

OFFICE OF SURFACE MINING

2006 Annual Evaluation Summary Report

for the Regulatory and Abandoned Mine Land Programs

Administered by the State of

ILLINOIS

Prepared by:
Alton Field Division
Indianapolis Area Office
Office of Surface Mining

August 21, 2006

Table of Contents

I.	Executive Summary	ii
II.	Introduction.....	5
III.	Overview of Coal Mining Industry.....	5
IV.	Overview of Public Participation in the Program.....	7
V.	Major Accomplishments/Issues/Innovations	8
VI.	Success in Achieving the Purposes of SMCRA.....	14
	A. Off-site Impacts.....	14
	B. Reclamation Success	15
	C. Customer Service	19
VII.	OSM Assistance	19
VIII.	General Oversight Topic Reviews	20
Appendix A:	Tabular Summary of Core Data to Characterize the Program	24
Appendix B:	State Comments on the Report	25

Cover page is a photo of the Peabody, Randolph Preparation Plant

August 21, 2006

I. **Executive Summary**

During the 2006 Evaluation Year (EY), the Office of Surface Mining (OSM), Indianapolis Area Office (IAO), conducted oversight evaluations of the Illinois Department of Natural Resources, Office of Mines and Minerals (OMM), Regulatory and Abandoned Mined Land (AML) Programs, administered by the Land Reclamation Division (LRD) and Abandoned Mined Land Reclamation Division (AMLRD) respectively. Oversight activities focused on the success of the agency in meeting Surface Mining Control and Reclamation Act (SMCRA) goals for environmental protection, and prompt, effective reclamation of land mined for coal. A Performance Agreement (evaluation plan) for each program was cooperatively developed by the IAO and the State tailoring oversight activities to the unique conditions of each State program. The purpose of these oversight activities was to identify any need for program assistance to the State to strengthen its programs.

In support of OSM's national initiatives, studies were conducted in the Title V areas of off-site impacts, reclamation success (bond release), and customer service.

- The IAO off-site impact study indicated that 90 percent of Illinois' inspectable units were free from off-site impacts. The IAO observed 5 off-site impacts relating to encroachment and hydrology. Four of these 5 impacts were minor in degree, and 1 was moderate. The IAO concludes from this evaluation that the LRD administered its Regulatory Program in EY 2006 to effectively protect the public and the environment from adverse impacts caused by surface coal mine operations.
- The IAO conducted eight site visits at seven permanent program surface mines and evaluated 4463.8 phase I acres, 4249.8 phase II acres and 3543.9 phase III acres that the LRD recommended for bond release. The IAO agreed with the LRD that these acres met the reclamation requirements to be eligible for release of bond except for three acres at one mine. Therefore, the IAO concludes that the State program is ensuring successful reclamation on lands affected by surface coal mining operations.
- The IAO's customer service evaluation concerned the effectiveness of customer service provided by the LRD relative to its permitting process. The evaluation focused on public availability of permit applications for public inspection at the county seat of each county containing land to be affected under the permit. Based on the results of this review, the IAO concluded that the LRD is effectively providing customer service so the public may inspect permit applications at county courthouses.

One general oversight topic review was conducted during EY 2006 for the State Regulatory Program.

- The IAO selected 35 inspectable units for complete inspections to evaluate LRD effectiveness in protecting the public and the environment from off-site impacts and other on-the-ground problems resulting from surface coal mining and reclamation operations. These inspections were intended to identify the cause and degree of off-site impacts and to direct efforts toward decreasing their occurrence. The IAO performed

33 of the selected number, the results of which indicated that the LRD administers an effective program meeting SMCRA requirements.

The EY 2006 Illinois AML Performance Agreement included three topics for evaluation.

- The IAO conducted an evaluation of completed AML emergency projects. The purpose of this routine oversight activity was to evaluate: (1) the success of completed, federally funded emergency reclamation projects, including the AML Program's National Environmental Policy Act (NEPA) compliance procedures and other emergency program requirements. IAO findings led to the conclusion that the potential for the long-term success of emergency reclamation done by the Illinois Program is very good. Environmental compliance responsibilities were met. The Illinois AML Emergency Program is deemed successful.
- The IAO and the AMLRD mutually determined to include an evaluation of the State's water monitoring program in their EY 2006 Performance Agreement. Recent AMLRD and OSM studies relating to acid mine drainage (AMD) brought to the forefront a growing awareness of the need to enhance water monitoring practices. The AMLRD has already taken significant steps in this direction, yet further steps remain to be taken. Thus, the AMLRD and OSM conducted a cooperative Enhancement and Performance Review to assess current procedures to further refine the program. The IAO and AMLRD findings resulted in several recommendations for enhancement of current water monitoring practices.
- The IAO conducted an evaluation on accuracy of data entered into the Abandoned Mine Land Inventory System (AMLIS). OSM's Directive AML-1 establishes the policies, procedures and responsibilities for maintenance of the AML Inventory and the AMLRD is responsible for implementing procedures consistent with the Directive AML-1 to maintain the AML inventory. IAO findings concluded that the AMLRD's process in ensuring data accuracy is highly successful.

In addition to national initiatives, and topical reviews, the IAO engaged in a number of assistance activities during the review period. The primary mode of OSM assistance to Illinois is through grant funding. Illinois was awarded \$2.37 million in EY 2006, providing 50 percent support for its Regulatory Program. OSM provides 100 percent funding for the Illinois AML Program, which totaled \$8.57 million in EY 2006.

OSM provides ongoing technical assistance to State and Tribal programs. One way is by offering a wide range of technical training courses throughout the year. In EY 2006, several individuals from Illinois' Regulatory and AML Programs attended some of these training courses. Another way is through the Technical Information Processing System and its workstations and software OSM provides for State use in permit processing and engineering evaluations. Still another way is in responding to assistance requests concerning specific matters.

In EY 2006, OSM provided requested assistance to Illinois AML by performing a Global Positioning System (GPS) Survey to locate subsidence related to an abandoned underground mine near Valmeyer, IL. Assistance was provided to the Illinois AML program through hands on training in the use of Real Time Kinematics GPS survey techniques to accurately locate the subsidence holes.

During the EY, OSM provided assistance to Illinois AML with a survey project and the comparison of three different GPS units.

OSM continued assistance in the ongoing investigation of AMD discharges at the Tab-Simco AML project in Jackson County. The continuation of this project involves additional reclamation to eliminate hazards associated with dangerous highwalls and AMD discharge abatement. OSM will continue to assist Illinois in field water measurements and sampling of the mine pool and AMD.

In EY 2006, OSM continued to provide assistance to the Illinois AML program regarding water-quality monitoring in efforts aimed at measuring and enhancing reclamation success.

II. Introduction

The Surface Mining Control and Reclamation Act of 1977 created the Office of Surface Mining Reclamation and Enforcement in the Department of the Interior. SMCRA provides authority to OSM to oversee the implementation of, and provide Federal funding for, State Regulatory and Abandoned Mine Land Reclamation Programs approved by OSM as meeting the standards specified in SMCRA. This report contains summary information regarding the Illinois program and its effectiveness in meeting the applicable purposes of SMCRA as specified in section 102. This report covers the period of July 1, 2005, to June 30, 2006. Detailed background information and comprehensive reports for the program elements evaluated during the period are available for review and copying at the Indianapolis Area Office of the OSM.

The following acronyms appear in this report:

ACSI.....Appalachian Clean Streams Initiative
 AMD.....Acid Mine Drainage
 AML.....Abandoned Mine Land
 AMLIS..... Abandoned Mine Lands Information System
 AMLRD..... Abandoned Mined Land Reclamation Division
 AOC.....Approximate Original Contour
 EYEvaluation Year
 FY.....Fiscal Year
 GIS..... ..Geographic Information System
 GPS.....Global Positioning System
 IAO.....Indianapolis Area Office of the OSM
 IG.....Inspector General
 LRD.....Land Reclamation Division
 MSHA.....Mine Safety and Health Administration
 NEPA.....National Environmental Policy Act
 NOV.....Notice-of-Violation
 OMM.....Office of Mines and Minerals
 OSM.....U. S. Department of the Interior, Office of Surface Mining
 PAD.....Problem Area Description
 SMCRA.....Surface Mining Control and Reclamation Act of 1977, PL 95-87

III. Overview of the Illinois Coal Mining Industry

Coal Resources

Coal underlies 60 to 70 percent of the State of Illinois' 37,000 square miles of land area (see map to the right) and is part of a geologic structure known as the Illinois Coal Basin. The Illinois Basin also extends into western Kentucky, and southwestern Indiana. Illinois possesses a rich and abundant coal resource, in the Pennsylvania



August 21, 2006

bedrock usually between 200 and 900 feet below ground, and is found in layers, or seams, 4 to 8 feet thick. Most of the coal production in Illinois comes from two of these coal seams, referred to as the #5 and #6 seams. This resource has yielded several billion tons of coal since mining began in Illinois. The recoverable coal reserve remaining in Illinois is estimated to be about 38 billion tons. This reserve accounts for almost one-eighth of the total U.S. coal reserves and one-quarter of the nation's bituminous coal reserves. Most of the coal in Illinois is bituminous, with high-energy values.

Illinois Coal Values

Value	High	Low
Moisture Content	20%	5%
Heating Value in BTU	15,000	11,000
Ash Content	14%	6%
Sulphur Content	7%	0.5%

Historical Highlights

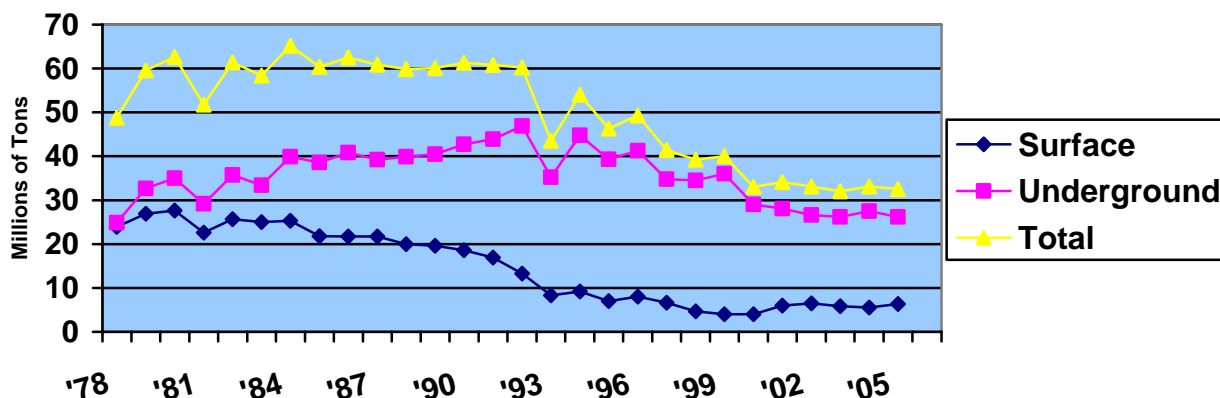
The first discovery of coal in North America was in Illinois by French explorers, Marquette and Joliet, in 1673, who observed coal outcroppings along the Illinois River. However, it was not until the early 1800's that settlers began to mine outcropped coal for domestic use. Coal mining became more extensive, and in about 1848 the first underground mining operation took place in Belleville, Illinois. With the advent of the Illinois Central Railroad in the 1850's, coal production greatly increased as larger markets had become available. With the Civil War, Illinois railroads grew tremendously, and coal mining in Southern Illinois grew rapidly as well. Since that time, coal mining and its indirect economic effects have been a major component of the Illinois economy.

Coal Production and Usage

Illinois has historically been one of the larger coal producing states in the nation, and was ranked ninth largest producer of coal in the United States in 2004. The graph on page 7 depicts coal production in recent years, showing a general decline since the mid-eighties. In the past three years, coal production has been between 32 million to 34 million tons per year (see Appendix A, Table 1), representing the lowest level of production in the last seventy years.

Historically, the vast majority of Illinois coal production has been from underground mines. In 1995, approximately 85 percent of Illinois' coal production was from underground mines; in 2000, 88 percent; and in 2005, 81 percent. According to a recent National Mining Association's survey of major U.S. mines, one of Illinois' underground mines was among the country's major producing coal mines.

Illinois Coal Production Per Year 1978 - 2005



Illinois is one of the leading energy producers in the United States. More than 84 percent of Illinois coal production is purchased by the electric utility industry. Industrial, residential, and commercial users account for the remaining 16 percent. Roughly 79 percent of Illinois coal is sold to out-of-state utilities. Illinois utilities used 6.8 million tons of Illinois coal in 2004. Because Illinois coal is relatively high in sulfur, most of the electric utilities burn a combination of local and lower sulfur out-of-state coal to meet the requirements of the national Clean Air Act.

IV. Overview of the Public Participation Opportunities in the Oversight Process and the State Program

IAO Oversight Outreach and Public Participation Activities

During EY 2006, the IAO continued the use of the OSM tracking system which helps facilitate the public participation process. This method provides a systematic means of tracking all citizen interactions to ensure timely follow up, both with citizens and with OSM itself. The IAO also continues to use its citizen complaint guide, a 5 ½ by 8 ½ inch card outlining information about how to report current or past coal mining problems.

Lands Unsuitable Petitions'

During EY 2006, the LRD received four citizen petitions requesting that certain lands be designated as unsuitable for mining. Two petitions were denied. A third petition was filed which is essentially a resubmission of the previously denied petition for a surface mining operation in northern Illinois. The fourth petition filed was duplicative of the previously rejected petition for an underground mine in central Illinois. At the end of the EY, these two petitions were pending acceptance or rejection by the LRD at both locations.

Illinois Department of Natural Resources, Office of Mines and Minerals Public Participation Activities

The OMM continues to make information available to the public concerning its Regulatory and AML Programs, as well as information to educate citizens of their rights in surface coal mining and reclamation matters. The OMM maintains a web site containing program related information, and makes available to the public the publications listed below. The OMM has for several years participated in a variety of events, including Earth Day programs, Conservation Fairs, Eco-Meets, Coal Awareness Day, teacher education workshops, and classroom presentations. In EY 2006 the OMM participated in 35 different events of which five were Summer Day Camps for grade school children. These events reached approximately 7000 people.

The OMM's educational materials include the "Mining, Minerals, and Reclamation Jeopardy" game and a Teacher Education packet, which provides a comprehensive list of resources available for teachers. In EY 2006, OMM personnel brought the State's mineral and rock exhibit trailer to the Indiana Coal Education Conference held in Terre Haute, Indiana. While many of the OMM educational programs are oriented toward school age children, several thousand people of all ages visit OMM's exhibits at the two annual Illinois State Fairs. Approximately 6000 kids participated in OMM's mineral dig at the two annual fairs this past year.

The OMM successfully implements the required public participation provisions of all aspects of its Regulatory and AML Programs. In addition to addressing the required provisions of public participation, Illinois has taken a pro-active position regarding outreach and the distribution of information to all stakeholders. Illinois continues to be pro-active in meeting controversial situations head on. It routinely conducts meetings and gathers public input when significant questions arise about a program area under its jurisdiction.

The following informational publications are available on the internet at www.dnr.state.il.us/mines/lrd, or from the OMM by phone, mail, or personal contact:

Abandoned Mined Land Pamphlet
Citizens Guide to Farmland Reclamation
Citizens Guide to Coal Mining Reclamation in Illinois
Planned Coal Mine Subsidence in Illinois

All of this is part of an overall strategy by the State directed toward better citizen understanding and involvement in the Regulatory and Abandoned Mine Land Programs.

V. Major Accomplishments/Issues/Innovations in the Illinois Program

The Illinois OMM maintained both its Regulatory and AML Programs in a manner that assures they meet national standards, and effectively protect citizens and the environment from adverse effects of pre-SMCRA coal mining practices, and from current surface coal

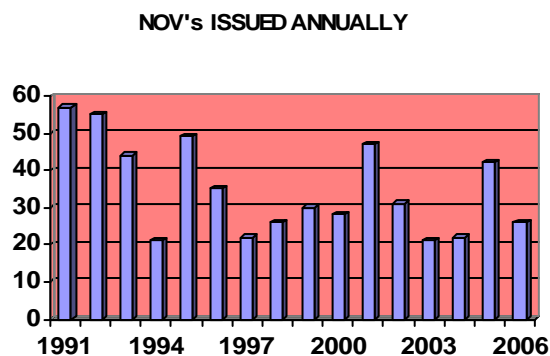
mining activities. Illinois also successfully maintains a cooperative agreement with OSM for administration of an approved State program on federally owned land.

Formal Amendment Processing

During this evaluation year, one Illinois final rule was published in the **Federal Register** relating to revegetation success standards.

Environmental Compliance

Illinois administers its program in a way that effectively protects citizens and the environment from adverse impacts resulting from surface coal mining activities. Since 1991, the State has ensured environmental compliance by coal mining operators as can be seen by the number of Notice-of-Violations (NOV) issued from 1991 through 2006.



Horizon Natural Resources Company Bankruptcy Issue

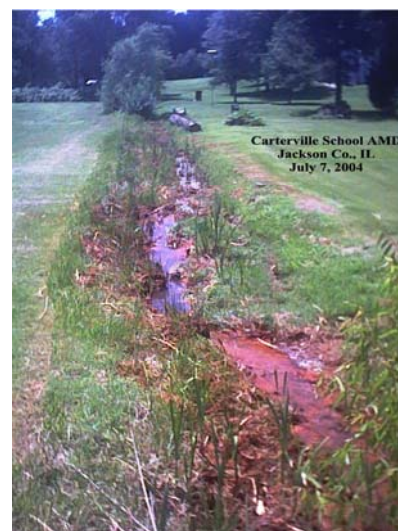
In EY 2006 the LRD continued in a cooperative effort to resolve the Horizon Natural Resources Company bankruptcy case. The Horizon Natural Resources Company and its subsidiaries, having approximately 400 permits in seven states and reclamation bonds on these permits of approximately \$365 million, filed for reorganization under Chapter 11 of the U.S. Bankruptcy Code in 2002. The restructuring and reclamation plan included 15 permits in Illinois involving 8 mining companies.

The current status of this issue resolution in Illinois is as follows: all Horizon permits have been released or transferred except three. The three permits remaining are currently in reclamation, with just under \$3.1 million worth of liability remaining on the permits.

Clean Streams Activities

New Initiatives:

A Watershed Cooperative Agreement award was granted to the Shawnee Illinois Resource Conservation & Development District on September 13, 2005, in the amount of \$38,604. The cooperative agreement funded development of acid mine drainage treatment wetlands at the Carterville, Illinois High School. The project will clean up AMD and provide an educational experience for the students.



Work began on the Delta North AML Clean Streams project in February 2006. This large surface mined area has mine refuse disposal areas throughout that are significant sources of AMD. Access has been constructed into one refuse disposal area and alkaline cement kiln dust is being delivered to the site at no cost to the AMLRD. The cement kiln dust will be placed in selected areas as a cap and alkaline addition. The second phase of this project will provide for spoil capping of the cement kiln dust and mine refuse.

On-Going Projects:

The Illinois AML Program continued to make progress during EY 2006 toward achieving Appalachian Clean Streams Initiative (ACSI) goals. At present, Clean Streams activities in Illinois are focused for the most part on the remediation of AMD within the Saline River watershed in southern Illinois. Clean Streams Initiative funds expended by the AMLRD during EY 2006, were for continuing reclamation work at the Palzo Mine Site and the Will Scarlet Site in Williamson County, and the Tab Simco Project in Jackson County.

- ❖ The Palzo surface coal mine operation extracted portions of the Davis and Dekovan coal seams until the 1960's, and left behind 312 acres of porous acid mine spoil. Over the years since mining operations ceased, numerous reclamation efforts have been undertaken by a variety of government agencies, including the AMLRD. The majority of the acid spoil has been graded and vegetated, however, there remained a portion of the site where rainfall infiltrates the porous acid mine spoil and re-emerges in the down gradient drainage ways and into Sugar Creek along the site's northern boundary as acid mine drainage. Sugar Creek is "non-supportive" of biotic life due largely to AMD from the Palzo site.



In October 2001, the AMLRD began a phase of reclamation at this site designed to enhance surface runoff, reduce infiltration, and add alkalinity to 60 acres of spoil. Southern Illinois Power and the Lafarge Corporation partnered with the AMLRD, paying nearly all the costs of providing alkaline by-products for this project. Much of the work on this project was completed in EY 2004, but it continued during EY 2006. Other project partners were the U. S. Forest Service, owner of the land, and the Illinois Environmental Protection Agency, through which Section 319 funding under the Federal Clean Water Act was provided.

Though the AMLRD does not expect this project to entirely eliminate AMD from the site, both surface and ground water quality is expected to significantly improve. Monitoring of wells, seeps, and surface flows will aid in determining success in this innovative approach to the restoration of this extremely acidic mine site.



Currently, 97 percent of the work on this project has been completed. The remaining work is a second application of fertilizers and some mowing. The current contract total is \$568,912.64.

- ❖ Work began at the Will Scarlet Site in June of 2004. Grading to establish proper drainage began in EY 2005. This large surface mined area consists of poorly drained ridge and valley acid forming materials. Significant acid seepage emerges down gradient of the mine spoils. Approximately 222,000 cubic yards of alkaline cement kiln dust has been placed on site and capped with soil material augmented by the incorporation of biosolids. This project was about 90 percent complete at the end of this evaluation year, and it is anticipated that the remainder of the site will be seeded in the fall of 2006.
- ❖ The Tab Simco Project reclamation began in June 2005. Currently this project is approximately 98 percent complete. The project consists of underground mine works intersected by surface mining. The underground workings serve as conduits for subsurface flow and acid mine drainage emerges in the surface mine spoils. Cement kiln dust has been incorporated into the spoil in selected areas. All areas were seeded in the late fall of 2005. Heavy winter rains have caused some erosion problems that will be repaired in late summer 2006.

Blanket Emergency Approvals

During the 2006 evaluation year, the Illinois AML Emergency Program operated under an agreement providing “blanket” emergency project approval for eligible pit subsidence projects. This agreement encompassed the OSM Indianapolis Area Office, the Illinois AML Program, and the governmental agencies of jurisdiction ensuring NEPA compliance.

This “blanket emergency declaration” is intended to streamline the processing of pit subsidence emergencies, the most common kind of emergency project in the State, for the

benefit to the State as well as OSM. During EY 2006, five pit subsidence projects were completed. These subsidence events impacted thousands of persons.

OSM National Reclamation Awards

Coal mine operators are encouraged to mine coal and reclaim the disturbed land responsibly. A positive environment exists between the regulators and the industry as demonstrated by the number of awards that Illinois operators have received. Since the inception of the OSM award program, the accomplishments of the following Illinois operators have been recognized:

<i>Year of Award</i>	<i>Company</i>	<i>Mine</i>
1987	Arch of Illinois	Captain
1992	Arch of Illinois	Denmark
1993	Peabody Coal Company	River King # 3
2001	Black Beauty Coal Company**	Illinois and Indiana Mines
2002	Consolidation Coal Company	Burning Star # 4
2002	Arch of Illinois	Captain and Denmark
2003	Consolidation Coal Company	Burning Star # 5
2004	Consolidation Coal Company	Various mines in Illinois
2005	Foundation Coal Holdings	Delta Mine

** OSM Directors Award

The Reclamation Award winners have been recognized for:

- The successful restoration of three major streams,
- Restoring a huge surface mine into a significant multiple land use State Park,
- Achieving exemplary agricultural post-mining land use through the re-creation of prime farmland,
- Reclaiming a 2,500 acre site to create varied aquatic environments, including deepwater lakes, shallow pools, potholes, marshes, nesting islands, and mud flat for waterfowl.
- Reclaiming 3,200 acres of land that previously contained wetlands and prime farmland. More than 148 acres were restored into wetlands and approximately 1,400 acres of cropland were reestablished, providing feeding areas for resident and migratory wildlife.
- With more than 30,000 permitted acres and the regulatory requirement to return the land to its previous productivity, Consolidation Coal Company developed a successful reclamation method in prime farmland conditions. Research showed

August 21, 2006

soil loosening was needed to eliminate compaction problems, and a special plow was developed. The 17-inch lifting motion fractures compacted soils and plows to depths of 48 inches, resulting in soils that consistently meet performance standards.

- Innovative reclamation at the Delta Mine resulted in a variety of topography, as well as land uses. The 3,800 acre area integrates cropland with forestry, lakes and wildlife habitat, providing viable, long-term land use for this rural Illinois community.



OSM National Abandoned Mine Land Reclamation Awards

Each year OSM honors, and recognizes the best examples of abandoned mine land reclamation in the nation. Award winners are recognized as leaders in the field of mine reclamation, set the standards of excellence for future reclamation projects, and help preserve and enhance the quality of American life. Previous Illinois AML award recipients are:

<i>Year of Award</i>	<i>AML Reclamation Project</i>
1992	Lead and Zinc Mine Site
1992	Pyramid Coal Company

The AML award recipients were recognized for:

- Their use of innovative reclamation techniques, which eliminated 25 abandoned underground lead and zinc mine entries and shafts, avoided the use of heavy equipment minimizing disturbance to the environment, and protected an historic area from excessive damage.
- The elimination of the source of acid water over a 3,000-acre area. The

consolidation, treating, and covering of acid waste materials eliminated the need for acid water treatment.

VI. Success in Achieving the Purposes of SMCRA as Determined by Measuring and Reporting End Results:

Performance standard based reviews, along with public participation evaluations provide the IAO with a broad picture of:

- The number and extent of observed off-site impacts;
- The number of acres that have been mined and reclaimed and which meet bond release requirements for the various phases of reclamation; and,
- The effectiveness of customer service provided by the State.

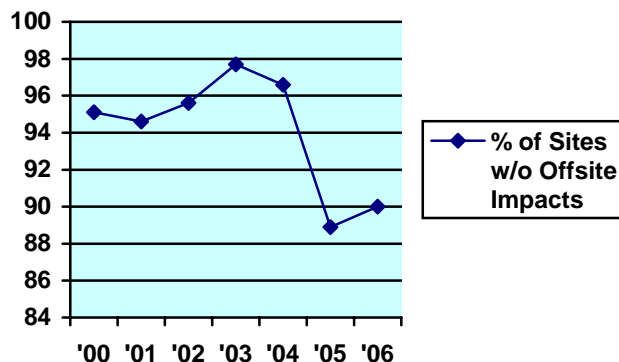
Individual topic reports, available in the IAO, provide a detailed analysis and information concerning how the evaluations were conducted and how the conclusions were reached.

A. Off-Site Impacts:

A primary focus of SMCRA is the protection of the public, property, and the environment from adverse effects of active coal mining operations. The goal, therefore, is that there be no impacts, or no greater than minimal impacts, outside the permit area. To accomplish this goal, State programs strive to continually decrease the occurrence of off-site impacts.

The IAO and LRD conducted a joint evaluation in EY 2006 to determine the effectiveness of the State program in protecting the public and the environment from off-site impacts caused by surface mining and reclamation operations. Conclusions were based on data from complete oversight inspections conducted by the IAO, along with data reported by the State.

The LRD inspected a total of 90 inspectable units in EY 2006 and found 14 off-site impacts on 9 of the inspectable units. Eighty-one of the 90 inspectable units (90%) were absent any off-site impacts. The 14 off-site impacts observed by the LRD in EY 2006, represent the same number but a higher percentage of sites free of off-site impacts than observed the previous year. It should be noted that, even though ideally the goal is not to have any incidents occur, the realistic goal in OSM's FY 2006, Annual Performance Plan is to



maintain the percentage of sites free of off-site impacts at 93 percent. The LRD observed 14 off-site impacts in EY 2006, 14 off-site impacts in EY 2005, six in EY 2004, three in EY 2003, seven in EY 2002, five in EY 2001, six in EY 2000, and nine in EY 1999.

The numbers of off-site impacts the LRD observed during the evaluation year were few. The observations were minor hydrologic and encroachment impacts on land and water resources.

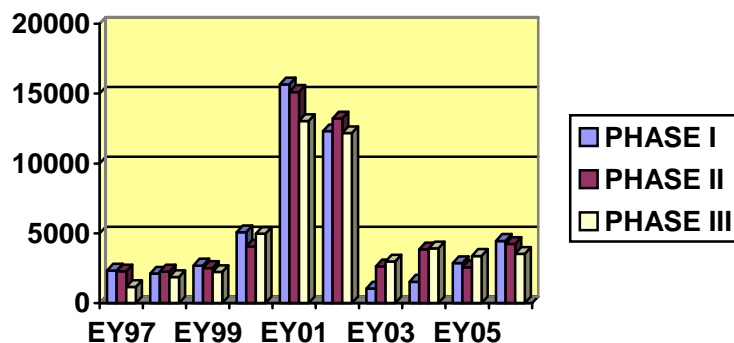
In EY 2006, the IAO observed 5 off-site impacts in the course of making complete inspections on 33 inspectable units. The IAO did not issue any Ten-Day Notices relating to these off-site impacts. Three violations observed by the IAO causing an off-site impact, had been previously addressed by the State. The IAO found that 94 percent of the inspectable units it inspected were free of off-site impacts. The IAO's data verified State reported information regarding the percent of impact-free inspectable units.

Total off-site impacts noted during the EY were 16 on 9 inspectable units due to duplication of observations by the IAO and LRD for some inspectable units. 90% of the inspectable units were free from any off-site impacts: a slight increase in impact-free units from last year. Hydrologic impacts accounted for 56% of all impacts. An analysis did not identify any trend or point to an underlying cause that the State might address. The IAO concludes from this evaluation that Illinois administered its Regulatory Program during EY 2006 in a way that effectively protected the public and the environment from adverse off-site impacts caused by surface coal mining operations.

B. Reclamation Success:

Thousands of acres of land affected by surface coal mining are successfully reclaimed each year as noted in Table 5 of this report. This data, summarizing the number of acres on which successful reclamation was achieved and for which bond was released in EY 2006, provides a baseline for a comparison with bonded acres existing at the beginning of the review period and the number of new acres bonded during the review period. This information serves as an indicator by which to evaluate how well reclamation is staying current with mining.

PREVIOUS 10 YEAR BOND RELEASES



Acres of Bond Released 1983 - 2006

EY Year	Phase I	Phase II	Phase III
1983-1986	0	0	0
1987	997	0	0
1988	1,172	84	84
1989	162	0	0
1990	1,137	18	18
1991	2,087	6	6
1992	91	194	172
1993	982	176	140
1994	587	932	683
1995	1,893	1,951	1,468
1996	2,813	3,257	2,132
1997	2,342	2,280	1,168
1998	2,135	2,279	1,877
1999	2,710	2,528	2,236
2000	5,098	4,058	4,976
2001	15,662	15,128	13,050
2002	12,313	13,218	12,172
2003*	1,065	2,652	3,001
2004	1,546	3,860	3,922
2005	2,882	2,580	3,391
2006	5,082	5,123	6,787
Totals	62,756	60,332	57,283

**EY2003 IS FOR A 9 MONTH PERIOD (OCTOBER 1, 2002 – JUNE 30, 2003)*

The IAO conducted eight site visits at seven permanent program surface mines and evaluated 4463.8 phase I acres, 4249.8 phase II acres and 3543.9 phase III acres that the LRD recommended bond release on. The IAO agreed with the LRD that these acres met the reclamation requirements to be eligible for release of bond except for three phase II acres at one mine. The LRD agreed to withhold recommendation for release of phase II bond on these acres. Therefore, the IAO concludes that the State program is ensuring successful reclamation on lands affected by surface coal mining operations.

Specifically, the following elements were evaluated for successful reclamation:

Land Form/Approximate Original Contour and Soil Replacement

The criterion for determining whether reclaimed lands are reconstructed appropriately is whether it has been returned to its approximate original contour (AOC), including soil replacement. For the purposes of this evaluation Phase I bond releases were used as the indicator that the AOC had been achieved and soils had been replaced. For the evaluation period, approximate premining contour, including soil replacement, was achieved on 5,082 acres. To date approximately 62,756 acres have met the criteria for, and have been granted, Phase I bond release.

August 21, 2006

Surface Stability and Establishment of Vegetation

For the purposes of this evaluation, surface stability and the establishment of vegetation were measured by the acres of Phase II bond released. For EY 2006, Illinois was successful in achieving surface stability and in establishing vegetation on 5,123 acres.

Based on the IAO analysis of data supplied by the LRD, between 1983 and June 2006, approximately 60,332 acres of mined land have met the criteria for Phase II bond release.

Establishment of Post Mining Land Use and Productivity Restoration

Post mining land use was achieved by establishing successful and appropriate vegetative cover. This includes restoring productivity, where appropriate. The IAO measured this element of reclamation success by the number of acres receiving Phase III bond release. For the evaluation period, 6,787 acres had Phase III bond released.

Based upon the IAO analysis of data supplied by the LRD, between 1983 and June 2006, 57,283 acres have been fully reclaimed and the post mining land use and appropriate vegetative cover achieved, including restoration of productivity where appropriate.

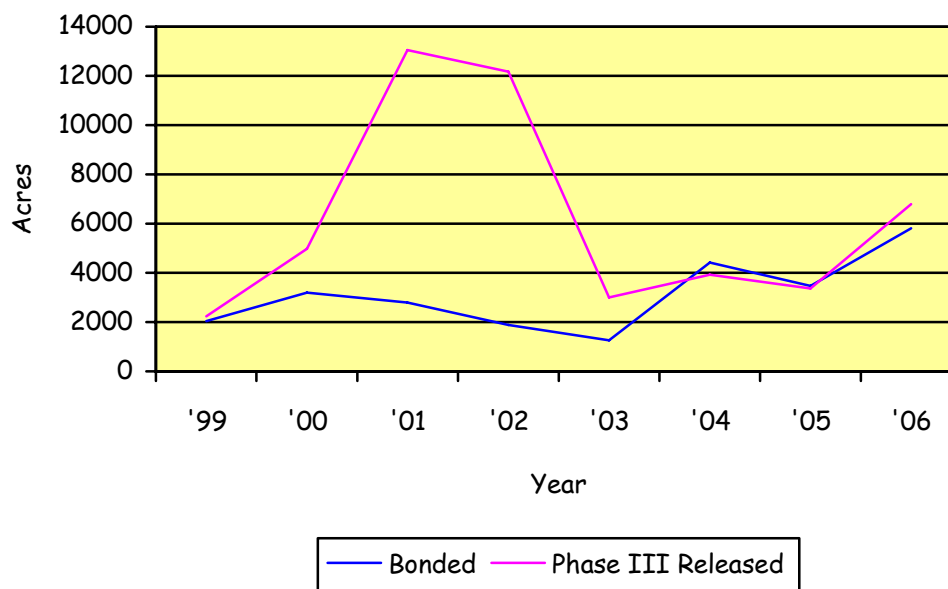
Hydrologic Reclamation

The successful restoration of surface and groundwater quality and quantity was measured by the accounting of acres of Phase III bond release achieved. Illinois released 6,787 acres for Phase III during the evaluation period and a total of 57,283 acres since 1983.

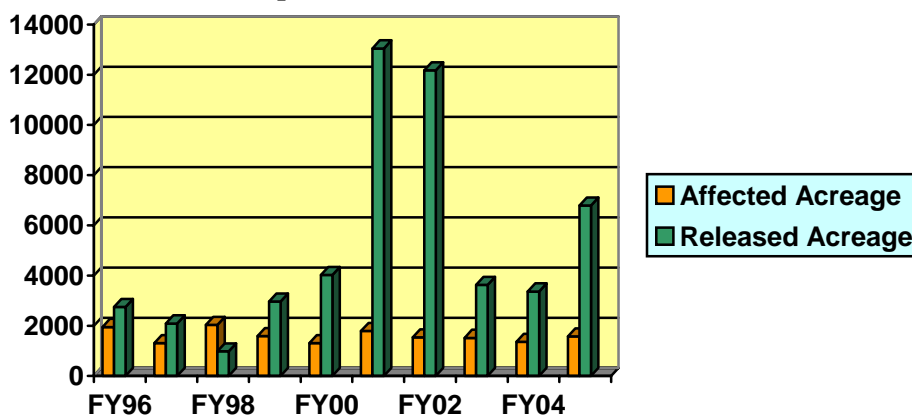
Contemporaneous Reclamation

The OSM Directive, REG-8 defines contemporaneous reclamation to be the difference in time between when lands are disturbed and when they achieve phased bond release. There has been considerable discussion about whether this is a valid measure of contemporaneous reclamation. This discussion has taken place both within OSM and with the various State regulatory authorities. The results shown in the chart and table below represent the best effort under REG-8 at assessing contemporaneous reclamation.

Annual Bonded Acres/Phase III Released



A general picture of how successfully reclamation is staying current with mining was made by the IAO by comparing the number of acres affected to the number of acres on which phase III bond was released by the LRD during the five State fiscal years 2001 through 2005. For measurement of contemporaneous reclamation, the LRD provided IAO data showing that 7,611.5 acres were affected, and 30,808.2 acres were phase III released during that period. More than four times as many acres were released as were affected during this period which may be an indication of contemporaneous reclamation.

Illinois Contemporaneous Reclamation (IL FY)

Another method the IAO used to measure contemporaneous reclamation was to access the OSM Inspection and Enforcement System to determine the number of violations pertaining to contemporaneous reclamation identified during IAO complete mine site evaluations during EY 2006. Perhaps a more accurate indicator that reclamation is staying current with mining is that IAO found only two mines in violation of the requirement for contemporaneous reclamation while making complete mine site evaluations in EY 2006.

C. Customer Service:

The customer service evaluation identified in the EY 2006 Performance Agreement between the IAO and the LRD pertained to public access to permit applications.

The purpose of this evaluation was to determine the effectiveness of customer service provided by the State in assuring that documents relating to the permitting process are available to the public for review. For the purposes of this evaluation as stated in section 2.04 Notice and Public Review of Applications of the Illinois Surface Coal Mining Land Conservation and Reclamation Act, specifically, (a)(2) “file the application for public inspection at the county seat of each county containing land to be affected under the permit. Information which pertains to coal seams, test borings, core samplings, or soil samples required to be part of a permit application shall be made available to any person with an interest which is or may be adversely affected.” The IAO evaluated the existence and observed the readily availability of the documentation. Note that the availability is not a reflection on the State’s performance but only an observation for citizen accessibility.

Based on this evaluation, the IAO concluded that the LRD is effectively providing customer service by ensuring that a full copy of a permit application is filed with the clerk at the courthouse of the county where the mining is proposed to occur, affording public opportunity to inspect, copy, and comment on a permit application. The LRD has taken all reasonable measures in fulfilling its responsibility to implement this public participation requirement of the program. The LRD is not responsible for permit documents after they are filed by the county clerk.

VII. OSM Assistance

The primary mode of OSM assistance to Illinois is through grant funding. The amount of grant funding awarded to Illinois for the operation of the Regulatory Program in EY 2006 was \$2.37 million. OSM provided 50% of the total funding necessary for Regulatory Program operation. OSM provided 100% funding for the Abandoned Mine Land Program in Illinois, which totaled \$8.57 million in EY 2006. Over the previous four years, OSM has awarded grants to Illinois totaling \$10.67 million for Regulatory Grants and \$37.60

million for the AML Grants. The following table contains the grant amounts for each of these four years. Note: Grant cycles start in July and go to June.

***Grants Awarded in Illinois
(Dollars are in Millions)***

<i>Year</i>	<i>Regulatory Grant Amount</i>	<i>AML Grant Amount</i>
2005	\$2.37	\$8.57
2004	\$2.44	\$9.07
2003	\$2.98	\$9.87
2002	\$2.88	\$10.09

Additionally, assistance is provided as outlined below:

- Technical training courses are offered by OSM throughout the year, which address technical and programmatic aspects of mining and reclamation. These courses are provided for OSM and State participants as well as industry and others on a space available basis.
- OSM provides the Technical Information Processing System including local workstations and software for State use. The OSM also provides training and support. Illinois uses the system for a variety of tasks related to permit application processing and other technical or engineering evaluations. The technical staff continues to work with the State to develop and implement an electronic permitting program.
- Informal discussions occur between OSM and State management and staff that result in a good working relationship. Informal assistance is provided regarding field or implementation issues on a continual basis.
- Illinois requested technical assistance with design of a remediation plan for the Tab-Simco AML project. The project involves the discharge of high acidity water from a shallow coal seam that underlies a residential neighborhood at a depth of 20 to 25 feet. OSM staff assisted in evaluating a water sampling plan and conducted a site investigation in 2003, and did further field investigations to identify the location of boreholes, to collect water samples and to continue discussion of proposed remediation work in 2004-2005. OSM technical assistance continued during EY 2006.

VIII. General Oversight Topic Reviews

In addition to the off-site impact and land restoration reviews, OSM conducted oversight activities in the program areas listed below. Copies of oversight documents relating to these topics may be obtained at the IAO office or by requesting specific reports by mail at the following address:

August 21, 2006

Office of Surface Mining
Indianapolis Area Office
575 North Pennsylvania, Room 301
Indianapolis, Indiana 46204

The IAO can also be contacted by E-mail at IFOMAIL@osmre.gov.

Complete Inspections

During EY 2006, the IAO conducted mine site evaluations on a sample of 33 equally divided active and non-active mining operations to gain an overview of the on-the-ground impacts of these operations. In so far as possible, these inspections were conducted jointly with State inspectors. During these complete inspections, the IAO found 25 violations. Of the 25 violations encountered, 16 had on-the-ground impacts. This is a reduction of 24 on-the-ground violations from EY 2005. Thirteen of the 25 violations were found on active units, and 12 violations on non-active units. The IAO concluded that the LRD is successfully ensuring that coal mining is being conducted in a manner that causes few adverse on-the-ground impacts.

Also during the IAO complete oversight inspections during the EY, the IAO reviewed the operator's compliance in conducting required inspections and annual certifications for Mine Safety and Health Administration (MSHA) sized impoundments. One instance was found where the operator had not conducted the required inspections or annual certification. The State has issued enforcement action against this operator and is in the process of revoking the permit. It was determined by the IAO that even if the MSHA structure were to fail, that it would not jeopardize the safety of the public.

Post-Construction AML Emergency Projects

The EY 2006 Illinois AML Performance Agreement included a component called Post-Construction AML Emergency Projects. The purpose of this routine oversight activity was to evaluate: (1) the success of completed, federally funded emergency reclamation projects, including the AML Program's NEPA compliance procedures and other emergency program requirements.

Review findings of this evaluation were that emergency reclamation: (1) was successfully accomplished; (2) met project design goals; (3) was generally performed in a cost-effective manner; (4) resulted in a net benefit to society, and (5) project sites were stable and in no need of maintenance. Environmental compliance responsibilities were met.

Based on these findings, the IAO concluded that the potential for the long-term success of emergency reclamation done by the Illinois Program is very good. The Illinois AML Emergency Program is deemed successful.

August 21, 2006

AMLIS Inventory Data Verification

This evaluation began as a result of an Inspector General's (IG) Audit Report: Inventory System and Performance Results of the Abandoned Mine Land Program. In order to implement a remedy for the IG's finding, and the recommendation to "Establish a quality control system that ensures that States, Tribes and OSM, as applicable, review and certify the accuracy of data entered into AMLIS," the IAO requested documentation of the system utilized by the AMLRD ensuring accuracy of AMLIS data and certification that the system exists. The IAO received documentation of the procedures that are in place to maintain and verify the accuracy of AMLIS information with a signed certification that the procedures are in place.

Annually, the IAO is to review a random sample of the information entered in AMLIS during the year to verify that it matches the information maintained in hard copy. Guided by OSM Directive AML-1, Abandoned Mine Land Inventory, and IG Audit Report No. 2003-I-0074, the IAO conducted its evaluation during EY 2006 of the effectiveness of the AMLRD in ensuring data accuracy in the AMLIS. The effectiveness of the AMLRD in ensuring data accuracy in the AMLIS was determined by the IAO doing a walk through with AMLRD of the certified procedures on file. Secondly, the IAO selected a random sample of Problem Area Descriptions (PAD) and compared the hard copy of the PAD with a printed PAD from AMLIS.

The IAO verified the certified procedures transmitted by memo and on file in the IAO. The IAO concludes that the AMLRD's process in ensuring data accuracy is highly successful.

AML Water Quality Monitoring Evaluation

The 2006 EY Performance Agreement between the IAO and the AMLRD included an evaluation of the State's AML project water monitoring practices. The AMLRD and IAO both felt that this program element needed to undergo a thorough assessment because of its significance in contributing to, and measurement of, the overall success of the State's reclamation efforts.

This evaluation yielded the following results: (1) monitoring data collected in the project planning phase, as well as during and after construction, should be more consistent throughout the program and sampling protocols varied too widely; (2) standardized, written surface and ground water sampling and monitoring procedures should be developed; and (3) an agency level database to handle the data and coordinated with a geographic information system (GIS) should be established.

Based on these findings, the following recommendations are offered for consideration:

- Develop a standardized water monitoring program.
- Establish an agency-wide database to coordinate with GIS information to support factually based management decisions.
- Develop stronger interagency coordination and partnerships.

The State AML Program should develop its own water monitoring program because the AMLRD alone should decide what best meets its needs. However, the IAO stands ready to provide assistance if requested.

APPENDIX A:

These tables present data pertinent to mining operations and State and Federal regulatory activities within Illinois. They also summarize funding provided by OSM and Illinois staffing. Unless otherwise specified, the reporting period for the data contained in all tables is the same as the evaluation year. Additional data used by OSM in its evaluation of Illinois' performance is available for review in the evaluation files maintained by the Indianapolis OSM Office.

TABLE 1 – COAL PRODUCTION.....	T-1
TABLE 2 – INSPECTABLE UNITS.....	T-2
TABLE 3 – STATE PERMITTING ACTIVITY.....	T-3
TABLE 4 – OFF-SITE IMPACTS	T-4
TABLE 5 – ANNUAL STATE MINING AND RECLAMATION RESULTS	T-5
TABLE 6 – OPTIONAL (NOT USED)	
TABLE 7 – STATE BOND FORFEITURE ACTIVITY.....	T-7
TABLE 8 – ILLINOIS STAFFING.....	T-8
TABLE 9 – FUNDS GRANTED TO ILLINOIS BY OSM	T-9
TABLE 10 – INSPECTION ACTIVITY.....	T-10
TABLE 11 – ENFORCEMENT ACTIVITY.....	T-11
TABLE 12 – LANDS UNSUITABLE ACTIVITY.....	T-12

TABLE 1

COAL PRODUCTION (Millions of short tons)			
Period	Surface mines	Underground mines	Total
Coal production ^A for entire State:			
Annual Period			
2003	5.850	26.190	32.040
2004	5.560	27.520	33.080
2005	6.332	26.221	32.553
Total	17.742	79.931	97.673

A Coal production as reported in this table is the gross tonnage which includes coal that is sold, used or transferred as reported to OSM by each mining company on form OSM-1 line 8(a). Gross tonnage does not provide for a moisture reduction. OSM verifies tonnage reported through routine auditing of mining companies. This production may vary from that reported by States or other sources due to varying methods of determining and reporting coal production. **Provide production information for the latest three full calendar years to include the last full calendar year for which data is available.**

TABLE 2

INSPECTABLE UNITS													
As of June 30, 2006													
Coal mines and related facilities	Number and status of permits								Insp. Units ^D	Permitted acreage ^A (hundreds of acres)			
	Active or temporarily inactive		Inactive		Abandoned		Totals						
			Phase II bond release										
	IP	PP	IP	PP	IP	PP	IP	PP		IP	PP	Total	
STATE AND PRIVATE LANDS REGULATORY AUTHORITY: STATE													
Surface mines	8	58	6		13		8	77	37	7	335	342	
Underground mines		28	0		0		0	28	37		140	140	
Other facilities		72	1		1		0	74	16		127	127	
Subtotals	8	158	0	7	0	14	8	179	90	7	602	609	
FEDERAL LANDS REGULATORY AUTHORITY: STATE													
Surface mines							0	0				0	
Underground mines		2					0	2	2		0	0	
Other facilities							0	0				0	
Subtotals	0	2	0	0	0	0	0	2	2	0	0	0	
ALL LANDS ^B													
Surface mines	8	58	6		13		8	77	37	7	335	342	
Underground mines		28					0	28	37		140	140	
Other facilities		72	1		1		0	74	16		127	127	
Totals	8	158	0	7	0	14	8	179	90	7	602	609	
Average number of permits per inspectable unit (excluding exploration sites)									2				
Average number of acres per inspectable unit (excluding exploration sites)									668				
Number of exploration permits on State and private lands:									0		On Federal lands ^C :		0
Number of exploration notices on State and private lands:									30		On Federal lands ^C :		0
IP: Initial regulatory program sites PP: Permanent regulatory program sites													
^A When a unit is located on more than one type of land, include only the acreage located on the indicated type of land. ^B Numbers of units may not equal the sum of the three preceding categories because a single inspectable unit may include lands in more than one of the preceding categories. ^C Includes only exploration activities regulated by the State pursuant to a cooperative agreement with OSM or by OSM pursuant to a Federal lands program. Excludes exploration regulated by the Bureau of Land Management. ^D Inspectable Units includes multiple permits that have been grouped together as one unit for inspection frequency purposes by some State programs.													

TABLE 3

**STATE PERMITTING ACTIVITY
As of June 30, 2006**

Type of Application	Surface mines			Underground mines			Other facilities			Totals		
	App. Rec.	Issued	Acres	App. Rec.	Issued	Acres ^A	App. Rec.	Issued	Acres	App. Rec.	Issued	Acres
New Permits	5	2	565	3	2	1,465	1	3	172	9	7	2,202
Renewals	6	8		5	3		5	5		16	16	0
Transfers, sales and assignments of permit rights	5	4		2	4		1	5		8	13	
Small operator assistance	0	0		0	0		0	0		0	0	
Exploration permits	0	0		0	0		0	0		0	0	
Exploration notices ^B		30									30	
Revisions (exclusive of incidental boundary revisions)		0			0			0			0	
Incidental boundary revisions		9	162		7	42		2	36		18	239
Totals	16	53	727	10	16	1,507	7	15	208	33	84	2,441

OPTIONAL - Number of midterm permit reviews completed that are not reported as revisions.

^A Includes only the number of acres of proposed surface disturbance.

^B State approval not required. Involves removal of less than 250 tons of coal and does not affect lands designated unsuitable for mining.

TABLE 4

OFF-SITE IMPACTS														
RESOURCES AFFECTED			People			Land			Water			Structures		
DEGREE OF IMPACT			minor	moderate	major	minor	moderate	major	minor	moderate	major	minor	moderate	major
TYPE OF IMPACT AND TOTAL NUMBER OF EACH TYPE	Blasting	1				1								
	Land Stability													
	Hydrology	9					1		8					
	Encroachment	6				5	1							
	Other													
	Total	16	0	0	0	6	2	0	8	0	0	0	0	0
Total number of inspectable units: 90														
Inspectable units free of off-site impacts: 81														
OFF-SITE IMPACTS ON BOND FORFEITURE SITES														
RESOURCES AFFECTED			People			Land			Water			Structures		
DEGREE OF IMPACT			minor	moderate	major	minor	moderate	major	minor	moderate	major	minor	moderate	major
TYPE OF IMPACT AND TOTAL NUMBER OF EACH TYPE	Blasting													
	Land Stability													
	Hydrology													
	Encroachment													
	Other													
	Total	0	0	0	0	0	0	0	0	0	0	0	0	0
Total number of inspectable units: 3														
Inspectable units free of off-site impacts: 3														

Refer to the report narrative for complete explanation and evaluation of the information provided by this table.

TABLE 5

ANNUAL STATE MINING AND RECLAMATION RESULTS		
Bond release phase	Applicable performance standard	Acreage released during this evaluation period
Phase I	<ul style="list-style-type: none"> - Approximate original contour restored - Topsoil or approved alternative replaced 	5,081.99
Phase II	<ul style="list-style-type: none"> - Surface stability - Establishment of vegetation 	5,122.78
Phase III	<ul style="list-style-type: none"> - Post-mining land use/productivity restored - Successful permanent vegetation - Groundwater recharge, quality and quantity restored - Surface water quality and quantity restored 	6,786.58
	Bonded Acreage Status^A	Acres
Total number of acres bonded at end of last review period (June 30, 2005) ^B		56,662.36
Total number of acres bonded during this evaluation year		5,809.38
Number of acres bonded during this evaluation year that are considered remining, if available		
Number of acres where bond was forfeited during this evaluation year (also report this acreage on Table 7)		124.86

^A Bonded acreage is considered to approximate and represent the number of acres disturbed by surface coal mining and reclamation operations.

^B Bonded acres in this category are those that have not received a Phase III or other final bond release (State maintains jurisdiction).

TABLE 7

STATE BOND FORFEITURE ACTIVITY (Permanent Program Permits)		
Bond Forfeiture Reclamation Activity by SRA	Number of Sites	Acres
Sites with bonds forfeited and collected that were unreclaimed as of June 30, 2005 (end of previous evaluation year) ^A	3	190.00
Sites with bonds forfeited and collected during Evaluation Year 2006 (current year)	1	124.86
Sites with bonds forfeited and collected that were re-permitted during Evaluation Year 2006 (current year)	1	99.62
Sites with bonds forfeited and collected that were reclaimed during Evaluation Year 2006 (current year)	0	
Sites with bonds forfeited and collected that were unreclaimed as of June 30, 2006 (end of current year) ^A	4	314.86
Sites with bonds forfeited but uncollected as of June 30, 2006 (end of current year)	0	
Surety/Other Reclamation (In Lieu of Forfeiture)		
Sites being reclaimed by surety/other party as of June 30, 2005 (end of previous evaluation year) ^B	2	1,240.00
Sites where surety/other party agreed to do reclamation during Evaluation Year 2006 (current year)	1	86.10
Sites being reclaimed by surety/other party that were re-permitted during Evaluation Year 2006 (current year)	0	
Sites with reclamation completed by surety/other party during Evaluation Year 2006 (current year) ^C	1	100.52
Sites being reclaimed by surety/other party as of June 30, 2006 (current evaluation year) ^B	2	1,225.58
^A Includes data only for those forfeiture sites not fully reclaimed as of this date ^B Includes all sites where surety or other party has agreed to complete reclamation and site is not fully reclaimed as of this date ^C This number also is reported in Table 5 as Phase III bond release has been granted on these sites		

TABLE 8

STATE STAFFING (Full-time equivalents at the end of evaluation year)	
Function	EY 2006
Regulatory Program	
Permit review	12.80
Inspection	9.90
Other (administrative, fiscal, personnel, etc.)	9.00
Regulatory Program Total	31.70
AML Program Total	24.00
TOTAL	55.70

TABLE 9

FUNDS GRANTED TO ILLINOIS BY OSM (Millions of dollars) EY 2006		
Type of Grant	Federal Funds Awarded	Federal Funding as a Percentage of Total Program Costs
Administration and Enforcement	\$2.38	50
Small Operator Assistance	\$0.00	0
Totals	\$2.38	

TABLE 10

<p>STATE INSPECTION ACTIVITY</p> <p>PERIOD: JULY 1, 2005 - JUNE 30, 2006</p>		
<p>Inspectable Unit</p> <p>Status</p>	<p>Number of Inspections Conducted</p>	
	<p>Complete</p>	<p>Partial</p>
Active*	383	808
Inactive*	4	25
Abandoned*	16	35
Total	403	868
Exploration		14

* Use terms as defined by the approved State program.

State should provide inspection data to OSM annually, at a minimum, and maintain inspection data on a continual basis. OSM offices responsible for Federal and Indian Programs need not complete this table since data will be queried from the I & E Tracking System.

TABLE 11

STATE ENFORCEMENT ACTIVITY		
PERIOD: JULY 1, 2005 - JUNE 30, 2006		
Type of Enforcement Action	Number of Actions*	Number of Violations*
Notice of Violation	26	37
Failure-to-Abate Cessation Order	0	0
Imminent Harm Cessation Order	0	0

* Do not include those violations that were vacated.

State should provide enforcement data to OSM annually, at a minimum, and maintain data on a continuous basis. OSM offices responsible for Federal and Indian Programs need not complete this table since data will be queried from the I & E Tracking System.

TABLE 12

<p>LANDS UNSUITABLE ACTIVITY</p> <p>PERIOD: JULY 1, 2005 - JUNE 30, 2006</p>			
Number of Petitions Received	4		
Number of Petitions Accepted	0		
Number of Petitions Rejected	2		
Number of Decisions Declaring Lands Unsuitable	0	Acreage Declared as Being Unsuitable	0
Number of Decisions Denying Lands Unsuitable	0	Acreage Denied as Being Unsuitable	0

State should provide lands unsuitable data to OSM annually if there is any activity in this program area
OSM OFFICES RESPONSIBLE FOR FEDERAL AND INDIAN PROGRAM STATES MUST
ALSO COMPLETE THIS TABLE.

APPENDIX B:

This Appendix contains the Illinois Office of Mines and Minerals, Land Reclamation Division and Abandoned Mine Land Reclamation Division's comments on the draft Evaluation Report, which the IAO received on August 17th and 18th, 2006. A photocopy of the State's comments follows this page.

The Alton Field Division Chief's disposition of the State's comments is presented below.

Disposition of Comments:

The comments provided by the State were incorporated as appropriate.

August 21, 2006