

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

November 17, 2006

TO: Internal File

THRU: Wayne Hedberg, Permit Supervisor, Project Manager *WH*

FROM: Peter H. Hess, Environmental Scientist/Engineering Review. Team Lead *PHH by an*

RE: Electrical Substation Repair and Upgrade, Canyon Fuel Company, LLC, SUFCO Mine, C/041/002, Task ID #2666

SUMMARY:

The Permittee submitted an application to the Division on October 6, 2006 to permit some necessary minor modifications to the electrical substation that is located on the SSE corner of the main Mine facilities disturbed area. During the fall of 2005, a length of the Mine's main intake portal entry collapsed, placing the hillside substation in an area which the Permittee felt was in a hazardous, unstable area. It was necessary for the Permittee to move a main electrical transformer to the lower yard substation area in order to keep the Mine operating. The relocation of high voltage transmission cables was necessary to complete this.

In the interim, the Permittee has redesigned the electrical system to incorporate all of the necessary design changes into the lower yard substation. This requires the installation of some new switchgear and additional room within the substation perimeter fence for the transformers that were previously installed at the hillside substation.

The application also contains an updated, revised PLATE 5-2A, DETAIL OF EAST SPRING CANYON SURFACE FACILITIES, which is being submitted for approval.

OPERATION PLAN

SUPPORT FACILITIES AND UTILITY INSTALLATIONS

Regulatory Reference: 30 CFR Sec. 784.30, 817.180, 817.181; R645-301-526.

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Analysis:

The collapse of a length of the intake portal entry in the fall of 2005 (the main Mine air intake portal) at SUFCO perpetuated itself to the surface, placing the hillside substation, which is located immediately adjacent (approximately 100 feet to the NE) in a location considered unstable. The Permittee found it necessary to take immediate precautions to re-locate the electrical apparatus in that substation in order to prevent a major shutdown and keep the mine operating.

In order to relocate the electrical switchgear and transformers from the hillside substation to the permanent installation in the lower yard substation, it was necessary to increase the fenced area (of the lower substation) by approximately 2,550 square feet. The cyclone fence on the north side of the substation has been moved out approximately twenty feet. Several new concrete pads were necessary in order to securely mount the electrical devices.

All activities will occur within the currently approved mine disturbed area perimeter. It will not be necessary to remove any vegetation or topsoil to increase the size of the substation area. All drainage patterns and sediment control treatments will remain unchanged. The proposed modifications are minor, and will have no affect on the amount of reclamation bond that is in place.

The Permittee has also submitted a revision to pages 5-44, 5-45, and 5-46. These pages compile **TABLE 5-4**, Description of Existing Structures. The single revision consists of a deletion of the reference to the upper (hillside) substation area.

Findings:

This application meets the minimum regulatory requirements of R645-301-526, Mine Facilities.

MAPS, PLANS, AND CROSS SECTIONS OF MINING OPERATIONS

Regulatory Reference: 30 CFR Sec. 784.23; R645-301-512, -301-521, -301-542, -301-632, -301-731, -302-323.

Analysis:

Mining Facilities Maps

As noted above, the Permittee has submitted a revised, updated PLATE 5-2A, DETAIL OF EAST SPRING CANYON SURFACE FACILITIES with the Task ID #2666 application.

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The revised PLATE shows the expansion of the lower substation area, detailing three access gates, as well as the various structures inside the fenced perimeter. PLATE 5-2A also depicts the underground electrical and sewer service lines that will be routed from the lower substation area to the office-building complex.

Also depicted, 175 feet due north of the office building, is the partially reclaimed area where the hillside electrical substation was previously located. A new water chlorinator building with electrical transformer, and a chlorinator vault are depicted. Underground power cables are also shown.

PLATE 5-2A, DETAIL of EAST SPRING CANYON SURFACE FACILITIES is a surface facilities "as-built" map.

Certification Requirements

PLATE 5-2A, DETAIL of EAST SPRING CANYON SURFACE FACILITIES has been certified by Mr. John D. Byars, P.E. Mr. Byars is a Utah registered professional engineer. The minimum regulatory requirements of R645-301-512.120 have been adequately addressed.

Findings:

PLATE 5-2A meets the minimum regulatory requirements of **R645-301-512.100**.

BONDING AND INSURANCE REQUIREMENTS

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

Analysis:

General

The Permittee has submitted (as part of the Task ID #2666 application) a revised reclamation bond estimate, [See APPENDIX 5-9, Reclamation Bond Estimate, (November 14, 2006 submittal)].

Determination of Bond Amount

The Permittee met the minimum requirements for this section. The Permittee provided the Division with detailed reclamation cost estimate for the modifications to the substation.

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Findings:

The Permittee met the minimum requirements of this section.

RECOMMENDATIONS:

The Division should approve the amendment.