

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

June 23, 2009

TO: Internal File

THRU: James Smith, Permit Supervisor, Senior Environmental Scientist, *JS 06/23/09*

FROM: David Darby, Senior Environmental Scientist, Lead *DD*

RE: Approval of Permit Amendment, 2009 Mitigation Activities for the North Water Spring and Joe's Mill Pond Areas, Task ID #3308, Canyon Fuel Company, LLC, SUFCO Mine, C/041/0002.

DEFICIENCIES

None

SUMMARY:

On June 8, 2009 Canyon Fuel Company LLC submitted a revised amendment to the Sufco Mine plan. The proposed mine plan amendment will consist of drilling five boreholes, one at Joe's Mill Ponds and four at the North Water spring area. Stratigraphic data will be collected from the boreholes to determine groundwater availability and movement.

Contact was made with Tom Lloyd, Manti-La Sal National Forest, on June 23, 2009 to see if there Forest Service had any issues with the amendment. He stated that new roads or excess activity should not occur. Only existing roads should be used for travel and kept to a minimum. Sufco will use a helicopter to transport the drilling rig, fresh water tank and pipe from the East Fork of Box Canyon to the sites. Drill pads will not require significant disturbance.

TECHNICAL ANALYSIS:

ENVIRONMENTAL RESOURCE INFORMATION

Regulatory Reference: Pub. L 95-87 Sections 507(b), 508(a), and 516(b); 30 CFR 783., et. al.

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PERMIT AREA

Regulatory Requirements: 30 CFR 783.12; R645-301-521.

Analysis:

All drilling activities are part of an ongoing mitigation investigation project for the North Water Spring area and lies within Sufco's existing lease and permit area. Contact was made with Tom Lloyd, Manti-La Sal National Forest, on June 23, 2009 to see if there Forest Service had any issues with the amendment. He stated that new roads or excess activity should not occur. Only existing roads should be used for travel and kept to a minimum. Sufco will use a helicopter to transport the drilling rig, fresh water tank and pipe from the East Fork of Box Canyon to the sites. Drill pads will not require significant disturbance.

Archeological studies have been conducted and submitted to the MRP.

Findings:

The Permittee has addressed the minimum requirements of the Permit Area Section of the regulations.

GEOLOGIC RESOURCE INFORMATION

Regulatory Reference: 30 CFR 784.22; R645-301-623, -301-724.

Analysis:

The Permittee provided information to describe the procedures to collect geologic, information of the area. .

Findings:

The information provided by the Permittee meets the minimum requirements of the Environmental Resource Information – Geologic Resources Information section of the regulations.

MAPS, PLANS, AND CROSS SECTIONS OF RESOURCE INFORMATION

Regulatory Reference: 30 CFR 783.24, 783.25; R645-301-323, -301-411, -301-521, -301-622, -301-722, -301-731.

Analysis:

Maps

Two maps were submitted which show the locations of the proposed boreholes.

Findings:

The information provided by the Permittee meets the minimum requirements of the Maps, Plans and Cross Sections of Resources Information section of the regulations.

Recommendation:

The amendment is recommended for approval.