

0021



STATE OF UTAH
NATURAL RESOURCES
Oil, Gas & Mining

ACT/007/005
File # 2

Norman H. Bangert, Governor
Dee C. Hansen, Executive Director
Dianne R. Nielson, Ph.D., Division Director

355 W. North Temple • 3 Triad Center • Suite 350 • Salt Lake City, UT 84180-1203 • 801-538-5340

April 4, 1988

TO: File

FROM: Randy Harden, Reclamation Engineer *JRH.*

RE: Five-Year Permit Renewal Review, Utah Fuel Company, Skyline Mine, ACT/007/005, Folder 2, Carbon County, Utah

The following comments are to be included in the five-year permit renewal of the Skyline Mine plan:

UMC 782.18 Personal Injury and Property Damage Insurance Information - JRH

This section is considered to be complete.

The operator has supplied to the Division, a current certificate of liability insurance which expires on January 1, 1989. However, as of the date of this review, the operator has not supplied the new form for liability insurance as requested by the Division, and due on January 31, 1988.

UMC 783.12 General Environmental Resource Information - JRH

With respect to part (a) of this regulation, this section is considered to be complete. The operator has provided a narrative description of the mining methods to be used and the sequence and timing of mining operations.

The sequence and timing of the mining operations for the permit term, shown on drawings 3.3-1 and 3.3-2, project the five-year sequence for underground mining operations.

UMC 783.22 Land-Use Information - JRH

It is not clear in the Mining and Reclamation Plan (MRP) whether or not the post-mining land use has been clearly

determined. The operator has proposed to leave some of the pad areas at the mine facilities as part of the post-mining land use. From the drawings and plans provided, the precise function and use of these pad areas is not clear. Additionally, the determination of land use in conjunction with the requirements of the USFS and their approval is not clear in the MRP.

The operator has provided pre-mining land use information and intends on restoring the area (to the extent as is possible) to pre-mining land use conditions.

Post-reclamation drawings presented in the MRP do not clearly depict facilities or surface features which are to remain. Perhaps a more concise description in the reclamation plan, as well as more descriptive information in the drawings, would benefit the information needed regarding post-mining land use.

UMC 783.24-25 Maps: General Requirements, Cross Sections, Maps, and Plans - JRH

This section is not considered to be complete.

Mine maps of the detail and scale as required under 30 CFR 775.1200 need to be provided and included in the MRP. These MSHA maps provide much of the information that is required under this section, as well as information required under the performance standard. Due to the nature of the information provided on these drawings, the operator may request that these drawings be placed in the confidential portion of the MRP. Additionally, annual updates of these mine maps shall be submitted with the annual reports, as required by the Division.

UMC 784.11 Operation Plan: General Requirements - JRH

This section is considered to be complete.

The operator has provided a narrative description of the type and method of coal mining. This information can be found in part 3.1 of the MRP.

Parts 3.2, and sections in part 4, describe the construction, maintenance, use, and reclamation of the facilities to be constructed on the mine site.

UMC 784.12 Operation Plan: Existing Structures - JRH

There were no previously existing structures utilized within the permit area for coal mining activities. This section is not applicable to the operator's MRP.

UMC 784.13 Reclamation Plan: General Requirements - JRH

The operator has provided a timetable for reclamation. However, some of the steps involved in the reclamation of the site are not clear. Drawings provided by the operator indicate that the sediment pond at the mine facilities area is to be left as part of the final reclamation. Part 3.2.6 of the MRP indicates that the pond will be left permanently as part of the post-mining land use. Other portions of the MRP, including the reclamation timetable and the bonding calculations, indicate that the sediment pond is to be removed.

The detailed timetable provided by the operator should more closely reflect the logical sequence of the reclamation work to be accomplished. Emphasis should be made as to which activities are Phase I or Phase II reclamation work. The reclaimed acres provided with the timetable are intermixed with contemporaneous reclamation work. A more precise breakdown of the acreages involved should be included in the reclamation plan.

In conjunction with the bonding cost estimate and the reclamation timetable, a map(s) would be beneficial to locate and key the specific reclamation activities to be accomplished. This map would also clarify and specify the location and the extent of the work to be done during Phase I and Phase II reclamation.

Facilities that were constructed in conjunction with the mining operation are not included in the permit and disturbed area boundaries. These facilities include the overland conveyor system, well houses, water tank, and the access road to the waste rock disposal facilities. These facilities need to be incorporated into the MRP in order to determine this section complete.

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

Conflicting information is found within the plan as to whether or not the sediment pond at the mine facilities area is to remain as part of the post-mining land use. If it is the intent of the operator to allow the sediment pond to remain as part of the post-mining land use, more specific plans (and approval from the USFS) must be incorporated into the plan.

Embankments which are to remain must be shown to be stable. In the event that the slope is greater than 2h:1v, a geotechnical analysis of the slope should be made.

UMC 784.18 Relocation or Use of Public Roads - JRH

This section is not considered to be complete.

No information could be found in the text of the MRP discussing the right-of-way or use of public roads. The redesignation of the road to the mine site as a state road, and the conducting of mining activities within 100 feet of the public road, should be addressed in the mine plan.

UMC 784.19 Underground Development Waste - JRH

The operator has not clearly located and determined the final disposition of the underground development waste to remain at the unit train loadout area. The operator must conduct a seep and spring survey in the immediate vicinity of the area in which the waste material is to be permanently placed. Cross sections provided for the final reclamation of the rail loadout area do not define the location and the amount of the waste material to be located there. The operator must demonstrate that the permanent waste disposal site does not affect surface or ground water. Materials should be placed above the highest groundwater level anticipated for the area and should be located out of and above the 100-year flood plain for the stream channel. Methodology for placement, compaction, and cover material requirements should also be addressed. Information for the disposal of waste materials at the railroad loadout facilities should be similar to those described for the waste rock disposal facility at Scofield. The plan shall also include a schedule and capacity for the waste materials to be disposed of, in addition to suitable plan and cross sections of the waste disposal sites.

UMC 784.23 Operation Plan: Maps and Plans - JRH

Some of the design drawings and plans found within the MRP do not bear the mark of a registered professional engineer, as required. Please double-check and resubmit those drawings and plans which require certification.

The undisturbed drainages and ditches along the southern end of the unit train loadout (drawing 3.2.1-3) are not clearly shown. Additionally, the diversions and the ditches on all of the drawings should be numbered and clearly marked in order to reference them to the text and the design calculation for those structures.

UMC 784.24 Transportation Facilities - JRH

In part 4.20.2, the operator provides a brief description of the proposed overland conveyor belt. Although reference is made to parts 4.4, 4.5, 4.6 and 4.7 regarding reclamation of the facility, more specific information must be provided. First, the operator needs to provide detailed drawings showing the location and the extent (acreage) of the overland conveyor system. The disturbed

areas need to be identified; and, sediment and erosion control during operational life of the belt line needs to be incorporated into the plan. The reclamation plan portion for the conveyor bench should also include a determination of the stability of the benches, backfilling and grading plan, and the final surface configuration of the benches. The lower third of the conveyor, which is installed on towers, should also include any access or construction roads which may be required for the construction of the facility. In the event that the completion of the overland conveyor system is not to be completed during this permit term, the operator shall, at a minimum, provide for the reclamation plan for those areas already disturbed.

The operator indicates in part 4.20.3 that a detailed plan for the construction and reclamation of the rail spur was submitted to the regulatory authority. This information was not found within the MRP. The operator shall include the operation and reclamation plan for the rail spur and include either a reference to the mentioned plan or incorporate that plan into Chapter 3 of the MRP.

UMC 784.25 Return of Coal Processing Waste To Underground Workings
- JRH

The operator does not intend to return coal processing waste to underground workings. This section is not considered to be applicable to the MRP for the Skyline Mine.

UMC 817.46 Hydrologic Balance: Sedimentation Ponds - JRH

The operator has provided sufficient engineering analysis in the engineering calculations in order to ensure that the loadout sediment pond embankment and the portal sediment pond meet the requirements of this section. Although the loadout sediment pond does not meet the 5:1 combined inslope and outslope criteria as set forth in this section, the stability analysis ensures that the operator is in compliance with the intent of this section and a variance from this section is approved.

UMC 817.61-68 Use of Explosives - JRH

Part 4.8.3 of the MRP indicates the requirements and the design and location of explosives magazines located on the site. The operator has described the intended use or application of the explosives to be used within the permit area. The location of the powder and primer magazines is located on Map 3.2.1-1.

UMC 817.71 Disposal of Excess Spoil and Underground Development
Waste: General Requirements - JRH

Refer to comments under UMC 784.19.

UMC 817.89 Disposal of Non-Coal Wastes - JRH

Non-coal waste materials are collected along a retaining wall to the southwest of the mine office building. These materials are sorted and collected in waste hoppers for removal to the county landfill. The location of these facilities is provided on map 3.2.1-1. The operator is considered to be in compliance with the requirements of this section.

UMC 817.99 Slides and Other Damage - JRH

In part 4.8.5 of the MRP, the operator has committed to report any slides or other damages to the Division. This section is considered to be technically adequate.

UMC 817.101 Backfilling and Grading: General Requirements - JRH

The operator has indicated in part 4.4 of the MRP that the site will not be returned to approximate original contour due to the selected post-mining land use and the stability of the existing slopes. Map 4.4.2-1B, Reclamation Cross Sections, shows that the highwalls and cut slopes for the facilities will, for the most part, be reduced to 2h:1v slopes utilizing fill material along the base of the highwalls and cuts. In addition to this conflict in the plan, the operator has not provided a mass balance of the cut and fill operations required for reclamation. The cost estimate for reclamation indicates a quantity of earthwork to be performed for each specific area but no calculations or design criteria are included in the MRP.

Map 4.7.2-2 has been provided to show the final reclamation and revegetation for the railroad loadout facility. Reclamation contours provided on that drawing show that surface grading is planned for areas outside of the disturbed area boundary. Reclamation contours should be made to match the undisturbed area contours at or within the disturbed area boundaries. Also, this drawing does not indicate that the dump loop, fill and culvert crossing of Eccles Creek will be removed. The bonding calculations provide for the removal of the pavement and earth berms in this portion of the plan, although jersey barriers have replaced the earth berms.

The operator needs to more clearly detail those structures and facilities which are to remain as part of the post-mining land use. Final grading and contour information should reflect the total amount of earthwork to be accomplished. Borrow areas and other areas which are currently not disturbed (but which may be, through reclamation activity), should be incorporated into the disturbed area boundaries. It is also recommended that the disturbed area boundaries be increased where required to allow for equipment access.

UMC 817.150-156 Class I Roads - JRH
UMC 817.160-166 Class II Roads - JRH
UMC 817.170-176 Class III Roads - JRH

The operator has not clearly determined the extent or use of the access road to the waste rock disposal area. It is assumed at this time that the previously existing road to the waste rock disposal site was a private road. Inasmuch as the operator has profiled and upgraded the road to be in compliance with UMC 817.160, Class II Road standards, the operator must determine and justify why the road was not included as part of the disturbed areas used in conjunction with mining activities. Because the road was previously established and post-mining land use clearly calls for the need of the road, the improvement of the road and approval for the road as part of the post-mining land use is warranted. However, the operational function and the use of the road in conjunction with mining activities indicate that this road should be incorporated into the permit area and into the disturbed area boundaries for the Skyline Mine. MSHA requirements, including the installation of guardrails along this road, indicate that MSHA has also incorporated this area into Skyline Mine's mining operations.

The operator shall be required to incorporate into the mining permit area and the disturbed area, the access road to the waste rock disposal facility, or, shall justify and show to the satisfaction of the Division, why the road should be excluded from the plan.

The operator has identified and categorized roads within the permit area and those other roads which are used in conjunction with mining operations. A description of the roads, their use, design and maintenance, is found in part 4.2 of the MRP. Reclamation of the roads has been incorporated into the MRP.

The operator needs to provide proof that they have easement for the construction and use of roads turning off of public roads. Additionally, the operator shall indicate the plans for reclamation or post-mining use of these roads if they are to remain.

UMC 817.180 Other Transportation Facilities - JRH

A description of transportation facilities used in conjunction with the mining operations is described in part 4.21 of the MRP. Measures used to protect the environment are discussed in this section. Revegetation of these facilities has been incorporated into the revegetation plan, part 4.7. Access roads and other transportation facilities shall be reclaimed and revegetated in accordance with the plans as proposed for each respective area. With the exception of some of the drainage designs and culverts, this section is considered to be complete.

UMC 817.181 Support Facilities and Utility Installations - JRH

A description of support facilities and utility installations is found in part 3.2 of the MRP. The information provided in the plan is considered to be sufficient in order to determine this section technically adequate.

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cc: B Team