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State of Utah

DEPARTMENT OF NATURAL RESOURCES

MICHAEL R. STYLER
Executive Director

Division of Oil, Gas and Mining

JOHN R. BAZA
Division Director

June 20, 2014

Ken May, General Manager
Canyon Fuel Company, LLC
597 South SR24
Salina, Utah 84654

Subject: Undermining of Shelters, Canyon Fuel Company, LLC, Sufco Mine, C/041/0002,
Task ID #4601

Dear Mr. May:

The Division has reviewed your application at the Sufco Mine. The Division has identified deficiencies that must be addressed before final approval can be granted. The deficiencies are listed as an attachment to this letter.

The deficiencies authors are identified so that your staff can communicate directly with that individual should questions arise. The plans as submitted are denied. Please resubmit the entire application.

If you have any questions, please call me at (801) 538-5325.

Sincerely,

Daron R. Haddock
Coal Program Manager

DRH/sqs
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Technical Analysis and Findings

Utah Coal Regulatory Program

PID: C0410002
TaskID: 4601
Mine Name: SUFCO MINE
Title: UNDERMINING OF SHELTERS

Environmental Resource Information

Historic and Archeological Resource Information

Deficiencies Details:

The Forest Service with the concurrence of The State Historic Preservation Office (SHPO) noted in their determination of significance and effect that mining under the shelters would have an adverse effect on the sites.

The Division's review of the drawing to be included in Appendix 4-2 has noted that the angle of draw when properly located will include shelter # 4SV3550 as such a mitigation plan for the shelter will be required by The Division, The Forest Service and The State Historic Preservation Office (SHPO).

jhelfric

Operation Plan

Subsidence Control Plan Subsidence

Deficiencies Details:

R645-301.525.541. The Division does not disagree with the surface subsidence analysis provided. Based on the calculated safety factor and supporting analysis, the Division can agree that the expected surface effects at the sites will be minimal or none. However minimal the expected effects are, there is still a possibility that the sites fall within the influence area based on the regulatory definition of angle of draw. R645-301.525.541 clearly defines the angle of draw as being determined by projecting to the surface from the outermost boundary of any mine workings. All entries, adits, head and tail gate roads, etc are considered mine workings. Therefore, the angle of draw must be drawn based on the definitions in Utah State regulations. The "angle of draw" line on the map must be adjusted and plotted according to the regulatory definition. The subsidence analysis provides justification that the effects will most likely be minimal or none, but it does not allow the operator to change the definition of angle of draw as it relates to collapsed longwall workings or the outermost boundary of any underground working extents.

jowen