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TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

March 30, 2011

TO: Internal File

THRU: April Abate, Hydrologist and Team Lead *aaa*
3-30-2011

FROM: James Owen, Engineer. *jeo*

RE: Construction of West Lease Portals, Canyon Fuel Company, LLC., Sufco Mine, C/041/002, Task #3780

SUMMARY:

On March 22, 2011, the Division of Oil Gas & Mining received a response to deficiencies identified in 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.

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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 a new appendix (5-10) in the amendment, along with the corresponding map. 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.

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 and are included in Appendix 5-10.

Findings:

Contents and information provided are sufficient enough to meet the minimum requirements of this section of the Utah Coal Mining Rules.

RECOMMENDATIONS:

The application is recommended for approval.