

Ky. Division of Mine Permits

Permitting Issues



PEM Aug. 17, 2012

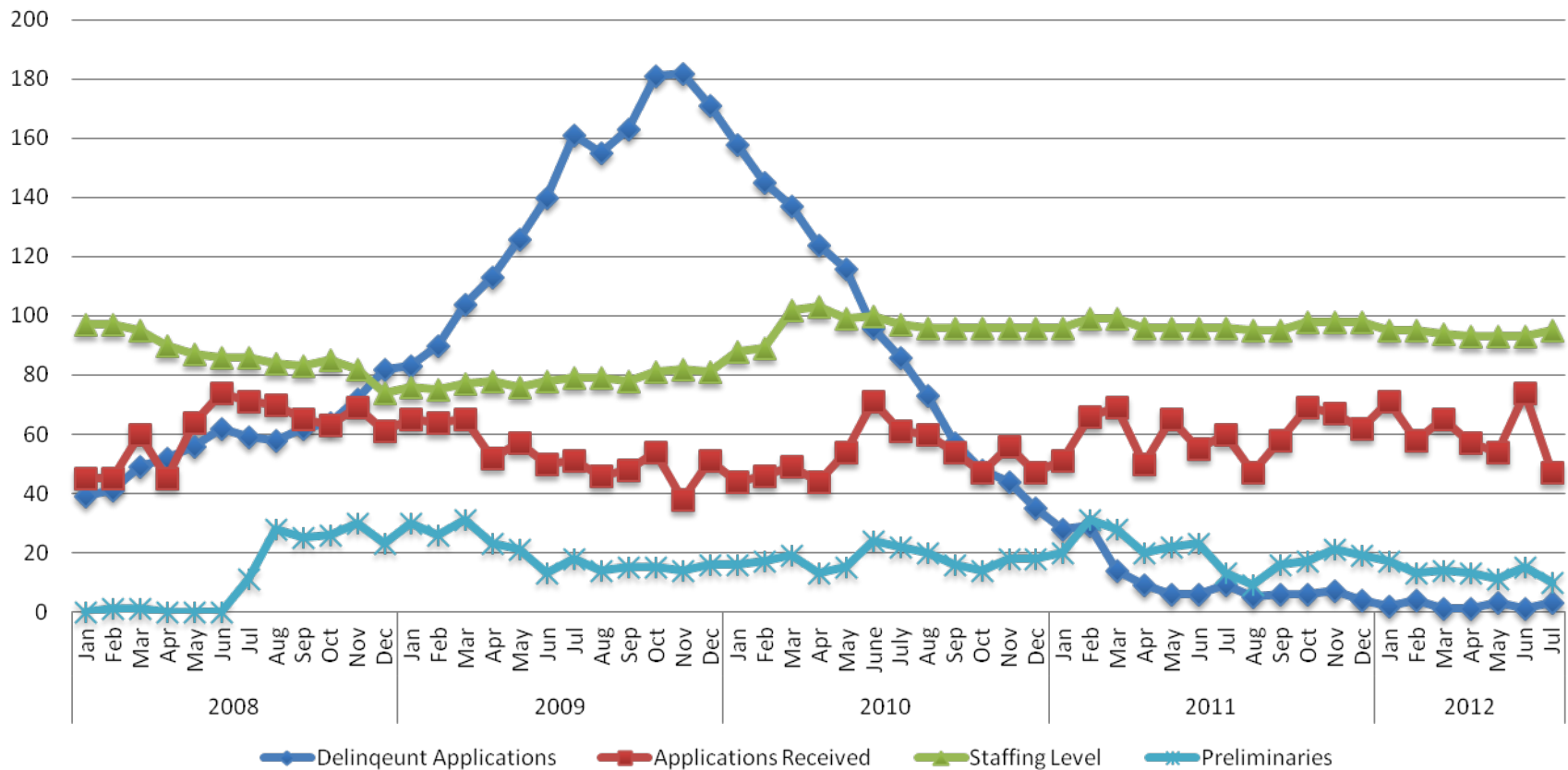
Allen Luttrell



Permitting Trends



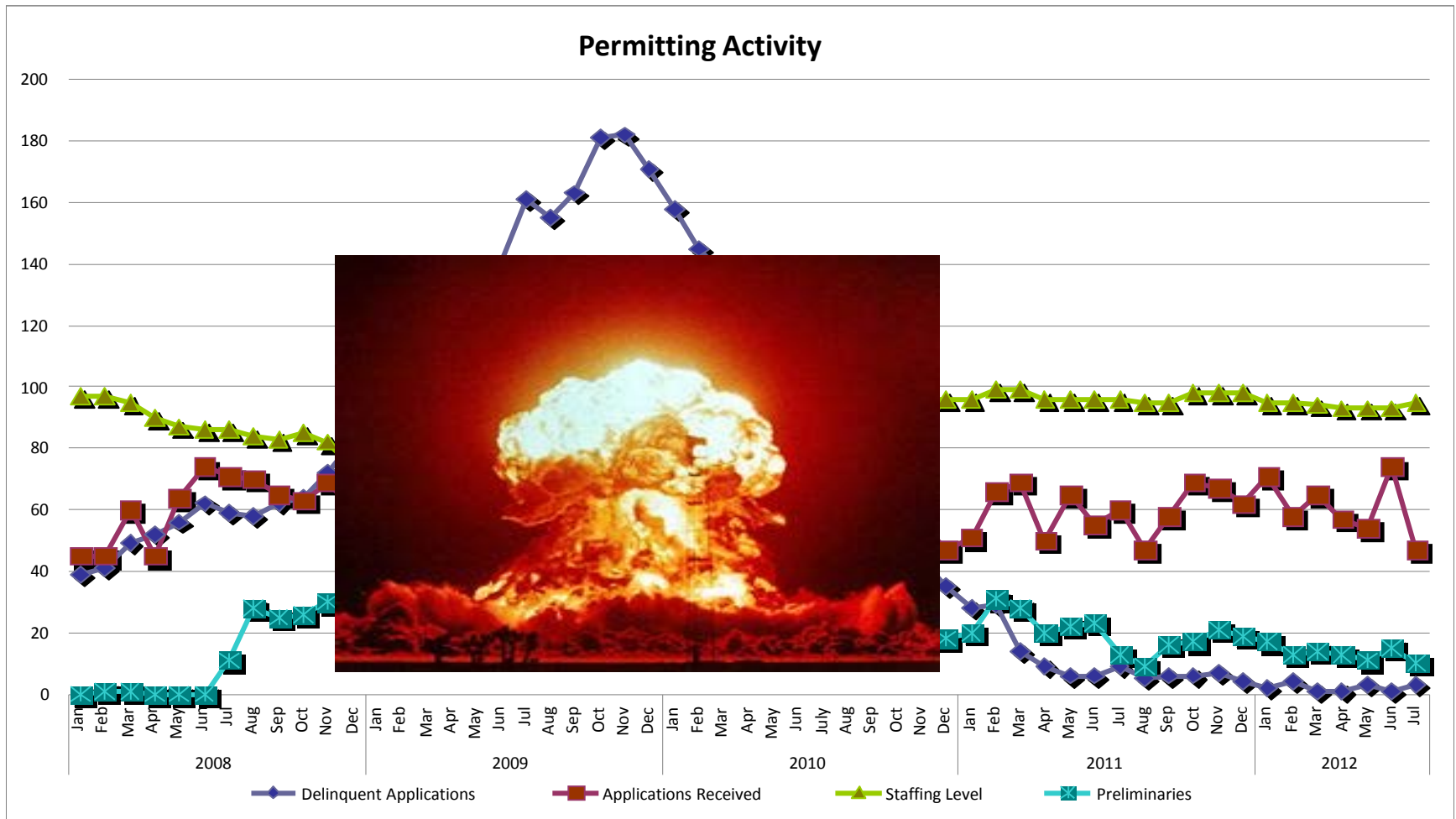
Permitting Activity



Potential Permitting Trends



- Permitting Fees/Staff/TAC/Mid-Terms



Electronic Permitting

RAM 157



Implementation Schedule for Access Application



There will be a transition point sometime next year when all submittals and re-submittals will need to be filed on the Access form. This date will be announced soon.

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- Access forms available on September 1, 2012
 - We are targeting to have all new submittals on the Access forms by January 1, 2013
 - The target for having all new submittals and re-submittals on the Access forms is March 1, 2013

During Outreach for Access Application Training



- Sediment Trenches
- Thick Overburden
- Stability Issues
- Contemporaneous reclamation variances

Sediment Trenches



Thick Overburden



Stability



Contemporaneous Reclamation Variances



- High Sulfates
- Increase Bond
- Increase Reclamation Liability
- Increased potential for reclamation activity with no coal production activity

So, if you are requesting a 10,000 ft. contemporaneous reclamation variance.....

Do you really need a variance from

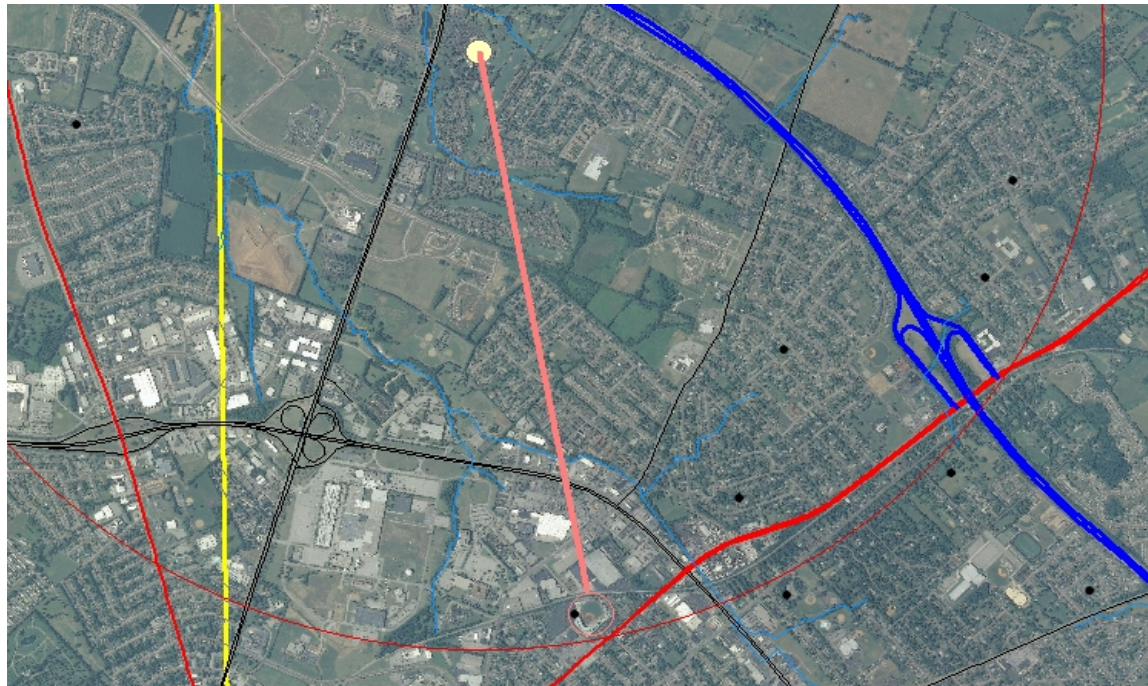


Here



to

Applebee's Park?

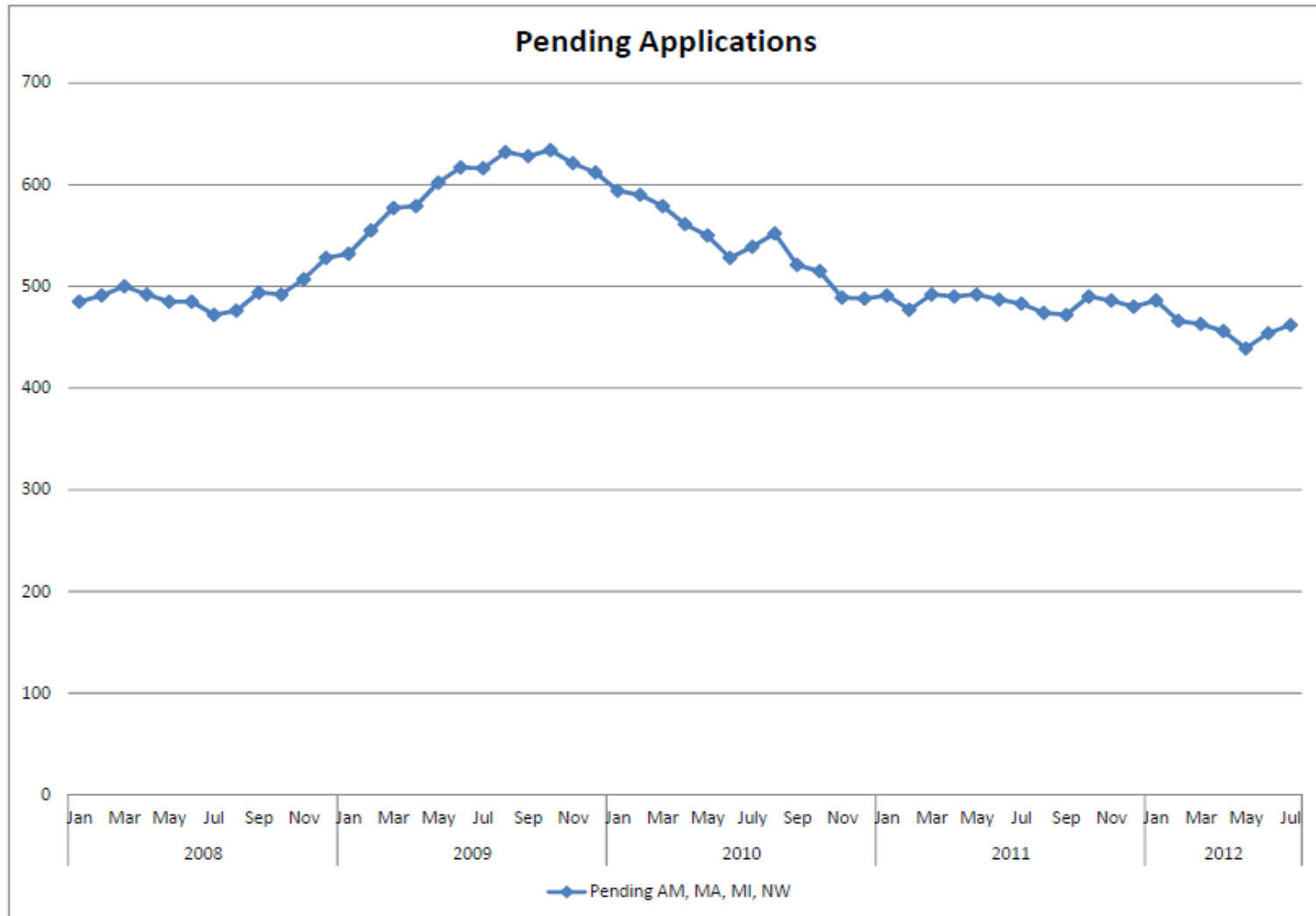


Future Permitting Trends



- A decline in the number of applications submitted for review
- Increasing complexity to accommodate permitting mandates from other affected agencies such as DOW, US ACE, certain EPA mandates, etc.
- Current budgeting trends suggest a possible decrease in staffing for DMP, which will increase the need for efficiency
- Electronic Permitting is one area we hope to utilize better efficiencies.
- If the recent past holds true continued law suits, Land unsuitable petitions and other legal challenges may put additional stresses on our resources.

Trend of Permitting Actions



END

