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TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

March 10, 2011

TO: Internal File

THRU: April Abate, Hydrologist and Team Lead *COA 3-11-2011*

FROM: James Owen, Engineer. *JO*

RE: Construction of West Lease Portals, Canyon Fuel Company, LLC., Sufco Mine, C/041/002, Task #3739

SUMMARY:

On February 14, 2011, the Division of Oil Gas & Mining received an application for an amendment to the Mining and Reclamation Plan (MRP) of Canyon Fuel Company's Sufco Mine. The amendment was submitted for approval to construct two new concrete tunnels to access the West Lease Area of the mine.

Sufco is in the process of expanding mining operations into the West Lease Area. In order to access the area, Sufco permitted three new portals in 2010. Portals 1 and 3 were opened in late 2010. The applicant states that the determination was made that the grade coming out of two of the portals (1 and 2) would be too steep to allow access to the West Lease area from the upper yard area of Sufco's mine site. In order to access the new mining area, Sufco wants to permit and construct two concrete tunnels under the upper yard, opening in the current concrete tunnel storage area of the lower yard.

The contents and information provided are sufficient enough to meet the minimum requirements of the Utah Coal Mining Rules. However, the application was not submitted in a way that will allow for the MRP to be properly amended. **This application is recommended for conditional approval so that construction of the facilities can be initiated.** The division will expect to receive an appropriately prepared amendment application at the nearest possible date. This will consist of redline strikeout or replacement details in the form they will be amended in the MRP.

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TECHNICAL ANALYSIS:

OPERATION PLAN

MINING OPERATIONS AND FACILITIES

Regulatory Reference: 30 CFR 784.2, 784.11; R645-301-231, -301-526, -301-528.

Analysis:

A narrative description of the facilities was included within the cover letter of the application. The description includes the location details of the facilities as well as the construction details. The construction will require removal of some facilities. These facilities include the covered storage building, 3 shelves and the storage trailer in the upper yard, the concrete stoker coal storage bins and a drop in for the 10" mine yard drain system.

The two tunnels will be constructed from the lower mine yard under the upper yard. The tunnels will be approximately 280 and 300 feet in length. The tunnels will allow access to the mine and retain the upper yard. There will also be a concrete ventilation shaft constructed within one of the shafts approximately 10 feet below the surface to allow for additional ventilation of the mine.

A new retaining wall will be constructed surrounding the portals for the belt line and main haulage. The wall will replace the current stoker coal storage bins that are acting as a retaining wall between the upper and lower yards. The new wall will support the upper yard and the road leading to the yard. Details of the retaining wall were included in the corresponding drawing. Since the new portals will result in the loss of three concrete storage bins, a new bin will be built adjacent to the current sand and salt bin.

Findings:

Contents and information provided are sufficient enough to meet the minimum requirements of this section of the Utah Coal Mining Rules. However, the application was not submitted in a way that will allow for the MRP to be properly amended. The following deficiencies were identified:

- **R-645-301.526** - The applicant must include a complete description/narrative of the tunnels and associated facilities within the engineering section of the MRP text. The narrative must explain the construction, modification, use, maintenance and removal details of the tunnels and associated facilities. Also, the MRP text should be changed/modified/updated in terms of facilities that are to be removed.

- **R-645-301.528** - The applicant must include a complete description/narrative of the new coal storage bin within the engineering section of the MRP text. The narrative must explain the construction, modification, use, maintenance and removal details of the new coal storage bin.

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:

The application included two maps depicting the details of the proposed new coal storage bin and the construction details for the tunnels and the associated facilities. Plan and cross section views were presented, including all dimensions, measurements, details, etc. The maps were properly certified.

Findings:

Contents and information provided are not sufficient enough to meet the minimum requirements of this section of the Utah Coal Mining Rules.

MINE OPENINGS

Regulatory Reference: 30 CFR Sec. 817.13, 817.14, 817.15; R645-301-513, -301-529, -301-551, -301-631, -301-748, -301-765, -301-748.

Analysis:

The amendment includes details for the construction of two tunnels and a ventilation shaft that will be used to access underground workings.

Findings:

Contents and information provided are sufficient enough to meet the minimum requirements of this section of the Utah Coal Mining Rules. However, the application was not submitted in a way that will allow for the MRP to be properly amended. The following deficiency was identified:

- **R-645-301.551** - The applicant must modify the appropriate section of the MRP text to include a commitment to seal and backfill the new tunnels and ventilation shaft according to R-645-301.551.

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RECOMMENDATIONS:

The contents and information provided are sufficient enough to meet the minimum requirements of the Utah Coal Mining Rules. However, the application was not submitted in a way that will allow for the MRP to be properly amended. **This application is recommended for conditional approval so that construction of the facilities can be initiated.** The division will expect to receive an appropriately prepared amendment application at the nearest possible date. This will consist of redline strikeout or replacement details in the form they will be amended in the MRP.

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