

0030



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

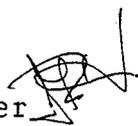
State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203
801-538-5340

March 13, 1989

TO: Sue Linner, Permit Supervisor

FROM: Randy Harden, Reclamation Engineer 

RE: Stipulation Review, South Fork Portal Breakout Facilities, Utah Fuel Company, Skyline Mine, ACT/007/005, Folder #2, Carbon County, Utah

The following comments are in regard to the as-built revisions received January 30, 1989 in response to stipulations for the South Fork Portal Breakout facilities at Utah Fuel Company:

Stipulation UMC 817.101-(1)-JRH

The operator shall be required to revise the mining and reclamation plan to incorporate those sections of the South Fork Access Road and the slash area to be utilized as a borrow area for the portal breakout into the disturbed area boundaries for the permit. The operator shall submit revised drawings incorporating these facilities into the plan and modify the mining and reclamation plan to include this area. Inclusion of these facilities shall be accomplished in conjunction with the five-year permit review and shall be submitted to the Division with information required by the November 1, 1988 deadline.

RESPONSE:

The operator has revised the MRP pages and Map No. 3.2.11-1 in response to the above stipulation.

Map No. 3.2.11-1 has been revised to include the South Fork Access Road and the slash area within the disturbed area boundaries. The operator is considered to have adequately responded to the requirements of this stipulation.

The operator needs to submit 14 copies of the complete plans for the South Fork Portal Breakout to be incorporated into the Mining and Reclamation Plan, including design, hydrologic calculations, revised pages of the MRP, and as-built drawings of the facilities.

BT/11/73



State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

Norman H. Bangarter
Governor

Dee C. Hansen
Executive Director

Dianne R. Nielson, Ph.D.
Division Director

355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203
801-538-5340

March 2, 1989

TO: Sue Linner, Permit Supervisor

FROM: Randy Harden, Reclamation Engineer
Rick Summers, Reclamation Hydrologist

RE: Skyline Site Meeting, Utah Fuel Company, Skyline Mine,
ACT/007/005, Folder #2, Carbon County, Utah

The following comments are in regard to the site visit held on February 21-24, 1989 at the Skyline Mine. Comments provided below are intended to more reflect the opinion of the consideration of the operator with respect to deficiencies noted in the five year permit renewal. It should be noted that several major technical issues outstanding in the permit review were resolved as a result of this site meeting and that Skyline was fully cooperative in helping to resolve those issues. Comments regarding technical deficiencies will be provided upon technical review of Skyline's next submittal.

With regard to the anticipated time for Skyline to complete their response to those technical deficiencies which were resolved during this site visit, it is apparent that the current submittal schedule for Skyline is not sufficient. Details on the engineering and hydrologic designs, plans, and drawings that the operator will be submitting to the Division will require a significant amount of time for preparation on the part of Skyline.

Details regarding the size and the capacity of undisturbed diversions at the portal area, sediment pond capacity and mine water treatment may be revised in early June when the mine operations personnel will make a decision on a potential in-mine treatment sump for the mine water. If the in-mine treatment sump is developed, the mine water could be treated in the sump and discharged to the sediment pond. This could allow additional volume in the pond for surface runoff and the undisturbed diversions could be eliminated from the plan.

As an avenue to approve a plan in a shorter timeframe, the details regarding the undisturbed diversions and pond designs currently in the plan could be addressed and the diversion/pond/mine water system be approved as status quo. The applicant could then submit a revision to the plan in June based upon: 1) the decision to develop the sump or 2) surveyed as-built configurations of the undisturbed diversions conducted when conditions allow surveying work on the surface. Therefore, our options are: 1) a stipulation on the diversion/pond/mine water system to be addressed in June, or 2) response to the deficiencies in the plan which could be accomplished in approximately 6-8 weeks. A meeting is tentatively scheduled for the week of March 6 - 10 at the Division offices with Gary Taylor to complete peak flow calculations, channel designs, and operation drainage maps. It is expected this will be accomplished in two days or less.

Based on these constraints, as well as resolving the deficiencies listed below, the Division should expect a finalized submittal from Skyline near the end of June. Items regarding the reclamation plan, operation drainage plan, post-mining land use, small area exemptions, waste rock road drainage and sediment control could be addressed in the next couple of months depending upon the manpower Utah Fuel Co. dedicates to the project. The actual due date for these data should be discussed with Skyline and determined based upon available mine resources and Division urgency for issuance of a permit. Based upon our meeting, it appeared as if the majority of the work will be done by Gary Taylor. The mapping work to be done is extensive and may require Mr. Taylor approximately two months to complete (Division estimate).

Listed below are those issues which could not effectively be resolved during the course of the site visit. Skyline and the Division acknowledge that these issues will require an additional meeting between the operator and the Division as well as concurrence by the Forest Service prior to final approval of the five year permit renewal.

1. Permit Areas - The operator disagrees that certain facilities involved in surface mining activities should be incorporated into the permit and disturbed area boundaries. These areas include the access roads and approaches to State Road 247, the well houses (3), facilities within the UDOT right-of-way, and the water tank area. The operator concludes that these areas are under the jurisdiction of UDOT and the USFS and are 'permitted' by approvals and permits from those agencies and are not within the jurisdiction of the Division.
2. Subsidence Protection - The operator has indicated that the initial MRP issued by OSM states that Skyline has the right to mine and subside all areas within their existing lease and permit area. The operator contends that in the event of any damage caused as a result of subsidence, repair or replacement of such features will be accomplished by the mine as part of their mitigation plan. Areas in contention regarding subsidence include perennial stream channels (Huntington Creek, Eccles Creek, and several tributaries of these two streams), SR 247, and the gas pipeline corridor through the permit area. The operator contends that any repairable damage will be accomplished as subsidence occurs as part of the mitigation plan. For those items which are not considered repairable, such as surface and groundwater, the operator intends on purchasing water rights as replacement. The operator further stated that alternative are being discussed regarding the gas line with the Mountain Fuel and upon agreement between Skyline and the gas company, a proposal will be presented to the Division and the Forest Service.
3. Subsidence Monitoring - The Division had requested more detailed subsidence monitoring primarily in regard to protection of Huntington Creek. The operator indicates that subsidence monitoring plan will be developed for each five-year permit term and details for subsidence control in areas mined within that permit term will be dealt with in the plan. The operator further contends that due to inevitable changes in the mining and sequence plan, detailed

plans for mining and subsidence monitoring cannot be projected over the life of the mine. The operator has requested that questions regarding subsidence be made more specific and made in regard the five-year permit term currently under review.

4. Groundwater Monitoring - The operator's current groundwater monitoring plan includes well monitoring of water elevation only with supplemented seep and spring surveys for quality and quantity. The operator contends that the existing ground water monitoring plan is sufficient and approved. The Division has indicated that the groundwater monitoring plan is not sufficient to determine impact on groundwater for the life of the operation. The operator has stated that the Division needs to be more specific as to any deficiencies found within the groundwater monitoring plan.