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August 14, 1996

TO: Joe Helfrich, Inspection and Enforcement Supervisor *JH*
FROM: Wayne H. Western, Senior Reclamation Specialist *WHW*
RE: Amendment, Conveyor Replacement, White Oak Mining and Construction Co., Inc., White Oak Mine #1 and #2/Loadout, Folder #2, ACT/007/001

SYNOPSIS

In a letter addressed to Ken Wyatt, dated August 7, 1996, the Operator proposes removing the high angle gallery conveyor and replacing it with a pair of conveyors that will deposit coal directly into the stacking tube. The Operator also wanted to install underdrains in the sediment disposal area. Ken requested that I evaluate the proposal with respect to the reclamation bond for the conveyors and the drains for the sediment area drain.

Analysis:

Conveyor Belt

The Operator proposes removing the high angle conveyor, S-38, and replacing it with an extension of the No. 2 belt, S-39. The new S-39 extension will move coal from the existing belt to a new belt, S-45, that will move the coal from the stacking tube. As shown on the enclosed drawing a small platform will be excavated in the existing slope on the east side of the lower bench to accommodate the installation of the transfer point and belt drive for the S-45 belt. The excavation will be made in competent rock and have a slope of .25 horizontal to 1 vertical. Material from the cut will be used for regrading the area in the center of the truck loop. The Operator claims that the reclamation bond should not change because of the installation of the new conveyor system.

The proposed conveyor system should reduce the amount of coal that is spilled while transporting the material to the coal silo. The amount of material to be removed from the excavation should not exceed 18 cubic yards. That amount of material is minor and should not affect the mass balance calculations.

The current demolition cost for the high angle conveyor system is \$6572. The new conveyor system should have a minor demolition cost and it is unlikely that the bond would need to be increased at this time.

The Division cannot reduce the bond amount for reclamation work unless the Operator applies for bond release. The Division will not grant bond release for removal of just a conveyor belt in the pad area. The Operator needs to submit an estimate for the demolition and removal cost for the new conveyor system. That estimate must include the dimension of the conveyor system and where the debris will be disposed.

Sediment Area Drain

To prevent the possibility of adverse effects of the seeps along the cut slope of the sediment area a drain system is proposed. The seeps are on the southern end of the pile and are about 200 feet apart. The drain will consist of four inch perforated pipe encased in coarse washed gravel. Initially the drain will be installed from one seep to the other with perforated pipe, and gravel the entire length between the two seeps. The perforated pipes will be connected to a 6-inch diameter pipe that will allow the water collected by the drain system to be routed to the outside of the pile and discharge into ditch D-31. This ditch will carry the water to the mine site sedimentation Pond (004). All pipes will be left in place after reclamation.

The amendment did not include a cross section of the drains or indicates what the slope of the pipes would be. A cross section should be included in the amendment so that the Division can determine if the pipes will be installed correctly.

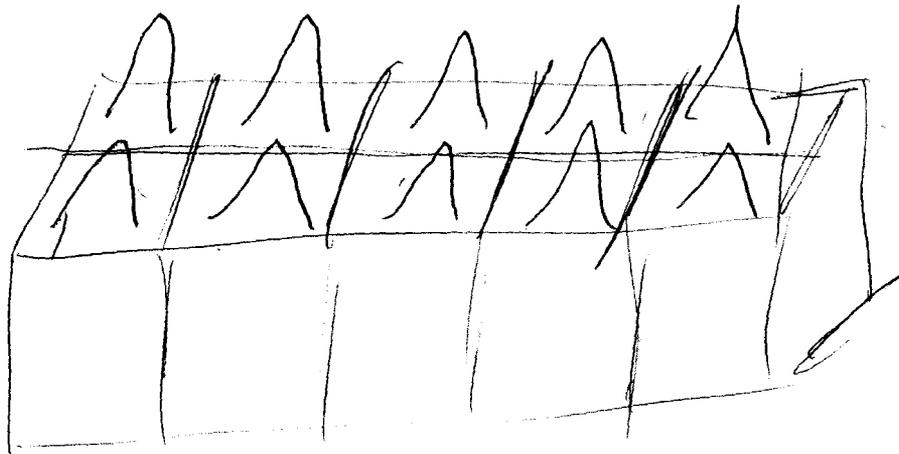
The Division wants to know the slope of the pipes. If the slope is too, gentle flows could be restricted. Should the slope be too great then the flow velocity could cause piping. The Division requests that the slope of the pipes be between ½ percent and 2 percent.

Findings:

Deny the conveyor belt proposal because the Operator failed to meet the conditions of R645-301-830.140 by not providing the Division with detailed reclamation cost information.

Deny the sediment area drain because the Operator failed to meet the conditions of R645-301-535.130 by not demonstrating that the drainage system is compatible with the surrounding conditions. The Operator needs to state what the slope of the pipes will be and provide the Division with a cross section showing the pipes.cc:

D. Haddock
K. Wyatt
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