The repair plan is consistent with general practices to repair subsidence cracks.

Findings:

Information provided in the letter received on May 31, 2006 is adequate to meet the requirements of R645-301-525.510.

RECOMMENDATIONS:

The Division should allow the Permittee to proceed with the subsidence mitigation plan.