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State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

ACT/007/004 #2

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UTAH DIVISION OF OIL, GAS AND MINING
FACSIMILE COVER SHEET

DATE: 5/1/96
FAX # 801-687-2297
ATTN: JOHNNY PAPPAS
COMPANY: CYPRUS PLATEAU
FROM: JOE HELFRICH
DEPARTMENT: _____

NUMBER OF PAGES BEING SENT (INCLUDING THIS ONE): 6

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MESSAGES:

JOHNNY: NEITHER THE CASTLE GATE NOR THE WILLOW CREEK PERMITS CONTAIN APPROVAL FOR THE CONSTRUCTION OF CONVEYORS, A TRANSFER BUILDING AND A PUMPHOUSE AS DESCRIBED IN YOUR PROPOSAL AMENDMENT ACT/007/004-96C. I'M ENCLOSED TWO MEMOS WHICH OUTLINE REMAINING DEFICIENCIES. PLEASE NOTE THAT ACTIVITIES RELEVANT TO THIS AMENDMENT PRIOR TO APPROVAL WILL RESULT IN VIOLATIONS OF BOTH THE WILLOW CREEK AND CASTLE GATE PERMITS. JOE

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April 10, 1996

TO: File

THRU: Joe Helfrich, Inspector Supervisor

FROM: Robert Davidson, Soils Reclamation Specialist *RAD*

RE: Technical Analysis of Permit Modification to Castle Gate Coal Mine, AMAX Coal Company, Castle Gate Mine, ACT/007/004, Folder #2, Carbon County, Utah

SYNOPSIS

AMAX Coal Company is seeking Division approval to amend its surface facilities at the Castle Gate Preparation Plant to include the following:

1. Extension of the conveyor system southward for approximately 310 feet from the existing transfer building.
2. Construction of a new transfer building.
3. Extending the conveyor system south-easterly for approximately 400 feet; and
4. Construction of a new pump house and associated underground water lines.

On March 6, 1996, DOGM's Reclamation Specialist personnel Paul Baker and Robert Davidson, met with AMAX's Environmental Engineer, Johnny Pappas, to discuss and view the proposed conveyor extension and transfer building. By mutual agreement, substitute topsoil will be savaged along the 310 feet of corridor between the existing transfer building and the proposed new transfer building. Because of the close proximity of the conveyor to the ground surface in this corridor, significant surface disturbance will occur during construction to obtain the needed surface grade required for the conveyor.



ENVIRONMENTAL RESOURCE INFORMATION SOILS RESOURCE INFORMATION

Regulatory Reference: 30 CFR Sec. 783.21, 817.200(c); R645-301-222, -223, -233.

Analysis:

All construction activity will take place within existing disturbed areas and soils. General soil resource information for disturbed soils within the Castle Gate Prep area are contained in the Castle Gate permit. However, specific soil resource information for the proposed 310 feet of corridor needs to be collected. Using DOGM's Guidelines for Management of Topsoil and Overburden, the soil resource information should include the approximate depth, type, and quality of recoverable soil resource material.

Findings:

The permittee must provide the following, prior to approval, in accordance with the requirements of:

R645-301-220, Environmental Description and R645-301-233, Topsoil Substitutes and Supplements. Provide an adequate description for the recoverable soil resource, including the results of physical and chemical analyses.

OPERATION PLAN TOPSOIL AND SUBSOIL

Regulatory Reference: 30 CFR Sec.817.22; R645-301-232, -233, -234, -242, -243.

Analysis:

Soil removal operations will be supervised by a qualified reclamation specialist/soils scientist. This approach will assure that all available and suitable soil materials from the disturbance corridor will be salvaged. The salvaged soil material will be located and stockpiled in Crandall Canyon.

Soil salvage by "live-haulage" will help stabilize the topsoil pile during storage, provide abundant organic matter to help maintain soil structure, and ensure an adequate, natural seed bank during storage.

Findings:

The permittee must provide the following, prior to approval, in accordance with the requirements of:

R645-301-234, Topsoil Storage. Materials removed will be stockpiled on a stable site and protected from erosion and contamination by establishment and maintenance of an effective vegetative cover.

RECLAMATION PLAN TOPSOIL AND SUBSOIL

Regulatory Reference: 30 CFR Sec. 817.22; R645-301-232, -233, -234, -242, -243.

Analysis:

Reclamation issues pertaining to soils were not specifically addressed.

Findings:

The permittee must provide the following, prior to approval, in accordance with the requirements of:

R645-301-240, Reclamation Plan. The permit application will include reclamation plans for redistribution of soils, use of soil nutrients and amendments and stabilization of soils.

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April 29, 1996

TO: Joe Helfrich, Inspection and Enforcement Supervisor *Jch*
 FROM: Wayne H. Western, Senior Reclamation Specialist *WHW*
 RE: Castle Gate Preparation Plant Modification 96C, AMAX Coal Company, Castle Gate Mine, ACT/007/004, Folder #2, Carbon County, Utah

SUMMARY

AMAX Coal Company proposes to construct two new conveyors, a transfer building and a pumphouse at the preparation plant. The facilities will be located in an existing disturbed area where runoff report to a sediment pond.

Analysis:

AMAX Coal Company proposes constructing the following surface facilities at the Castle Gate Preparation Plant:

*Covered under Willow Creek Permit OKWH 1.
 OKWH 2.
 OKWH 3.
 unable to determine if cover in W.C. Permit 4.*

1. Extension of the conveyor system southward for approximately 310 feet from the existing transfer building;
2. Construction of a new transfer building;
3. Extending the conveyor system southeasterly for approximately 400 feet;
4. Construction of a new pumphouse and associated underground water lines.

The Surface Facilities Map for the Castle Gate Preparation Plan (Exhibit 3.4-1) has been revised to show the proposed structures. The location of the underground water lines is shown on Figures A and B along with the proposed pumphouse. The location of the new pumphouse has not been completely decided upon, but will be somewhere adjacent to the utility corridor. All activities will take place within the existing disturbed area and where treatment for runoff is already provided. Additionally, the proposed structures will be constructed on land owned and controlled by AMAX.

The underground water lines will be installed within an existing utility corridor, located on the west side of the access road. The possibility also exists that a 3-inch potable water



line may parallel the 6-inch raw water line: this line is not shown on Figures A or B. Drawings will be revised accordingly and submitted to the Division.

The proposed structures will increase the reclamation bond cost by \$34,266 as shown on the enclosed summary sheet. Included herewith is an updated rider to our bond for \$6,757,451. The Division has determined reclamation costs for the conveyor belts and transfer building to be \$61,286. Because the increase in the reclamation cost is less than 5% of the bond amount, the Division does not require the bond to be increased at this time.

None of the maps or plans for the conveyors, transfer building water lines or pumphouse was certified as required by R645-301-512.120. The Permittee did not update other maps, such as Exhibit 3.4-2 and Exhibit 3.4-2A, that show the location of surface facilities.

In accordance with R645-301-521.122 all manmade structures must be shown on the surface facilities map. The Permittee did not show the location of the pumphouse on the surface facilities map, because he has not yet determined where the structure will be located. Approval for constructing the pumphouse cannot be given until its location is known.

Findings:

The Division cannot approve the construction of the conveyor belts and transfer house because the Permittee did not have the surface facilities maps certified as required by R645-301-512.120 and by not showing the location of the structures on all relevant maps as required by R645-301-521.122.

The Division cannot approve the construction of the pumphouse and the installation of the water lines because they are not shown on the surface facilities maps as required by R645-301-521.122.

RECOMMENDATIONS

1. Deny the Permittee's request for construction of the conveyors and transfer building, because the maps were not certified and the locations of the structures were not shown on all relevant maps.
2. Deny the Permittee's request to construct the pumphouse and install water lines, because location for the structures has not been determined.