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# TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

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November 1, 2011

TO: Internal File

THRU: April Abate, Hydrologist and Team Lead *AAA 11-8-2011*

FROM: James Owen, Engineer *JO*

RE: West Lease Bore Holes, Canyon Fuel Company, LLC, Sufco Mine, C/041/0002, Task #3942

## SUMMARY:

On October 24, 2011, the Utah Division of Oil Gas & Mining received an application for an amendment to the Mining & Reclamation Plan (MRP) of Canyon Fuel Company's Sufco Mine. The application seeks approval to conduct drilling activities for 4 bore holes to collect data from a sealed part of the West Lease area of the mine.

This memo addresses the application's compliance with the engineering (R645-301-500) and bonding (R645-301-800) sections of the Utah Coal Mining Rules.

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**TECHNICAL ANALYSIS:**

**RECLAMATION PLAN**

**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 mine anticipates that 4" steel casing will be left in each of the holes. A cement collar will be placed around the casing at the surface and a lockable cap will be installed.

**Findings:**

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

**BONDING AND INSURANCE REQUIREMENTS**

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

**Analysis:**

Bonding calculations will not be affected due to earthwork associated with the drilling procedure. Earth excavation for the drill sites will be minimal using hand tools only. The applicant states that minor leveling for placement of wood crib blocking of the heliportable drill platform may be required. The Division has determined that no demolition will be required as the pad is portable and no cement pads are required. Upon drill site reclamation all waterlines, tanks, and pumps will be removed. None are considered permanent fixtures or require demolition.

Reclamation of drill sties will be done promptly after removal of equipment utilizing the mine's approved reclamation seed mixture. Sufco's current bond is sufficient to accommodate the drilling activities. A total estimated reclamation cost of \$234.06 has been estimated based on current unit costs for labor and per acre reclamation. The amount is considered minimal and does not classify as a significant enough increase to warrant increase in bond or a more detailed bond evaluation. Sufco currently has excess bond posted.

**Findings:**

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

**RECOMMENDATIONS:**

Approval is recommended.

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