



INTEROFFICE MEMORANDUM

TO: Brock Bowles

FROM: Clayton Wein

DATE: 3/3/2023

SUBJECT: New Elk Mine PR-6 Review of Adequacy Responses to the Subsidence Monitoring Plan for the Blue Seam

Hi Brock,

As requested, I have reviewed the New Elk Mine's PR-6 adequacy responses with regard to the sections addressing the Subsidence Monitoring Plan for the Blue Seam. After reviewing the submitted materials, I have the following adequacy questions/concerns:

Rule 2.05.6(6) –

1. The applicant did not provide the Division with any new information regarding the subsidence section of the permit (Rule 2.05.6(6)). There was no update to the subsidence information about mining in the Blue Seam. The applicant needs to provide the Division with an evaluation specifically addressing the mining of the Blue Seam in the proposed PR-6 mining area. Exhibit 24 of the current permit was evaluated for multi-seam mining and retreat mining methods. The applicant is currently proposing room and pillar mining with no retreat mining. The subsidence evaluation should be based on the proposed mining methods.
2. Information provided in Exhibit 8(5) is insufficient. Minimal details were given in section 6, Subsidence Predictions, regarding mining in the Blue Seam. Section 6 of this document bases its claims off of Exhibit 24, which is insufficient for the proposed PR-6 mining area. The applicant should base this section off of information obtained for a PR-6 Blue Seam subsidence evaluation. The applicant should include details in section 6 in detail to support the claims about the predictions of the potential impacts of subsidence.
3. Subsidence monitoring, and control plans for the PR-6 mining area will need to be based off of a subsidence evaluation created for the Blue Seam.

Please feel free to contact me if you have any questions or concerns.

Sincerely,
Clayton

