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TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

April 2, 2007

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TO: Internal File

THRU: D. Wayne Hedberg, Permit Supervisor *DWH*

FROM: Steve Fluke, Team Lead / Hydrogeologist

RE: East Fork of Box Canyon Video Taping, Canyon Fuel Company LLC, Sufco Mine, C041/0002, Task ID #2703

SUMMARY:

On December 22, 2006, the Division received an amendment from Canyon Fuel Company for the SUFCO MRP. The amendment was submitted in response to conflicting information in the MRP regarding the timing of a post-mining videotaping of the East Fork of Box Canyon. This memo is for the hydrological aspects of the amendment.

The amendment meets the requirements of the R645 Coal Rules and should be approved.

TECHNICAL MEMO

TECHNICAL ANALYSIS:

OPERATION PLAN

HYDROLOGIC INFORMATION

Regulatory Reference: 30 CFR Sec. 773.17, 774.13, 784.14, 784.16, 784.29, 817.41, 817.42, 817.43, 817.45, 817.49, 817.56, 817.57; R645-300-140, -300-141, -300-142, -300-143, -300-144, -300-145, -300-146, -300-147, -300-147, -300-148, -301-512, -301-514, -301-521, -301-531, -301-532, -301-533, -301-536, -301-542, -301-720, -301-731, -301-732, -301-733, -301-742, -301-743, -301-750, -301-761, -301-764.

Analysis:

General

The SUFCO MRP outlines a monitoring and mitigation plan for mining under the East Fork of Box Canyon. The plan is discussed in Chapters 3 and 5 and detailed in Appendix 3-10 of the MRP. One of the requirements of the plan is to videotape the stream channel prior to mining panel 3LPE from Joe's Mill Ponds to the west gate road of 3LPE. The videotaping was conducted according to plan in September 2003. The plan also requires a post-mining video survey to be conducted in the same manner as the pre-mining survey following undermining of the 4 LPE panel. However, the MRP presents conflicting information regarding the timing of the post-mining videotape. The MRP states that the videotape will be conducted the third year following undermining and submitted with the 2006 annual report (p. 3-22A and p. 5-39A), but also states the videotape will be conducted during September 2006 (Appendix 3-10).

The conflicting information was noticed by SUFCO in the fall of 2006 and brought to the Division's attention. Canyon Fuel personnel met with the Division at the end of September 2006 to discuss the timing of the videotaping. It was agreed at that meeting that the intent of the plan was to conduct the post-mining videotaping three years following the undermining of 4 LPE. Since 4 LPE mining left the angle-of-draw of the East Fork of Box Canyon in March 2005, it was agreed that the videotaping should be conducted in September 2008. Canyon Fuel subsequently submitted a letter to the Division dated November 3, 2006 outlining the issue and the proposed solution.

The purpose of the submitted MRP amendment is to clarify the conflicting information in Chapters 3 and 5, and Appendix 3-10. Text has been modified to reflect that the post-mining videotaping of the East Fork of Box Canyon will be conducted in September 2008 and submitted to the Division with the 2009 annual report.

Findings:

The information provided in the amendment meets the requirements of the R645 Coal Rules.

RECOMMENDATIONS:

The amendment meets the requirements of the R645 Coal Rules and should be approved.