

MEMORANDUM

TO: **FILE – CANYON FUEL COMPANY, LLC – Skyline Mines**

THROUGH: Chad Gilgen, Minor Source Compliance Section Manager *CG*

FROM: Daniel Riddle, Environmental Scientist *DR*

DATE: October 8, 2024

SUBJECT: **FULL COMPLIANCE EVALUATION, Minor, Carbon County**

INSPECTION DATE: July 10, 2024

SOURCE LOCATION: Eccles Canyon
Scofield, UT 84526

DIRECTIONS: Take US-6 east toward Price. Turn right onto UT-96 south to Scofield in Spanish Fork Canyon. Continue on UT-96 south past Scofield and stay on UT-96 south as it becomes UT-264 west by the lower mine rail load out. Follow UT-264 west for 2.7 miles. The main office is located where the overland conveyor begins.

SOURCE CONTACTS: Brayden Wilson, Environmental Engineer
435-448-2685, bwilson@wolverinefuels.com

OPERATING STATUS: Operating normally at time of inspection.

PROCESS DESCRIPTION: Coal is mined from an underground mine using hydraulic cutters and loaders. Water sprays are used during the mining process to reduce dust (explosion hazard). The coal is conveyed out of the mine to the surface by a specialty conveyor belt and conveyed to a transfer building and then storage silo (with baghouse) or stacker tube and pile. If the coal is transferred to the stacker tube and pile, it is reintroduced to the transfer belt and silo by an under-pile feeder and belt through the transfer building. Coal from the silo or transfer belt goes to the crusher/screening building, which is fully enclosed and controlled by an upper and lower baghouse. The material is crushed to -2 inches. The lower baghouse also controls the feed end of the conveyor system. Coal from the crusher is transferred to either a truck load-out facility or to a 2.2-mile enclosed conveyor system. The conveyor has a zippered belt, which forms a tube system for the entire length of the trip. The conveyor feeds two 15,000-ton storage silos (both equipped with baghouses) or an overage storage pile. Coal from the stockpile is loaded into haul trucks and trains or transferred to the storage silos. The silos have conveyors that feed coal to either a rail load-out or a stoker coal truck load-out. Both are controlled by baghouses.

APPLICABLE REGULATIONS: Approval Order (AO) DAQE-AN100920003-21, dated September 29, 2021

NSPS (Part 60) Y: Standards of Performance for Coal Preparation and Processing Plants,
MACT (Part 63) ZZZZ: National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

SOURCE EVALUATION:

Name of Permittee:

Permitted Location:

Canyon Fuel Company, LLC
Skyline Mines
A Subsidiary of Wolverine Fuels, LLC
597 South SR 24
Salina, UT 84654

Eccles Canyon
Scofield, UT 84526

SIC Code: 1222: (Bituminous Coal Underground Mining)

Section I: GENERAL PROVISIONS

- I.1 All definitions, terms, abbreviations, and references used in this AO conform to those used in the UAC R307 and 40 CFR. Unless noted otherwise, references cited in these AO conditions refer to those rules. [R307-101]
- I.2 The limits set forth in this AO shall not be exceeded without prior approval. [R307-401]
- I.3 Modifications to the equipment or processes approved by this AO that could affect the emissions covered by this AO must be reviewed and approved. [R307-401-1]
- I.4 All records referenced in this AO or in other applicable rules, which are required to be kept by the owner/operator, shall be made available to the Director or Director's representative upon request, and the records shall include the two-year period prior to the date of the request. Unless otherwise specified in this AO or in other applicable state and federal rules, records shall be kept for a minimum of two (2) years. [R307-401-8]
- I.5 At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any equipment approved under this AO, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Director which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. All maintenance performed on equipment authorized by this AO shall be recorded. [R307-401-4]
- I.6 The owner/operator shall comply with UAC R307-107. General Requirements: Breakdowns. [R307-107]

I.7 The owner/operator shall comply with UAC R307-150 Series. Emission Inventories. [R307-150]

Status: In Compliance. No limits set forth in this AO appear to have been exceeded. The source stated that there have been no modifications to the equipment or processes. The equipment appeared to be properly operated and maintained according to manufacturer recommendations. Records are kept as required and were made available after the inspection. No breakdowns have been reported since the previous inspection. An emissions inventory was submitted for 2023, and emissions data are reported below.

I.8 The owner/operator shall submit documentation of the status of construction or modification to the Director within 18 months from the date of this AO. This AO may become invalid if construction is not commenced within 18 months from the date of this AO or if construction is discontinued for 18 months or more. To ensure proper credit when notifying the Director, send the documentation to the Director, attn.: NSR Section. [R307-401-18]

Status: Out of Compliance. The source did not submit documentation within the 18-month window. Compliance assistance was provided. The source stated on September 10, 2024, that they would write a memo to the director to notify the DAQ on the status of this AO. No further action is recommended at this time.

Section II: SPECIAL PROVISIONS

II.A The approved installations shall consist of the following equipment:

II.A.1 Skyline Mines

II.A.2 Main Conveyor (8,000,000 tons per year throughput)
Drive - Long Airdox, 84 inches wide, 2,000 HP
Rollers - Continental Conveyor, 84 inches wide
Belt - George Duck Belt

II.A.3 Two (2) Crushers
Capacity: 1,500 TPH each

II.A.4 Two Screens (70 tph throughput each)
Thunderbird, 5162.4-14 Inclined Screen
Allis Minerals, Low-Head Horizontal Screen

II.A.5 Stoker Bin
Capacity: 1,900 tons
Bin located at lower mine site

II.A.6 Rock Bin
Capacity: 400 tons
Bin located at lower mine site

II.A.7 Three (3) Coal Silos
Capacities: 8,000 tons, 15,000 tons, and 15,000 tons

II.A.8 Two (2) Emergency Engines
Rating: 2,000 HP each
Fuel: Ultra-low sulfur diesel (ULSD)
Manufacture Year: 2002

II.A.9 Tube Stacker Chute

- II.A.10 **Conveyors**
Various Transport Conveyors including a new conveyor extension for the new Tube Stacker Chute
- II.A.11 **Three (3) Load-out Stations**
Tipple Truck Load-out, upper mine site
Stoker Truck Load-out, lower mine site
Rail Load-out, lower mine site
- II.A.12 **Three (3) Fabric Filter baghouses**
Day Model 72RF10 for ROM silo area
Day Model 72RF10 for ROM silo area
Day Model 72RF10 for crusher area
- II.A.13 **Two (2) Fabric Filter Baghouses**
Dynaclone Model 6A for storage silos
- II.A.14 **One (1) Fabric Filter Baghouse**
Dynaclone Model 7A for rail load-out
- II.A.15 **Fifteen (15) Space Heaters**
Natural gas-fired heaters at various locations
- II.A.16 **Two (2) Boilers**
Natural gas-fired boilers manufactured by Kewanee Boiler Corp. and model number L3W-125-G.
They are each rated at 5 MMBtu for main shop building heat.

Status: In Compliance. No unapproved equipment was observed at the source. The two new generators in II.A.8 have been installed at Swen's Canyon – a portion of the mine property located about 2 miles further west on Highway 264. One of the crushers (II.A.3) has been removed from service. In II.A.7, the 8,000 tons coal silo is the ROM silo, and the two 15,000 tons silos are located at the lower mine site.

II.B Requirements and Limitations

II.B.1 **Site-Wide Requirements**

- II.B.1.a The owner/operator shall not exceed the following direct offsite shipment limits:
 - A. 8,000,000 tons per rolling 12-month period of coal and waste material combined
 - B 4,500,000 tons per rolling 12-month period of coal from each individual load-out.

[R307-401-8]

- II.B.1.a.1 The owner/operator shall:
 - A. Determine direct offsite shipments by supervisor monitoring and maintenance of an operations log.
 - B. Record shipments on a monthly basis
 - C. Use the shipment data to calculate a new rolling 12-month total by the 20th day of each month using data from the previous 12 months
 - D. Keep the shipment records for all periods the plant is in operation.

[R307-401-8]

Status: In Compliance. For the rolling 12-month period from June 2023 – May 2024:

- A. 3,298,487 tons of coal and waste material combined**
- B. 2,896,055 tons from all load-outs combined**

See the attached spreadsheets and email correspondence.

II.B.1.b The owner/operator shall not exceed the following production limits:

- A. 600,000 tons maximum size in the upper elevation stockpile
- B. 8,000,000 tons maximum size from the upper elevation stockpile and lower elevation stockpile combined
- C. 300 tons maximum size in the emergency storage pile
- D. 500,000 tons maximum size in the lower elevation stockpile.

[R307-401-8]

II.B.1.b.1 The owner/operator shall:

- A. Determine production with examination of company coal sales records and examination of company throughput records for the points in question
- B. Record production on a monthly basis
- C. Use the production data to calculate a new rolling 12-month total by the 20th day of each month using data from the previous 12 months
- D. Keep the production records for all periods the plant is in operation.

[R307-401-8]

Status: In Compliance. For the rolling 12-month period from June 2023 – May 2024:

- A. 357,682.57 tons was the largest monthly inventory reported in the upper elevation stockpile.**
- B. 373,682.57 tons was the largest monthly inventory reported for the lower and higher elevation stockpiles combined.**
- C. 0 tons. The emergency storage pile is not currently in use.**
- D. 16,000.00 tons was the largest monthly inventory reported for the lower elevation stockpile.**

See the attached stockpile inventory totals.

II.B.1.c The owner/operator shall transfer coal only by enclosed conveyor. Inter-site truck haulage between the upper mine site and lower mine site may be used only during conveyor emergency periods. [R307-401-8]

Status: In Compliance. All coal is transferred in the enclosed, overland conveyor. The source was familiar with the requirements of this condition and confirmed they are operating accordingly.

II.B.1.d The owner/operator shall utilize flaps on the entry and discharge ends of each conveyor transfer point. [R307-401-8]

Status: In Compliance. All conveyor transfer points were observed to be enclosed and contain flaps on entry and discharge ends.

II.B.1.e The owner/operator shall route all emissions from the ROM Silos to two fabric filter baghouses, Day Model 72RF10, as necessary to prevent visible emissions from exceeding 20% opacity. [R307-401-8]

Status: In Compliance. The baghouses were observed at the time of inspection. The source operates a real-time coal scanning system. Whenever moisture drops below 4%, the baghouses turn on automatically. Coal samples are sent daily to SGS Laboratories in Huntington, UT to provide quality control validation for the real-time coal scanning system. No opacity was observed from the ROM baghouses during the inspection.

II.B.1.f The owner/operator shall route all emissions from crushing and screening operations to a fabric filter baghouse, Day Model 72RF10, as necessary to prevent visible emissions from exceeding 7% opacity. The owner/operator shall enclose all crushing and screening operations. [R307-401-8]

Status: In Compliance. All crushing and screening operations were observed to be enclosed, vented, and controlled by a baghouse. The coal scanning system also monitors the crushing and screening operations and activates the baghouse accordingly. No opacity was observed from the crushing and screening operations during the inspection.

II.B.1.g The owner/operator shall route all emission from Silo No. 1 and Silo No. 2 to the two fabric filter baghouses, Dynaclone Model 6A or equivalent, as necessary to prevent visible emission from exceeding 20% opacity. [R307-401-8]

Status: In Compliance. The two lower elevation silos were observed with a previous inspection to be rated at 15,000 tons each and controlled by two baghouses. The baghouses are activated when excessive dust is detected by the scanning system. No opacity was observed from Silo No. 1 and Silo No. 2 at the lower mine site during the inspection.

II.B.1.h The owner/operator shall route all emissions from The Headhouse (rail load out) to a baghouse, Dynaclone Model 7A or equivalent, as necessary to prevent visible emissions from exceeding 20% opacity. The owner/operator shall enclose all storage piles at train loadout facilities. [R307-401-8]

Status: In Compliance. The Headhouse baghouse is monitored and controlled by pressurized fabric filters when warranted by excessively dry coal. No opacity was observed coming from the Headhouse baghouse during the inspection.

II.B.1.i The owner/operator shall utilize water sprays or chemical dust suppression sprays at the following points (unless a baghouse controlling enclosed equipment is installed) to control fugitive emissions:

- A. All crushers
- B. All screens
- C. All conveyor transfer points.

[R307-401-8]

II.B.1.i.1 The sprays shall operate to maintain the opacity limits in this AO. [R307-401-8]

Status: In Compliance. All emission points referenced in this condition are enclosed and controlled by baghouses when the scanning system detects that the product is dry. Additionally, the source stated that they do have water sprays to maintain the opacity limits as needed.

II.B.1.j The moisture content of the material shall be maintained at a value of no less than 4% of water by weight. The moisture content shall be tested, if directed by the Director, using the appropriate ASTM method. [R307-401-8]

Status: In Compliance. The source indicated the coal is watered as it is mined and the material is tested for moisture content. Moisture content in the past 12 months ranged from 5.15% to 7.42%. See attached coal moisture spreadsheet.

II.B.1.k The owner/operator shall water the storage piles as necessary to prevent visible emissions from exceed 20% opacity during recovery operations only or as determined necessary by the Director. [R307-401-8]

Status: In Compliance. The material is sufficiently damp after mining that it forms a crust when deposited onto the piles and creates a barrier for fugitive dust.

II.B.1.l The owner/operator shall not allow visible emissions from the following conveyor emission points to exceed the following values:

- A. All conveyor transfer points - 20% opacity
- B. Conveyor drop points - 20% opacity.

[R307-401-8]

Status: In Compliance. No visible emissions were observed at the time of inspection. See the attached VEO form.

II.B.1.m The owner/operator shall not allow visible emissions from all other points to exceed 20% opacity. [R307-401-8]

II.B.1.m.1 Opacity observations of emissions from stationary sources shall be conducted according to 40 CFR 60, Appendix A, Method 9. [R307-401-8]

Status: In Compliance. No opacity was observed from any point during the inspection.

II.B.1.n The coal fines content of the stored coal shall not exceed 5.1 percent by weight, and that of the haul roads and pile areas shall not exceed 10 percent by weight. The coal fines content shall be determined, if directed by the Director, using appropriate ASTM method. The coal fines content is defined as all material passing a #200 U. S. Standard Sieve. [R307-401-8]

Status: In Compliance. See the attached sieve tests from August 27, 2023, and April 22, 2024. The sieve test Sample ID designated as ROM BC-6 is for "Stored Coal" whereas the Sample ID designated as BC-8 is for "Haul Roads and Pile Areas." Both samples would have 0% coal fines passing through a #200 U.S. Standard Sieve. See the attached explanation in the email correspondence with the source.

II.B.2 Haul Roads and Fugitive Dust Sources Requirements

II.B.2.a The owner/operator shall not allow visible emissions from haul road traffic and mobile equipment to exceed 20% opacity. [R307-401-8]

II.B.2.a.1 Visible determination for fugitive dust emissions from haul road traffic and mobile equipment shall use procedures similar to Method 9. The normal requirement for observations to be made at 15-second intervals over a six-minute period shall not apply. Visible emissions shall be measured at the densest point of the plume but at a point not less than 1/2 vehicle length behind the vehicle and not less than 1/2 the height of the vehicle. [R307-401-8]

Status: In Compliance. No visible emissions were observed from haul road traffic or mobile equipment at the time of inspection.

II.B.2.b To prevent visible emissions from exceeding the opacity limits listed in this AO, the owner/operator shall apply water and/or chemical suppressant to all unpaved roads and other unpaved operational areas that are used by mobile equipment. The owner/operator shall apply other controls as necessary to prevent visible emissions from exceeding the opacity limits listed in the AO. [R307-401-8]

II.B.2.b.1 Records of water treatment shall be kept for all periods when the plant is in operation. The records shall include the following items:

- A. Date and time of water and/or chemical suppressant application
- B. Number of water and/or chemical suppressant applications made and quantity of water and/or chemical suppressant applied
- C. Rainfall amount received, if any

[R307-401-8]

Status: In Compliance. The source is familiar with the requirements of this condition and provided records with all the appropriate and relevant information. Watering records were reviewed at the time of inspection.

II.B.2.c The owner/operator shall not allow the speed of vehicles on the haul roads to exceed 25 miles per hour. [R307-401-8]

Status: In Compliance. The source was familiar with the requirements of this condition and confirmed they are operating accordingly. Speed limit signs are posted near the entrance to the main operation and to the entrance to the lower mine site.

II.B.2.d The owner/operator shall clean all coal spills on any paved road immediately. [R307-401-8]

Status: In Compliance. No track out was observed during this inspection. The Environmental Engineer stated that the sweeper is operated when required when coal is spilled onto Eccles Canyon Road.

II.B.3 **Emergency Engine Requirements.**

II.B.3.a The owner/operator shall not operate each emergency engine on site for more than 100 hours per rolling 12-month period during non-emergency situations. There is no time limit on the use of the engines during emergencies. [R307-401-8, 40 CFR 63 Subpart ZZZZ]

Status: Not Observed. The emergency generators are only being stored without any operational potential at this time. The engines are located at the Swen's Canyon portion of the mine property – about 2 miles further west on Highway 264 from Eccles Canyon. They have not been used for any purpose in the past 12 months.

II.B.3.b The owner/operator shall perform maintenance and testing of the emergency generator engines in accordance with the following:

A. The owner/operator shall not operate more than one (1) emergency generator engine at any one time during maintenance and testing operations;

B. Each emergency generator shall be tested no more than once per week.

[R307-401-10]

II.B.3.b.1 To determine compliance with a rolling 12-month total and the maintenance and testing requirements, the owner/operator shall calculate a new 12-month total by the 20th day of each month using data from the previous 12 months. Records documenting the operation of each emergency engine shall be kept in a log and shall include the following:

A. The date the emergency engine was used

B. The duration of operation in hours

C. The reason for the emergency engine usage.

[40 CFR 60 Subpart ZZZZ, R307-401-8]

II.B.3.b.2 To determine the duration of operation, the owner/operator shall install a non-resettable hour meter for each emergency engine. [R307-401-8, 40 CFR 63 Subpart ZZZZ]

Status: Not Observed. The emergency generators are only being stored without any operational potential at this time. They have not been used for any purpose in the past 12 months. Both engines are equipped with a non-resettable hour meter.

II.B.3.c The owner/operator shall only use diesel fuel (e.g. fuel oil #1, #2, or diesel fuel oil additives) as fuel in each emergency engine. [R307-401-8]

II.B.3.c.1 The owner/operator shall only combust diesel fuel that meets the definition of ultra-low sulfur diesel (ULSD), which has a sulfur content of 15 ppm or less. [R307-401-8]

II.B.3.c.2 To demonstrate compliance with the ULSD fuel requirement, the owner/operator shall maintain records of diesel fuel purchase invoices or obtain certification of sulfur content from the diesel fuel supplier. The diesel fuel purchase invoices shall indicate that the diesel fuel meets the ULSD requirements. [R307-401-8]

Status: In Compliance. The source purchases only ULSD fuel for their operations. See attached fuel invoice from Pierce Oil Company, Inc.

Section III: APPLICABLE FEDERAL REQUIREMENTS

In addition to the requirements of this AO, all applicable provisions of the following federal programs have been found to apply to this installation. This AO in no way releases the owner or operator from any liability for compliance with all other applicable federal, state, and local regulations including UAC R307.

NSPS (Part 60) Y: Standards of Performance for Coal Preparation and Processing Plants

Status: Not Applicable. Coal operation has not been reconstructed or modified since AO DAQE-AN10092007-03. Overall production rate, processing equipment, and storage piles have remained consistent since that time. The source has stated that they are familiar with the requirements of Subpart Y and will conduct appropriate testing if any applicable equipment is replaced or reconstructed in the future. See DAQC-1331-21 for more details.

MACT (Part 63) ZZZZ: National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

Status: Not Observed. The emergency generators are only being stored without any operational potential at this time. They have not been used for any purpose in the past 12 months.

AREA SOURCE RULES EVALUATION:

The following Area Source Rules were evaluated during this inspection:

Emission Standards: Sulfur Content of Fuels [R307-203]

Status: In Compliance. The source uses only ultra-low sulfur diesel fuel. This area source rule is satisfied by compliance with condition II.B.3.c.2 of the AO.

Emission Standards: Fugitive Emissions and Fugitive Dust [R307-205]

Status: In Compliance. The source is familiar with the requirements of this area source rule and were operating accordingly at the time of inspection. No opacity was observed from any point during the inspection.

Stationary Sources [R307-210]

Status: Not Applicable. Compliance with this area source rule is satisfied by compliance with Federal Requirements NSPS (Part 60) Subparts Y. See Section III above for more information.

Status: Not Applicable. Compliance with this area source rule is satisfied by compliance with Federal Requirement MACT (Part 63) Subpart ZZZZ. See Section III above for more information.

EMISSION INVENTORY:

Listed below are the Actual Emissions Inventory provided from Canyon Fuel Company, LLC – Skyline Mines for the 2023 emissions reporting year. A comparison of the estimated total potential emissions (PTE) on AO: DAQE-AN100920003-21, dated September 29, 2021, is provided. PTE are supplied for supplemental purposes only.

Criteria Pollutant	PTE tons/yr	Actuals tons/yr
CO ₂ Equivalent	15125.00	N/A
Carbon Monoxide	14.10	1.70898
Nitrogen Oxides	15.37	2.0345
Particulate Matter - PM ₁₀	23.08	24.52653
Particulate Matter - PM _{2.5}	5.19	2.63689
Sulfur Dioxide	0.07	0.01221
Volatile Organic Compounds	1.12	0.1119

Hazardous Air Pollutant	PTE lbs/yr	Actuals lbs/yr
Formaldehyde (CAS #50000)	20	3.06
Hexane (CAS #110543)	440	N/A

PREVIOUS ENFORCEMENT ACTIONS:

No enforcement action within the past five years.

COMPLIANCE STATUS & RECOMMENDATIONS:

In regards to Approval Order (AO) DAQE-AN100920003-21, dated September 29, 2021, the overall status is: Out of Compliance with Condition I.8. See Section I for more details. In compliance with all other requirements. The facility appears to be well maintained and operated. Required records were current and made available during the inspection.

HPV STATUS:

Not Applicable.

RECOMMENDATION FOR NEXT INSPECTION:

Inspect at the regular frequency for this type of source. The mine operates 24 hours a day, 7 days a week. The Environmental staff works 6 am to 3 pm Monday through Friday. Check to see if notification status for Condition I.8 was submitted.

NSR RECOMMENDATIONS:

None at this time.

ATTACHMENTS:

VEO form, email correspondence, rolling 12, ULSD verification, moisture test, stockpile tonnage, sieve tests



STATE OF UTAH, DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF AIR QUALITY

EPA METHOD 9 – VISIBLE EMISSION OBSERVATION FORM

Source Name: Canyon Fuel Company LLC
Street Address: 5400 S. Eagle Canyon
City/County: Scottsdale
Phone: _____
Site ID: 10002
Facility: Coal mine
Equipment/Process: _____
Control Equipment: _____
Emission Point: _____

OBSERVATION DATE: 10 July 2024

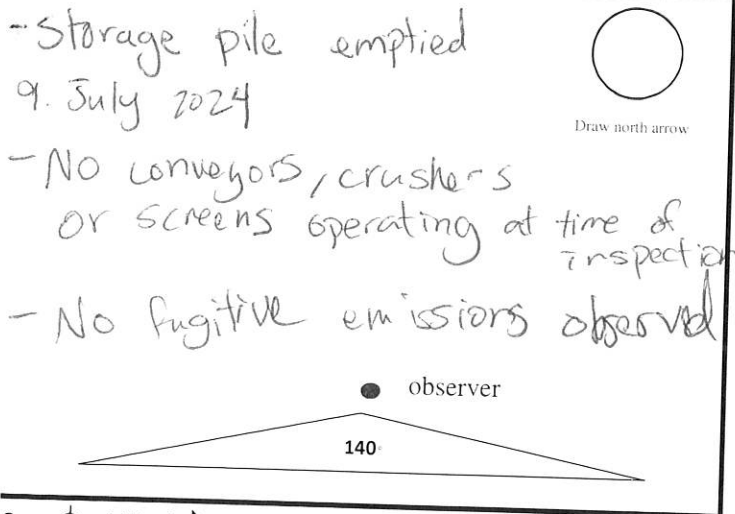
Start time: _____ Stop time: _____

min	sec	0	15	30	45
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

Sky Conditions: Clear Partly Cloudy Overcast
Precipitation: No Yes
Wind: Direction: _____ Speed: _____ mph
Ambient Temp: _____ °F RH: _____ %
Height Relative to Observer: _____
Distance From Observer: _____
Condensed Water Vapor Present: No Yes
Attached Detached
Length of Condensed Water Vapor Plume: _____
Background: _____

COMMENTS:

Sketch process unit: indicate observer position relative to source; indicate potential emission points and/or actual emission points.



Sun ⊕ Wind ▶ Emission Point with Plume ○
Observer Position ✕

Observer's Signature: [Signature]

I have received a copy of these observations:

SIGNATURE: [Signature]
Printed Name: Braiden Wilson
Title: Environmental Engineer



Daniel Riddle <driddle@utah.gov>

10092 - Follow up to air quality inspection

9 messages

Daniel Riddle <driddle@utah.gov>

Thu, Jul 11, 2024 at 8:53 AM

To: bwilson@wolverinefuels.com, cbrooks@wolverinefuels.com

Braden,

Thank you for meeting yesterday for your air quality inspection. As discussed, here are the records I require to complete my inspection report:

From AO DAQE-AN-100920003-21:

Condition II.B.1.a - tonnage of coal and waste, as well as tonnage from each individual load-out for coal (June 2023 - May 2024)

Condition II.B.1.b - proof that tonnage never exceeded the 4 limits in this condition (June 2023 - May 2024)

Condition II.B.1.j - proof that moisture content of material is > 4%

Condition II.B.1.n - copy of recent sieve testing showing coal fines content of stored coal as well as haul roads and pile areas

Condition II.B.3.a - hours of usage for the two emergency generators for non-emergency purposes (June 2023 - May 2024)

Condition II.B.3.b - logs of generator testing showing that only one emergency generator was operated for maintenance at a time and each generator was tested no more than once per week at the maximum

Condition II.B.3.c - invoice or proof of purchase of ULSD fuel

Please provide these records by July 18, 2024. Let me know if you have any questions.

Best,
Daniel

Brayden Wilson <bwilson@wolverinefuels.com>

Wed, Jul 17, 2024 at 7:58 AM

To: Daniel Riddle <driddle@utah.gov>, Conner Brooks <cbrooks@wolverinefuels.com>

Good Morning Daniel,

I believe we have compiled all of the data requested to complete the inspection. Please let me know if we missed something or if you need data that was not provided.

Condition II.B.1.a - tonnage of coal and waste, as well as tonnage from each individual load-out for coal (June 2023 - May 2024) - See Attached Rolling Avg.

Condition II.B.1.b - proof that tonnage never exceeded the 4 limits in this condition (June 2023 - May 2024) - See Attached Minesite Stockpile Tons

Condition II.B.1.j - proof that moisture content of material is > 4% - See attached CS- Moisture & LOB (data compiled from channel samples sent for lab analysis)

Condition II.B.1.n - copy of recent sieve testing showing coal fines content of stored coal as well as haul roads and pile areas - See attached Sieve tests

Condition II.B.3.a - hours of usage for the two emergency generators for non-emergency purposes (June 2023 - May 2024) - See explanation below

Condition II.B.3.b - logs of generator testing showing that only one emergency generator was operated for maintenance at a time and each generator was tested no more than once per week at the maximum - See explanation below

Condition II.B.3.c - invoice or proof of purchase of ULSD fuel - See proof of purchase attached

In reference to the logs and hours of usage for the emergency generators, I was unable to provide this because these generators have not been used or tested for emergency or non-emergency in the past 12 months. They have sat idle at the Swens Canyon site that we visited out of service. Please let me know if there is additional information that you need in regard to the emergency generators.

Thank you for your time and let me know if you have any questions.

Thank you,

Brayden Wilson
Environmental Engineer
Skyline Mine

**Wolverine Fuels, LLC**

Skyline Mine

HC 35 Box 380

Helper, UT 84526

Skyline: (435) 448-2685

bwilson@WolverineFuels.com**From:** Daniel Riddle <driddle@utah.gov>**Sent:** Thursday, July 11, 2024 8:53 AM**To:** Brayden Wilson <bwilson@wolverinefuels.com>; Conner Brooks <cbrooks@wolverinefuels.com>**Subject:** 10092 - Follow up to air quality inspection

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[Quoted text hidden]

6 attachments

-  **CS - Moisture % LOB.xlsx**
16K
-  **Minesite Stockpile Tons.xlsx**
11K
-  **Skyline - 2023-2024 Rolling Average.xlsx**
54K
-  **Copy of Receipt for ULSD.pdf**
231K
-  **Skyline - Sieve Crushed 8.27.23.PDF**
111K
-  **Skyline - Sieve Stockpile Uncrushed 4.18.24.PDF**
111K

Daniel Riddle <driddle@utah.gov>
To: Brayden Wilson <bwilson@wolverinefuels.com>
Cc: Conner Brooks <cbrooks@wolverinefuels.com>

T

Brayden,

Apologies for the late reply. I do have a few additional questions for you regarding your records:


- 1) For Condition II.B.1.a - which column in the rolling 12 spreadsheet you sent me should I use for bullet A and which should I use for bullet B? None of the columns are labeled as waste mat
- 2) For Condition II.B.1.n - could you explain the two sieve tests you sent to me? I'm not sure which line of the test to look at and which one applies to "stored coal" (limit of 5.1% coal fines by pile areas" (limit of 10% coal fines by weight).
- 3) Condition I.8 of your AO states:
The owner/operator shall submit documentation of the status of construction or modification to the Director within 18 months from the date of this AO. This AO may become invalid if commenced within 18 months from the date of this AO or if construction is discontinued for 18 months or more. To ensure proper credit when notifying the Director, send the document attn.: NSR Section. [R307-401-18]

I should have included this in my original email, but this notification was technically due on March 29, 2023. If you send that an official notification now, we can mark this condition as compliance dates that the two diesel generators were fully installed and operational.

4) In regards to your engines, 40 CFR Part 60 Subpart IIII (<https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-60/subpart-III>) and 40 CFR Part 63 Subpart ZZZZ (<https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-63/subpart-ZZZZ?toc=1>) require maintenance in accordance with manufacturer's instructions, such as maintenance of hoses, oil, belts, and filters. (Check Tag that both engines sat idle for the past year, but has there been any other maintenance or checks on the performance of the engines?

Thanks and let me know if you have any questions,
Daniel

[Quoted text hidden]

-  **2021 ao.pdf**
16317K

Daniel Riddle <driddle@utah.gov>
To: Brayden Wilson <bwilson@wolverinefuels.com>
Cc: Conner Brooks <cbrooks@wolverinefuels.com>

Mon, Sep 9, 2024 at 10:04 AM

Brayden - any updates here? Let me know if you're still working on obtaining this information.

[Quoted text hidden]

Brayden Wilson <bwilson@wolverinefuels.com>
To: Daniel Riddle <driddle@utah.gov>

Mon, Sep 9, 2024 at 11:50 AM

Good Morning Daniel,

Apologies for the delayed response to your follow up questions, I have been away from the office. I will have all of the information by the end of the day tomorrow if that is not too late. I do have one question - In regard to the maintenance of the generator engines, would you need a log of inspections that have taken place on the generators even though they have been idle and stored at the Swens Canyon site or just confirmation that they are checked on routine inspections of the site?

Thank you,

Brayden Wilson
Environmental Engineer
Skyline Mine



Wolverine Fuels, LLC
Skyline Mine
HC 35 Box 380
Helper, UT 84526
Skyline: (435) 448-2685
bwilson@WolverineFuels.com

From: Daniel Riddle <driddle@utah.gov>
Sent: Monday, September 9, 2024 10:04 AM
To: Brayden Wilson <bwilson@wolverinefuels.com>
Cc: Conner Brooks <cbrooks@wolverinefuels.com>
Subject: Re: 10092 - Follow up to air quality inspection

[Quoted text hidden]

Daniel Riddle <driddle@utah.gov>
 To: Brayden Wilson <bwilson@wolverinefuels.com>

Mon, Sep 9, 2024 at 12:47 PM

I spoke with my manager about this. Are the engines set to automatically start if there was a power outage? Or could they be turned on to power operations? Or are they essentially just being stored without any operation potential at this time?

[Quoted text hidden]



Outlook-cid_image0
3K

Brayden Wilson <bwilson@wolverinefuels.com>
 To: Daniel Riddle <driddle@utah.gov>

1

Yes, they are essentially just being stored without any operational potential and have been for the past rolling 12 months.

See below for clarification on the other follow up questions -

1) For Condition II.B.1.a - which column in the rolling 12 spreadsheet you sent me should I use for bullet A and which should I use for bullet B? None of the columns are labeled as waste - For bullet A use the column E "Trucked" & Column G "Shipped" for sold tons and for bullet B use column C "Produced" for monthly production. On the second tab you will see tit column for Waste Material which is Column D "Shipped to Waste Rock Site From Mine". This column would be any waste material hauled from the mine in the Rolling 12 month per

2) For Condition II.B.1.n - could you explain the two sieve tests you sent to me? I'm not sure which line of the test to look at and which one applies to "stored coal" (limit of 5.1% coal fi roads and pile areas" (limit of 10% coal fines by weight).

- The sieve test designated in the Sample ID as ROM would be indicative of "Stored Coal" whereas the other designated on the Sample ID as BC-6 would be indicative of "Haul Roa

3) Condition I.8 of your AO states:

The owner/operator shall submit documentation of the status of construction or modification to the Director within 18 months from the date of this AO. This AO may become invalid i commenced within 18 months from the date of this AO or if construction is discontinued for 18 months or more. To ensure proper credit when notifying the Director, send the docum attn.: NSR Section. [R307-401-18]

- We will send notice in a memo promptly to the director that the emergency generators are on site in mobile containment.

Thank you,

Brayden Wilson
 Environmental Engineer
 Skyline Mine



Wolverine Fuels, LLC
 Skyline Mine
 HC 35 Box 380
 Helper, UT 84526
 Skyline: (435) 448-2685
bwilson@WolverineFuels.com

From: Daniel Riddle <driddle@utah.gov>
Sent: Monday, September 9, 2024 12:47 PM
To: Brayden Wilson <bwilson@wolverinefuels.com>
Subject: Re: 10092 - Follow up to air quality inspection

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I spoke with my manager about this. Are the engines set to automatically start if there was a power outage? Or could they be turned on to power operations? Or are they essentially just being operation potential at this time?

On Mon, Sep 9, 2024 at 11:50 AM Brayden Wilson <bwilson@wolverinefuels.com> wrote:

Good Morning Daniel,

Apologies for the delayed response to your follow up questions, I have been away from the office. I will have all of the information by the end of the day tomorrow if that is not too late - In regard to the maintenance of the generator engines, would you need a log of inspections that have taken place on the generators even though they have been idle and stored at just confirmation that they are checked on routine inspections of the site?

Thank you,

Brayden Wilson
Environmental Engineer
Skyline Mine

Wolverine Fuels, LLC
[Quoted text hidden]
[Quoted text hidden]

Brayden Wilson <bwilson@wolverinefuels.com>
To: Daniel Riddle <driddle@utah.gov>

Fri, Sep 13, 2024 at 6:40 AM

Good Morning Daniel,

I spoke with the lab that conducts the sieve analysis and they explained the process in greater detail. The #200 US standard sieve is a 75mm opening for very small particle size which I assume is why we are permitted to test on that sieve for coal fines. If you notice on the Sieve analysis that I sent to you, BC-8 (Haul Road & Pile Area) starts on a 2-1/2" sieve and works down until 0% of the material is passing through a 1/4" opening size sieve. The analysis on the BC-6 ROM (Stored Coal) starts analysis on a 4" sieve opening and works down to 1/4" sieve to which 0% of the material passes through.

I asked the lab why we do not have analysis on a US Standard #200 sieve referenced in the approval order and they explained to me that the material size had 0% passing at 1/4" sieve therefore it would also have 0% passing through a #200 sieve with a 75mm opening size as it is much smaller. In the approval order for condition II.B.2.n the coal fines content is defined as all material passing a #200 U.S. Standard Sieve. Both of these sieve analysis would be 0% passing a #200 sieve.

If we need that documented I can request that the lab notes this on the analysis report from here forward.

Thank you,

Brayden Wilson
Environmental Engineer
Skyline Mine



Wolverine Fuels, LLC
Skyline Mine
HC 35 Box 380
Helper, UT 84526
Skyline: (435) 448-2685
bwilson@WolverineFuels.com

From: Daniel Riddle <driddle@utah.gov>
Sent: Monday, September 9, 2024 12:47 PM
To: Brayden Wilson <bwilson@wolverinefuels.com>
Subject: Re: 10092 - Follow up to air quality inspection

CAUTION: This email originated from outside of Wolverine Fuels. Do not click (select) links or open attachments unless you recognize the sender and know the content is safe. Report suspicious email through the "Report Phishing" button on your email toolbar.

I spoke with my manager about this. Are the engines set to automatically start if there was a power outage? Or could they be turned on to power operations? Or are they essentially just being stored without any operation potential at this time?

On Mon, Sep 9, 2024 at 11:50 AM Brayden Wilson <bwilson@wolverinefuels.com> wrote:

Good Morning Daniel,

9/16/24, 10:03 AM

State of Utah Mail - 10092 - Follow up to air quality inspection

Apologies for the delayed response to your follow up questions, I have been away from the office. I will have all of the information by the end of the day tomorrow if that is not too late. I do have one question - In regard to the maintenance of the generator engines, would you need a log of inspections that have taken place on the generators even though they have been idle and stored at the Swens Canyon site or just confirmation that they are checked on routine inspections of the site?

Thank you,

Brayden Wilson
Environmental Engineer
Skyline Mine

Wolverine Fuels, LLC

[Quoted text hidden]

[Quoted text hidden]

Daniel Riddle <driddle@utah.gov>
To: Brayden Wilson <bwilson@wolverinefuels.com>

Mon, Sep 16, 2024 at 10:03 AM

Thank you for the clarification. This email should be sufficient at this time.

[Quoted text hidden]



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3K

THROUGHPUT FOR CANYON FUEL COMPANY, L
For May 2023 TO June 2024

<u>MONTH</u>	<u>PRODUCED</u>	<u>TRUCKED</u>	<u>SHIPPED</u>	<u>Miscellaneous</u>
May-23	343,290	83,934	320,657	-
Jun-23	263,259	76,435	171,575	38,184
Jul-23	378,287	94,482	119,875	10,826
Aug-23	162,218	41,900	174,257	7,897
Sep-23	87,623	66,818	179,471	8,952
Oct-23	315,503	107,583	174,844	3,152
Nov-23	34,724	108,620	79,559	296
Dec-23	42,430	60,536	33,382	16,170
Jan-24	330,591	98,341	62,222	11,585
Feb-24	315,548	150,281	74,094	17
Mar-24	328,192	213,038	56,059	
Apr-24	96,883	98,055	33,858	
May-24	64,474	111,120	59,725	
Jun-24	83,033	178,113	70,239	

.LC/SKYLINE MINE

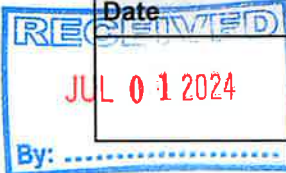
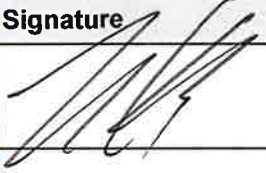
IN	OUT	TRUCKED
Last 12 Month	Last 12 Month	OUT
<u>Rolling Period</u>	<u>Rolling Period</u>	<u>Rolling Period</u>
343,290	320,657	83,934
606,549	492,232	198,553
984,836	612,107	303,861
1,147,054	786,364	353,658
1,234,677	965,835	429,428
1,550,180	1,140,679	540,163
1,584,904	1,220,238	649,079
1,627,334	1,253,620	725,785
1,957,925	1,315,842	835,711
2,273,473	1,389,936	986,009
2,601,665	1,445,995	1,199,047
2,698,548	1,479,853	1,297,102
2,763,022	1,539,578	1,408,222
2,846,055	1,609,817	1,586,335

Month	High Ash Coal to Wash Plant from Mine	Shipped from Waste Rock Site	Shipped to Waste Rock Site from Mine	Coal to Dugout Canyon Mine		Total
May-23	-	-	-	-		-
Jun-23	38,184.00	-	-	-		38,184.00
Jul-23	7,437.00	3,389.00	-	-		10,826.00
Aug-23	-	7,897.00	-	-		7,897.00
Sep-23	-	8,951.70	-	-		8,951.70
Oct-23	-	3,152.00	-	-		3,152.00
Nov-23	296.00	5,256.00	-	-		5,552.00
Dec-23	16,170.00	-	-	-		16,170.00
Jan-24	11,585.00	-	-	-		11,585.00
Feb-24		-	-	17.26		17.26
Mar-24		-	-			-
Apr-24		-	-			-
May-24		-	-			-
Jun-24		-	-			-
	73,672.00	28,645.70	-	17.26	-	102,334.96

**BOWIE RESOURCES LLC
RECEIVING WORKSHEET**

Vendor	Vendor Name	PO Number	Purchasing Grp	Vendor Reference
100459	PIERCE OIL COMPANY, INC.	486059	211	96549

PO Line #/ Material #	Description	Mfg	Mfr Part Number	Bin Number/ Recipient	Order Qty	UOM	Resv Qty/ On Hand Qty	Prev. Rcv Qty	To Come	Qty Rec
00010 917633	FUEL, DIESEL - #2 DYED, ULTRA LS	SKY	0120003C	TANK	4,920	GAL	0 6,795	4,920	0	
00020 917633	FUEL, DIESEL - #2 DYED, ULTRA LS	SKY	0120003C	TANK	7,100	GAL	0 6,795	7,100	0	
00030 917633	FUEL, DIESEL - #2 DYED, ULTRA LS	SKY	0120003C	TANK	5,987	GAL	0 6,795	5,987	0	
00040 917633	FUEL, DIESEL - #2 DYED, ULTRA LS	SKY	0120003C	TANK	3,000	GAL	0 6,795	3,000	0	
00050 917633	FUEL, DIESEL - #2 DYED, ULTRA LS	SKY	0120003C	TANK	960	GAL	0 6,795	960	0	
00060 917633	FUEL, DIESEL - #2 DYED, ULTRA LS	SKY	0120003C	TANK	4,961	GAL	0 6,795	4,961	0	
00070 917633	FUEL, DIESEL - #2 DYED, ULTRA LS	SKY	0120003C	TANK	1,000	GAL	0 6,795	1,000	0	
00080 917633	FUEL, DIESEL - #2 DYED, ULTRA LS	SKY	0120003C	TANK	3,000	GAL	0 6,795	0	3,000	
00090 917633	FUEL, DIESEL - #2 DYED, ULTRA LS	SKY	0120003C	TANK	5,000	GAL	0 6,795	0	5,000	
00100 917633	FUEL, DIESEL - #2 DYED, ULTRA LS	SKY	0120003C	TANK	5,000	GAL	0 6,795	0	5,000	

 <p>RECEIVED JUL 01 2024 By:</p>	Date	Signature
		



332 West Railroad Ave.
 P.O. Box 792
 Price, Utah 84501
 (435) 637-3211 • Fax (435) 637-6628

DELIVERY TICKET

96549

In Case of Emergency Contact Office (435) 637-3211
 Personal Emergency Response Service 1-800-633-8253 or 911

Sold To:

Canyon Fuels Co

Date: 6-27-24

P.O. No.: 486059

R & M/2 Octane Rating is

Shipped to:

Skyline Mine

Unleaded 85 _____ Plus 88 _____

Super 91 _____

- PRODUCT DESCRIPTION -	KIND	GALLONS DELIVERED	MOTOR FUEL TAXES INCLUDED IN PRICE			PRICE INCLUDING TAXES	AMOUNT
			FED.	STATE	OTHER		
UN 1203, GASOLINE, 3, PG II, UNLEADED PREMIUM, MAY CONTAIN UP TO 10% ETHANOL							
UN 1203, GASOLINE, 3, PG II, UNLEADED PLUS, MAY CONTAIN UP TO 10% ETHANOL							
UN 1203, GASOLINE, 3, PG II, UNLEADED REGULAR, MAY CONTAIN UP TO 10% ETHANOL							
NA1993, DIESEL FUEL, 3, PG III, CLEAR, ON ROAD							
ULTRA LOW SULFUR TREATED IF CHECKED <input type="checkbox"/>							
NA1993, DIESEL FUEL, 3, PG III, DYED, OFF ROAD	<u>BK</u>	<u>3,000</u>					
ULTRA LOW SULFUR <u>#2</u> TREATED IF CHECKED <input checked="" type="checkbox"/>							
LUBE OILS, GREASE & OTHER PRODUCTS	PRODUCT CODE	PACKAGES DELIVERED		GALLONS OR POUNDS	PRICE EXCLUDING TAXES	AMOUNT	
		NO	KIND				
<u>Upper Dozer Tank</u>				<u>1,000</u>			
<u>Main Tank</u>				<u>2,000</u>			
DELIVERY FEE		<u>1</u>	<u>EA</u>				
L.O.F.							
A service charge of 1 1/2% per month will be made on past due accounts. 18% annual. The undersigned, personally, jointly and severally unconditionally guarantee prompt payment when due of all indebtedness and liabilities that now, or at anytime or times hereafter may be or become owing to the credit grantor from the above named applicant for credit. The undersigned further guarantees the payment of all interest, attorney's fees, court costs, and other costs of collections which may result from failure to comply with the standard terms and conditions of sale.					SUBTOTAL		
					SALES TAX		
					TOTAL		

Line #0

DRIVER SIGNATURE: _____

Page

UNIT# _____

RECEIVED BY: X

Print Last Name _____

BOL # _____

BOL # _____

Am. of Inv. _____
Chk. _____
C.C. _____
Cash _____

DYED DIESEL FUEL FOR NONTAXABLE USE ONLY. PENALTY FOR TAXABLE USE.

CLEAR DIESEL FUEL. DOES NOT CONTAIN ANY EVIDENCE OF DYE.

COAL MOISTURE % FOR CANYON FUEL COMPANY, LLC/SKYLINE MINE
For May 2023 TO Present

Date Taken	Seam	Total Moisture (%)	Eq Moisture (%)
3-Apr-23	LOB	6.82	5.80
28-Jun-23	LOB	5.88	5.10
15-Jan-24	LOB	5.69	4.90
26-Jan-24	LOB	6.02	5.20
11-Mar-24	LOB	6.11	5.30
18-Mar-24	LOB	6.01	5.20
1-Apr-24	LOB	5.52	4.90
2-May-24	LOB	6.04	5.30
14-May-24	LOB	6.19	5.60
23-May-24	LOB	5.15	4.80
12-Jun-24	LOB	7.42	6.10

END OF MONTH STOCKPILE TONNAGE FOR CANYON FUEL COMPANY
For May 2023 TO June 2024

	Upper Stockpile Tonnage	Lower Stockpile Tonnage	Emergency Storage Pile Tonnage
May-23	3,781.09	16,000.00	-
Jun-23	35,624.81	13,000.00	-
Jul-23	222,273.57	600	-
Aug-23	211,571.18	3,200.00	-
Sep-23	68,296.72	1,500.00	-
Oct-23	136,165.42	4,500.00	-
Nov-23	26,673.97	7,000.00	-
Dec-23	27,127.26	16,000.00	-
Jan-24	189,889.82	16,000.00	-
Feb-24	289,599.18	16,000.00	-
Mar-24	357,682.57	16,000.00	-
Apr-24	315,828.27	16,000.00	-
May-24	208,687.11	16,000.00	-
Jun-24	34,998.26	16,000.00	-

' , LLC/SKYLINE MINE

TOTALS

19,781.09
48,624.81
222,873.57
214,771.18
69,796.72
140,665.42
33,673.97
43,127.26
205,889.82
305,599.18
373,682.57
331,828.27
224,687.11
50,998.26



Analysis Report

August 28, 2023

CANYON FUEL SKYLINE MINES

HCR 35 BOX 380
ACCOUNTS PAYABLE
HELPER UT 84526

Client Sample ID: SKYLINE MINE Sample ID By: Wolverine Fuels
Date Sampled: Aug 27, 2023 Mine: Skyline
Date Received: Aug 28, 2023 Sample ID: BC-8
Product Description: Coal Sample Wt.: 39.62 lbs

SGS Minerals Sample ID: 782-2311289-001

SIEVE ANALYSIS ASTM D4749/D293

Table with 5 columns: Passing, Retained on, % Weight, % Retained, % Passing. Rows include sieve sizes from 2-1/2" Sq down to 1/4" Sq.

Bobbie Green
Lab Manager

SGS North America Inc. Natural Resources
2035 North Airport Road Huntington UT 84528 t (435) 653-2311 f (435)-653-2436 www.sgs.com/minerals

Member of the SGS Group (Société Générale de Surveillance)

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April 22, 2024

CANYON FUEL SKYLINE MINES

HCR 35 BOX 380
ACCOUNTS PAYABLE
HELPER UT 84526

Page 1 of 1

Client Sample ID:	SKYLINE MINE	Sample ID By:	Wolverine Fuels
Date Sampled:	Apr 18, 2024	Mine:	Skyline
Date Received:	Apr 19, 2024	Sample ID:	BC 6 ROM Sieve
Product Description:	Coal	Sample Wt.:	256.07 lbs

SGS Minerals Sample ID: 782-2416739-001

SIEVE ANALYSIS ASTM D4749/D293

CUMULATIVE RESULTS

<u>Passing</u>	<u>Retained on</u>	<u>% Weight</u>	<u>% Retained</u>	<u>% Passing</u>
----	4" Sq	5.37	5.37	94.63
4" Sq	2-1/2" Sq	7.05	12.42	87.58
2-1/2" Sq	2" Sq	3.78	16.20	83.80
2" Sq	1-1/2" Sq	12.66	28.86	71.14
1-1/2" Sq	1" Sq	10.11	38.97	61.03
1" Sq	1/2" Sq	11.43	50.40	49.60
1/2" Sq	1/4" Sq	13.16	63.56	36.44
1/4" Sq	0	36.44	100.00	0.00



Kaitlyn Natelli
Branch Manager

SGS North America Inc. Natural Resources
2035 North Airport Road Huntington UT 84528 t (435) 653-2311 f (435)-653-2436 www.sgs.com/minerals

Member of the SGS Group (Société Générale de Surveillance)

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