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State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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June 14, 1989

TO: Sue Linner, Permit Supervisor

FROM: Randy Harden, Reclamation Engineer *RH*

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

SUMMARY:

The following comments are in regard to the updated five-year permit renewal submittal information received by the Division on December 1, 1988 and update information received on January 13, 1989, February 20, 1989, April 27, 1989, May 10, 1989, May 16, 1989, and June 12, 1989, from Utah Fuel Company.

The operator has provided numerous updates of information for inclusion into the mining and reclamation plan. The amount of material which has been replaced in the plan has consequently led to questions by both the Division and the operator as to whether or not all of the intended information has been correctly and completely incorporated into the MRP for review.

The Division has requested the operator to come to the Division offices and do a page-by-page check of the MRP to ensure that all of the information in the plan is current with the intentions of the operator. The operator did submit some of the hydrologic calculations which were found to have been inadvertently left out of the submittals on June 12, 1989. However, it still appears that much of the information which was requested by the Division and required as part of the schedule for repermitting has not been accomplished by the operator.

While the operator and the Division have made significant improvements in the quality and the reclaimability of the site, a significant amount of work remains to follow through on these preliminary designs to complete the mining and reclamation plan.

It is recommended that the Skyline MRP not be determined complete at this time and that a continued diligence on the part of the operator and the Division be maintained to complete the permitting process.

ANALYSIS:

In accordance with the agreement subject to the meeting held on July 26, 1988, activities were subdivided into four categories. Those categories and the status of completeness of those requirements are summarized below:

1. Miscellaneous Submissions: Including revisions to permit and disturbed area boundaries, land use, vegetational data, wildlife, soils, acid- and toxic-forming materials. Informational data relative to the waste rock disposal area not discussed in Items 2 and 3, below.

Most of the text of the MRP has been revised and modified to address the deficiencies found regarding vegetation, wildlife and soils information in the plan. However, in conjunction with the numerous changes in the MRP regarding backfilling and grading as well as other reclamation design changes, some of the maps and text information in the vegetation section is found to be in conflict with the rest of the MRP.

For example, Map 4.7.2-1 has not been updated to reflect these changes. The most recent revision to this drawing was received by the Division on September 21, 1987. the vegetation plan must be brought up to date with the changes made to the reclamation plan.

2. Operational Hydrologic Design: Disturbed, undisturbed diversion design; sediment pond design calculations; sediment control calculations for roads and waste rock disposal areas; supporting data for small area exemptions.

In the course of the review, it was determined by the operator that the size of the unit train loadout sediment pond was insufficient. However, no proposed redesign or modification to that structure is found in the revisions to the MRP. In order to determine the plan complete adequate sediment control structures must be designed by the operator and approved by the Division.

In the mine facilities area, undisturbed area diversions have been an issue for several years. These issues regard the design use and existing conditions of these diversions. An extension was granted by the division regarding the requirements of the undisturbed diversions based on the operator's ability to survey these undisturbed diversions and determine their existing capacities. These as-built designs of the undisturbed diversions have not been submitted by the operator.

Further, the operator had indicated that the possibility of utilizing underground areas as sumps for mine water treatment would not be made until June of this year. This consideration was also made in granting an extension for the submittal date of this action. No disposition regarding the utilization of underground workings for mine water treatment was found within the text of the revisions to the plan submitted by the operator. The revisions also did not address the capacity of the mine sediment pond with regard to anticipated increases in mine watermake in addition to the affect that the undisturbed diversions may have on the sizing of the sediment pond.

Clearly, the hydrologic design for sediment control has not been completely addressed by the operator. The Division cannot make a determination of completeness until these issues are resolved in the plan.

3. Final Reclamation Design: Backfilling, grading, stream channel reconstruction, Phase I and Phase II hydrologic information, reclamation plans for conveyor bench, culvert crossings and roads.

Although the operator has resubmitted many of the plans and drawings for the facilities, several deficiencies are still found within the MRP. For example, the reclamation plan and drawings for the loadout facilities is not adequate. The reclamation designs and drawings do not include hydrologic design for Phase I and Phase II reclamation. The reclamation plan view provided on Map 4.4.2-1C does not show the disturbed area boundaries. When compared to the Loadout Facilities Map, Map 3.2.1-3 it is clearly apparent that the proposed reclamation will occur outside of the disturbed area boundaries shown on that drawing.

Additionally, post mining land use facilities and hydrologic structures required for Phase I and Phase II reclamation are not provided on the reclamation drawings or within the design calculations. No interim drainage diversions are shown nor the sediment pond for Phase I reclamation. No restoration of drainages is provided for in the recontouring of the site. There is however some discussion of these reclamation treatments within the text of the MRP.

Similar problems are found throughout the reclamation plan for all of the surface facilities. Information presented in the plan for approval appears to be in more or less draft form and are not sufficiently complete for determination of completeness.

The operator has revised the backfilling and grading plan of the facilities to propose a feasible reclamation plan which for the most part addresses AOC and mass balance. However, completion of the designs, drawings and plans need to be accomplished. Information currently not provided on many of the drawings submitted by the operator include but are not limited to scale, certification, references to other drawings and cross sections, and consistency of base contour drawings between different uses and applications in the plan. Several of the drawings have been submitted as Xerox copies rather than blue line copies. The Xerox copies have considerable distortion and are not adequate to determine or verify areal extent of disturbed areas, watershed areas or earthwork calculations. Maps and drawings used for engineering and design calculations must be accurate to determine acceptability of the designs.

4. Monitoring Commitments (Groundwater and Subsidence):
Commitments to monitor groundwater, including the South Fork and Huntington Canyon areas, and commitment to monitor subsidence to insure protection of hydrologic balance.

Refer to comments made by Dave Darby and Rick Summers regarding this category.

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CONCLUSIONS:

Because of the amount of the completeness and technical deficiencies found currently in the MRP, it would be difficult and time consuming to attempt to present them in a written review at this time. It would be to the benefit of the Division and the operator at this time, to meet on a technical level to review the existing information to develop a plan for completion of the remaining deficiencies in the MRP.

The sheer volume of the changes made in the MRP have indicated that the operator has made an effort to meet the schedule as approved by the Division for repermitting. It is also apparent that at least one more major submittal by the operator will be required prior to rendering a determination of completeness. In consideration of this, the schedule for the permitting process should be modified.

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