



# State of Utah

DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF OIL, GAS AND MINING

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November 21, 1988

TO: Sue Linner, Permit Supervisor

FROM: Randy Harden, Reclamation Engineer *JRH*

RE: Five-Year Permit Renewal Review, Utah Fuel Company,  
Skyline Mine, ACT/007/004, Folder #2, Carbon County,  
Utah 5

The following comments are in regard to the five-year permit renewal submittal information received by the Division on November 1, 1988 from Utah Fuel Company:

UMC 783.22 Land Use Information - JRH

The operator has revised section 4.12.2 page 4-61 of the MRP to address previous comments on this section.

Within the text of the MRP, the operator has sufficiently responded to the requirements of this section. However, details and delineation of the final reclamation of the site with regard to facilities left for post-mining land use are not clear.

Maps and plans presented in the plan do not provide specific details as to the reclamation treatments within the permit area. The reclamation drawings should clearly delineate areas not to be revegetated, roads to be left as part of the post-mining land use, extent and description of pads or other facilities to be left in conjunction with the post-mining land use.

For example, the loadout facilities reclamation maps should clearly indicate that the approaches from the roads will remain, provide the extent of the area not to be revegetated in anticipated of corral areas. Will the pre-mining corrals be reconstructed as part of this post mining land use? Those areas which are to be completely reclaimed should be delineated to indicate the acreage requirements for topsoil distribution and revegetation, as well as other reclamation treatments that may be required.

The maps and drawing utilized for Phase I and Phase II reclamation must sufficiently show all the aspects of reclamation including determination of quantities for bonding calculations, delineation of the areas for each specific post-mining land use, and determination of the acceptability of the proposed post-mining land use.

While this section of the regulations could be considered complete, other aspects involved in the reclamation plan may need further consideration.

UMC 784.13 Reclamation Plan: General Requirements - JRH

Although portions of this section were addressed in the November response, detailed review of the requirements of this section cannot be made until such information as is required in the December submittal is presented to the Division for review. Comments on most of this section will be deferred until that time.

With regard to map 3.2.3-3, conveyor route permit boundary, additional information will be required. The map does not indicate the total acreage or acreages for these areas. More detailed maps of each area(s) will need to be provided in order to determine reclaimability of the sites and detail specific reclamation treatments. The areas are also non-continuous and do not take into consideration disturbance that has or may be caused from access requirements for equipment needed for construction and reclamation of those areas. Detailed plans for these areas should be submitted in consideration of final reclamation of the conveyor route.

UMC 784.16 Reclamation Plan: Ponds, Impoundments, Banks, Dams and Embankments - JRH

The operator has indicated in the text of the MRP that the pond at the mine facilities area will be reclaimed upon reclamation and has corrected conflicts within the text indicating that it was to be left as part of the post-mining configuration. This clarifies the situation, however, detailed plans for Phase I and Phase II reclamation in conjunction with the use and the removal of the pond at that time will have to be addressed in the plan.

UMC 784.19 Underground Development Waste - JRH

The operator appears to have addressed the Division's concerns regarding the requirements within the text of the MRP. Determination as to the suitability of the design for final reclamation will be made upon receipt of the December submittal. However, the operator's indication that the material is to be placed in three to four foot lifts for compaction is not acceptable. This section on page 4-74A should be revised to place material in one to two foot lifts for compaction in accordance with standards recommended within the regulations and during normal construction practices.

UMC 817.101 Backfilling and Grading: General Requirements - JRH

The operator has included in the plan, a mass balance calculation in section 4.4.2 of the MRP.

The mass balance information referred to by the operator is the summary information included in the bonding calculations with hand calculations presented as appendicies. The hand calculations provided by the operator are not clear as to the maps from which the information was derived, or the locations in which the cross sections were taken. Map reference and indication of the locations of the cross sections used to generate the cut and fill requirements should be presented in the plan.

The information presented in the calculations does not present sufficient information to determine that there is a mass balance in the backfilling and grading requirements for the reclamation plan. The operator need to provide sufficient contour detail and cross sections and volume calculations to indicate that there is indeed a mass balance for the backfilling and grading requirements at the site. These backfilling and grading calculations will require that the amount of material required, or excess, be determined for general fill material, excess spoils and mine development waste, topsoil material, and waste materials to be disposed of on site. Please provide more sufficient detail so that this determination can be accomplished for the plan.

The operator has committed to conduct geo-technical investigation of slopes in excess of 2:1 in conjunction with the design of the site for final reclamation. In order to determine the reclaimability of the site and the cost estimation for reclamation, more specific details involved with reclamation will have to be provided by the operator. Revisions to the plans for reclamation could vary considerably depending on the stability of the site and affect those costs involved in reclamation.

The surface facilities established in conjunction with the mining operations are static in a sense that little change in the shape and contour of the surface will occur throughout the life of the mine. The operator should accordingly, be able to provide detailed design specifications, drawings and plans for the reclamation of the site. Such detail will afford the Division the capability of determination of reclaimability of the site.

UMC 817.150-.176 Roads - JRH

The operator has indicated that permits have been required and approved by UDOT and the Forest Service in conjunction with the construction, maintenance, and reclamation of roads. The operator also has indicated a close working relationship with these agencies for maintenance and snow removal on such roads.

As indicated in comments by the operator under UMC 784.18, as request for a jurisdictional agreements between UDOT and the USFS, Manti-LaSal Forest, for the transfer of Forest Development Road 50227 has been requested and will be included in the MRP when received.

Requirements for inclusion of access roads to various facilities used in conjunction with surface mining activities is to be addressed by the operator in the December 1, 1988 submittal. However, indication by the operator that some of these roads will not fall under the jurisdiction of the Division is considered to be incorrect.

A recent Ten-Day-Notice from the Office of Surface Mining was issued regarding mining facilities, access roads, and approaches constructed within highway and public road right-of-ways. Basically, although the facilities were within the right-of-way and under the jurisdiction of UDOT, the facilities are still considered to be under the jurisdiction of the Division and that the permit area, and affected area must include them. Where an approach or access road enters such a right-of-way the permit boundary shall extend to the road to a point where the adjoining road has not be affected by the surface mining activities.

Reclamation liability still exists for these facilities regardless of whether or not they are to be reclaimed in conjunction with post-mining land use. Bonding costs may be affected by specific reclamation treatments required for such facilities. In the event that the approach is to be removed in conjunction with reclamation, costs associated with the removal of the structure and re-establishment of drainage through the area, and revegetation requirements must be incorporated into the plan. In the event that the structure is to remain, design criteria for suitability of the structure must be included in the plan, and any modifications if necessary for the facility to remain as part of post-mining land use. All of this, of course, must be made in consideration with permit requirements of UDOT and the Forest Service.

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Pre-existing structures are not exempt in all cases from the design standards for road construction. In the event that the structure does not meet the performance standards for operation, the operator must modify the structure to meet both the design and the performance standard as required under Subchapter K of the regulations. This comment is made in regard to those comments under roads made by the operator that portions of the regulations were exempt from the requirements of the operator since the road existed prior to mining activity.

BT/11/53-57