



State of Utah
DEPARTMENT OF NATURAL RESOURCES
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Technical Analysis and Findings

Utah Coal Regulatory Program

July 6, 2015

PID: C0410002
TaskID: 4898
Mine Name: SUFCO MINE
Title: MIDTERM COMPLETION RESPONSE (BOND)

Reclamation Plan

Bonding Determination of Amount

Analysis:

The Division reviewed the Permittee's application to update the bond line items to 2014 Dollars during the midterm review, R645-301-830.410. The application meets the minimum standards or R645-301-800 detailing mining operations within the bonding sheets. The Sufco Mine bond will be increased \$1,070,000 to a new total of \$3,944,000 in 2019 Dollars

There are four sheets (Belt Deicer tank, Covered Storage, Pulley racks, and Substation upper) where to total has been dropped to zero dollars in 2011, under task 3780. These areas are still located within the Disturbance area, but the buildings and foundations have since been removed. The earthwork associated with reseeding the area remains within the Earthwork sheet. Once items have been construction and an area on the site has been disturbed, said line items may only be removed from the bond with either a formal bond release or a bond adjustment at the time of an amendment. It appears that indeed under Task 3780 sufco did ask for the these sheets to be removed, however, the Division engineer at the time failed to do any documentation. To meet the R645-301-830.410 and-880.200 rules to protect the State of Utah's surety areas that have been disturbed must go through an inspection before being removed from the bond calculations. The Division could not locate any formal inspections detailing the extent of the removal. The Division and Permittee will set up a meeting to discuss how to go about doing a minor inspection to release these buildings to remove them from the bonding details. This amendment will not be affected by this protocol and meets the minimum R645-301 rules and is recommended for approval.

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