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DIVISION OF OIL, GAS AND MINING

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February 29, 2000

TO: Internal File

FROM: Mike Suflita, Reclamation Hydrologist, Project Team Lead *ms*

RE: 160-Acre Incidental Boundary Change, Lodestar Energy, Inc., White Oak Mine, ACT/007/001-IBC99F

SUMMARY:

On December 10, 1999 the Division received a request to amend the approved Mining and Reclamation Plan (MRP) to include an additional 160 acres. This action required a lease modification to Federal Coal Lease No. U-017354 which was jointly approved by the Forest Service and Bureau of Land Management on September 29, 1997. The Bureau of Land Management and Forest Service manage the coal and surface resources, respectively. The added coal reserves would extend the life of mine by about five years.

On January 18, 2000 the division responded to the submittal with a Draft Technical Analysis which outlined the areas where the submittal did, and in some instances, did not meet regulatory requirements. On February 15, 2000 the Applicant met with the Division to review and discuss revisions to the amendment. A second submittal was received by the Division on February 17, 2000. This Technical Analysis explains the manner in which the submittal meets the regulatory requirements of the Utah Coal Regulatory Program. Only those elements of the regulations that are relative to this request are included.

TECHNICAL ANALYSIS:

OPERATION PLAN

HYDROLOGIC INFORMATION

Regulatory Reference: 30 CFR Sec. 773.17, 774.13, 784.14, 784.16, 784.29, 817.41, 817.42, 817.43, 817.45, 817.49, 817.56, 817.57; R645-300-140, -300-141, -300-142, -300-143, -300-144, -300-145, -300-146, -300-147, -300-147, -300-148, -301-512, -301-514, -301-521, -301-531, -301-532, -301-533, -301-536, -301-542, -301-720, -301-731, -301-732, -301-733, -301-742, -301-743, -301-750, -301-761, -301-764.

Analysis:

Ground-water monitoring.

The proposed addition is within the Upper Huntington Creek and Mud Creek Basins CHIA. This was determined by comparing CHIA Figure 2 and Plate 7-1, Permit Extension-Surface And Ground Water Rights And Monitoring Points. The CHIA does not need to be revised due to this proposed amendment.

The proposed 160 acre addition is located on the south edge of the present lease area on the west end. The 160 acres is at the headwaters of Coal Canyon, which is a spring-fed stream. Cox Canyon is the stream one mountain ridge to the south, and both streams could potentially be impacted by mining operations. Cox Canyon is also spring-fed. The existing permit area extends to the headwaters area of Cox Canyon. Both streams are shown on the U.S. Geological Survey maps (Candland Mountain Quadrangle) as perennial streams for most of their length. The submitted baseline monitoring data shows flows during all seasons, except one date in November when both streams were frozen.

The area is characterized by perched water tables which have springs issuing on the mountainside. Spring locations are shown on Plate 7-1, Permit Extension-Surface And Ground Water Rights And Monitoring Points. Baseline data in Appendix 722.100d shows a one-time monitoring of 16 springs feeding Cox Canyon and nine springs feeding Coal Canyon. The revised amendment proposes to establish four new monitoring points in addition to those already in the MRP. Monitoring point COAL is near the mouth of Coal Canyon where the stream enters Electric Lake, COX is near the mouth of Cox Creek near where the stream enters Electric Lake, SCOAL-1 is a spring located at the west center of the lease addition, and SCOAL-5 is a spring in the southeast corner of the addition.

Monitoring will begin in 2000 and continue through the Operation phase through the end of reclamation. These monitoring points will be analyzed per Table 731.211A which is the basis for the other monitoring points in the MRP. Compared to the other possible monitoring points, these should best show any potential impacts from mining. The data will be added to Appendix 722.100d.

TECHNICAL MEMO

Analysis of the first submittals water monitoring data showed unexplained discrepancies in the total flows of both Cox and Coal Creeks when compared to the springs which feed these streams. These are detailed in the first Technical Analysis. The Applicant commits (page 700-10) to sampling flow (only) on the streams and all the springs feeding these streams during three quarters of 2000 to continue the baseline analysis. These data will also be added to Appendix 722.100d. Hopefully this will help explain the original discrepancies. Although mining will take place during 2000, the location is far enough from any springs to have a minimal effect.

Findings:

The submittal meets minimum regulatory requirements.

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