



State of Utah
 DEPARTMENT OF NATURAL RESOURCES
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Technical Analysis and Findings

Utah Coal Regulatory Program

November 30, 2015

PID: C0410002
TaskID: 5026
Mine Name: SUFCO MINE
Title: SITLA LEASE MOD & BLM ROW ADDITION

Summary

On 6/24/15, Canyon Fuel Company submitted an amendment to incorporate new land into the existing permit area. The amendment was found deficient in regards to meeting regulations governing cultural resources. A deficiency letter was sent to the operator on 8/13/15. That process was associated with Task 4944. On 9/1/15 the Division received a revised application but it was still found deficient and returned. That process was associated with task 4973. On 11/12/15, a third amendment was submitted that addressed deficiencies noted in task 4973. The following is a technical analysis of the revised amendment in respect to the previous deficiencies and is associated with Task 5026.

The permittee proposes to incorporate new property (approximately 70 acres of BLM ROW and 420 acres SITLA for mining) into the existing permit area. The BLM land is leased under UTU-91108 and the SITLA land is lease under ML-49443-OBA. Additional surface disturbance is not expected as all work is to be conducted and accessed from existing underground workings.

The ROW indicates the property will be used to create an underground right-of-way for access from existing mine workings to coal reserves in the SITLA tract. There is no planned entry closure or surface subsidence expected. The property under the SITLA lease will be used for room & pillar mining to facilitate maximum extraction of the coal in adjacent leased areas. Subsidence is not anticipated.

Deficiencies Details:

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Environmental Resource Information

Historic and Archeological Resource Information

Analysis:

The amendment meets the State of Utah R645-301-411.140 requirements for cultural resource information.
 Plate 5-10Cv4 indicates two known cultural resource sites exist within the proposed lease modification area.
 Page 4-11 of the MRP references Appendix 4-2 for cultural and historic resource information on the Muddy Creek Coal Tract Area. As noted, 34 sites were documented during an evaluation by Cirrus Ecological Solutions, LC as part of

Manti-LaSal project number ML-02-1033. Site reconnaissance was made by the USFS archeologist on 9/22/15 to confirm conditions and subsequently requested SHPO concurrence on findings. SHPO concurred that 42SV2584 is eligible for listing and 42SV2596 is not eligible. However, there will be no effect to either site because there are no surface facilities or underground disturbance proposed to the sites. As noted in Plate 5-7, the sites are well outside projected mining areas. Therefore, as recommended by USFS and concurred by SHPO, there will be no historic properties affected by the project. As noted on page 4-11, should the mine plan change whereas site 42SV2584 has the potential to be impacted, SUFCO commits to coordinating with DOGM and USFS to determine appropriate monitoring and/or mitigation.

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