

June 10, 1985

TO: Coal File, Inspection and Enforcement Folder
FROM: Sandy Pruitt, Mining Field Specialist *SP*
RE: Skyline Mine, Utah Fuel Company, ACT/007/005, Folder #7,
Carbon County, Utah

A partial inspection of the Skyline Mine was conducted by Sandy Pruitt, accompanied by Keith Zobell, on May 24, 1985. This inspection was partly in follow-up to a concern raised during a May 16, 1985 inspection. Upon review of the approved plans for the open coal storage area it became apparent that enforcement action was warranted by observations made at that time. The height of the temporary stockpile at Area 2 was up to 15 feet above the RDA road so that the toe of the stockpile rested on the road shoulder. According to the approved plans, the stockpile in Area 2 is to be developed "up to the level of the RDA road", this is also indicated on the typical cross section for Area 2 on Map 3-6B. There were no designs for a drainage control ditch between the stockpile and the RDA road, as runoff was to be contained by the road itself. NOV #1 of 2, N85-2-7-2 was issued, as a result of this inspection, for the failure to conduct coal mining activities in compliance with the terms and conditions of the permit, UMC 771.19. The remedial action required by NOV #1 of 2 is compliance with the approved plans or obtain DOGM approval of as-built plans for the stockpile area within two weeks of receipt of the NOV, or by June 20, 1985.

The approved plans also state that the open coal storage area will be posted as a restricted area and to prohibit open flame near the stockpile in order to eliminate fire hazards. Keith Zobell, presented a purchase order, dated May 23, 1985, for the signs and questioned DOGM authority to require the signs. Mr. Zobell should refer to UCA 40-10-18(2)(h) which requires that each permit require the operator to eliminate fire hazards. UMC 817.97 (d)(8) requires that mining activities be conducted to prevent and control coal fires to the extent possible. Irregardless, UMC 771.19 requires compliance with the terms and conditions of the mining and reclamation permit. If there is any question of DOGM authority for any requirements and conditions made for a mining permit, the issue must be resolved before the permit is granted and effectively committed to.

Prior to this inspection, on the afternoon of May 23, 1985, the Scofield Waste Rock disposal site was inspected. A sign identifying the MSHA permit number has been posted at the waste rock disposal pit. Utah Fuel is required to post a mine identification sign at the entrance to the waste rock disposal pit in accordance with UCA 40-10-19(4) and UMC 817.11(c). A variance to these requirements must be obtained from DOGM if Utah Fuel does not intend to post the mine identification sign as required. A modification to the approved mine plan was requested, to post signs with smaller lettering than that specified. DOGM approval of this modification was granted on May 30, 1985.

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The approved plans for the waste rock disposal site commit to the installation of a gate at the entrance to the pit. Keith Zobell contends that since there are two locked gates along the access at the beginning of the private road to the pit, a third gate is not necessary to restrict access to the pit. This is valid, but the approved plans must be modified to insure compliance with UMC 771.19

Utah Fuel has begun placing waste in the pit as of April, 1985. The material contains a high percentage of coal and some material appears to be snow residue from the mine yard. The west end of the pit, where most of the material was dumped, had been graded (evident by cat tracks). The wall of the pit adjacent to the waste material had vegetation on it. It was not as readily apparent that a 3 foot compacted barrier had been placed along the walls of the pit as designed. Keith Zobell indicated that the barrier material was placed in the pit in October of 1984. He could not provide a certified report of an inspection conducted by a professional during compaction of the noncombustible fill material which would indicate whether the barrier was constructed to the approved designs. This is a requirement of UMC 817.71(i), which was also committed to in the approved plans. NOV #2 of 2, N85-2-7-2 was warranted for the failure to inspect the rock waste disposal site to provide a certified report that the fill has been constructed as specified in the approved designs and failure to comply with terms and conditions of the mine permit UMC 817.71 (i), UMC 771.19.

For abatement of NOV #2 of 2, Utah Fuel must provide information to DOGM as necessary to verify that the initial configuration of the fill area was constructed as specified in the approved designs. The information must be provided within two weeks of receipt of the NOV or by June 20, 1985. Inspections must be conducted by a qualified professional during the first critical construction period listed under UMC 817.71 (i) or no later than June 30, 1985 to meet the quarterly inspection requirement, whichever comes first.

Cracks detected in the walls of the disposal pit at three locations released smoke from the adjacent underground mine fire. These vent holes are not indicated in the proposed plans for the waste rock disposal pit. Due to this immediate connection to the mine fire in the UP coal seams and since there is an exposed coal seam on the opposite side of the pit, the three foot barrier along the wall of the pit and two foot barrier along the floor may not be adequate to prevent ignition of the coal in the waste rock pit, which may be 20 or 30 percent by content as approved. Keith Zobell indicated that Utah Fuel was aware of the vent holes and believed that the barrier

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dimensions were sufficient. George Kensey, who originated the permit, could not be located during this inspection. Upon my return to the DOGM office, I explained my concern to John Whitehead, Sue Linner, Pam Grubaugh-Littig and Randy Harden, and requested that they arrange an inspection as soon as possible. Keith Zobell determined that the first lift of the waste rock fill would not be compacted for another month.

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cc: Donna Griffin, OSM
Keith Zobell, Utah Fuel
Randy Harden, DOGM
Joe Helfrich, DOGM
Sue Linner, DOGM
Pam Grubaugh-Littig, DOGM
John Whitehead, DOGM

Statistics: See Belina Mine memo dated June 7, 1985.
0242Q-22-24