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State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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TO: Daron Haddock
FROM: Wayne H. Western
DATE: March 30, 1993
RE: Skyline Mine Renewal Response DO 92C, Utah Fuel Company, Skyline Mine, ACT/007/005, Folder #2, Carbon County, Utah

R645-310-522 Coal Recovery

Deficiency:

The Permittee must demonstrate that the mining operations will maximize the use and conservation of the coal resources.

Permittee's Proposal:

Pages 3-8 and 3-8(a) have been changed.

The underground mining operations have been planned to yield the maximum economic recovery of the coal reserves consistent with the practice of protection and use of other natural resources, sound economic and mining philosophies and the protection of the environment. In brief, the Permittee emphasizes that all reserves will be recovered, that can be, with safe, economic and acceptable practices and technology. All mining will be conducted in accordance with the approved Resource Recovery and Protection Plan.

Analysis:

The Permittee has committed to conduct all mining operations in accordance with the approved Resource Recovery and Protection Plan. Emphasizes will be placed on recovering all reserves that can be mined given the limitations of safety, economics and current technology.

The Division generally accepts the Resource Recovery and Protection Plan as evidence that the Permittee plans on conducting mining operations in such a way as to maximize the use and conservation of the coal resources. The Division has no reason to reject the Resource Recovery and Protection Plan. The Permittee is in compliance with this regulation.

Remaining Deficiencies:

1. None.

R645-301-525.100 Subsidence Control Plan

Deficiency:

The subsidence control map will be certified by a qualified register professional engineer. The map will show the permit boundaries, the areas where subsidence is anticipated, the areas where subsidence is permitted and areas protected from subsidence.

Permittee's Response:

A new certified subsidence control map has been enclosed.

Analysis:

The Applicant has provided the Division with a subsidence control map that has been certified by a qualified registered professional engineer.

Remaining Deficiencies:

1. None

R645-301-528.323 Burning and Burned Waste Utilization

Remaining Deficiency:

The Permittee must address this regulation in the Mine and Reclamation Plan.

Permittee's Response:

This was addressed in our December 1992 response on page 3-56.

The underground development waste rock sediment pond sediments and excess fill material will be emplaced and compacted in layers not exceeding two feet in thickness to prevent combustion. As layers of compacted material are added to the floor of the pit, the four-foot thick noncombustible barrier, where requested to isolate any exposed coal seams and venting cracks and fissures, will be added. The Permittee is not responsible for the already existing coal fires in the area. However, they will extinguish any fires which may occur in underground development waste material that they deposit at the site. Only employees who have been trained and authorized by the Operator will be used to extinguish these potential fires. These employees will follow a plan approved by MSHA and the Division. No burning coal or burned coal mine waste will be removed from the permitted area without approval of the Division.

Analysis:

The Permittee did not use a heading to show that the information required in by R645-301-528 was presented on page 3-56 and 3-56(a). Because there was no heading on those pages the information was not noticed by the reviewers.

The information presented by the Permittee meets the Division's requirements for handling coal mine waste fires. The Permittee is in compliance with the regulations.

Remaining Deficiencies:

1. None.

R645-301-536

Coal Mine Waste

Deficiency:

Sample analyses from 8/11/92 were found in the submittal. The analytical report should be referred to on page 4-87 of the MRP. Acid/base accounting results should be included with these reports.

Response:

Page 4-87 has been changed and we have added pages 4-87(b), 4-87(c) and 4-87(d).

Deficiency:

The Permittee is in compliance with this deficiency, however a recent (1992) analysis is requested for inclusion in Exhibit 4.4.5.

Response:

We have enclosed the 8-17-92 analysis which is to be added to Exhibit 4.4.5.

Analysis:

The Permittee has complied with the Division's request.

Remaining Deficiencies:

1. None.

R645-301-540

Reclamation Plan

Deficiency:

For the purpose of determining the non-toxic, non-acidic nature of the material, the following analyses (described in Table 6 of the "Guidelines for Management of Topsoil and Overburden...") should be added to Table 1: acid/base accounting, selenium, boron.

Response:

Acid/base accounting, selenium and boron have been added to page 40-38(b).

Deficiency

No changes to the present plan could be found in Section 4.6.4.1, 4.7.7 or Section 4.4.5. Further information is requested concerning a sampling program for the final graded surface of the waste rock site, if a reduced level of cover is finalized.

Response:

We do not understand this deficiency. On Page 4-40 of our MRP, we outlined our sampling plan. One sample per 2,000 tons of material. The material is in two lifts. It takes more than 2,000 tons to make a lift, so we take more than one sample per two foot lift. We have added acid/base accounting selenium and boron to this list, which already included SAR, EC and percent coal. We do not have any plans to put additional waste material at the RRLO. As we read R645-301-540 we can not see where we are deficient.

Analysis:

The general intent of this deficiency was to have the Permittee sample the material before it was placed in the lift and then have the soil sampled prior to having the three feet of cover material and one foot of topsoil placed on the waste rock disposal site prior to seeding. The sampling program proposed by the Permittee meets the regulatory requirements. Additional sampling would be helpful, but is not required by the Division's regulations.

Remaining Deficiencies:

1. None.