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State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

Norman H. Bangertter
Governor

Dee C. Hansen
Executive Director

Dianne R. Nielson, Ph.D.
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355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203
801-538-5340

April 2, 1993

Mr. Glen Zumwalt
Coastal States Energy Company
P. O. Box 719
Helper, Utah 84526

Dear Mr. Zumwalt:

Re: Inadequate response to Division Order #92E, Coastal States Energy Company,
Skyline Mine, ACT/007/005, Folder #3, Carbon County, Utah

The Division has completed a review of the information you provided intending to satisfy Division Order #92E. The Division has found the materials inadequate to satisfy the Division Order and cannot approve the proposed changes to your plan at this time. Division Order #92E is still in effect and you must revise your plan with respect to the waste rock site diversions accordingly.

The problems with your previous submittals are identified in the enclosed memo written by Sharon Falvey. Please review the memo and the Division Order and insure that the regulatory requirements are met. You should respond by no later than April 23, 1993. I would suggest that if there remain questions with respect to the regulatory requirements a meeting between your staff and Sharon might aid in clarifying the situation.

Please call if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Daron R. Haddock".

Daron R. Haddock
Permit Supervisor

Enclosure

cc: S. Falvey
J. Helfrich
WASTDITC.SKY



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March 31, 1993

TO: File

THROUGH: Daron Haddock, Permit Supervisor

FROM: Sharon Falvey, Senior Reclamation Hydrologist *SXF*

RE: Waste Rock Ditch Designs, D.O. 92E Round 2, Utah Fuel Company, Skyline Mine, ACT/007/005, Folder #2, Carbon County, Utah

SUMMARY:

Due to the incomplete nature of the initial design submittal, a full deficiency review was not contained in the December 3, 1992 memo. The operator submitted an addendum to the November 1992 submittal on January 29, 1993. The complete amendment contains additional ditch designs that are not required to satisfy the Division Order.

The operator's submitted drainage designs for the waste rock site, does not contain all information pertinent to the designs. The operator should note that previously approved design information is more complete in presenting design components. Numerous design deficiencies and conflicting information is presented in the amendment especially that submitted for DU-5. For instance, the operator has submitted two different designs for DU-5 rather than providing replacement pages. However, the operator does provide a demonstration that ditch UDD2 can pass flow from the 100 year-6 hour event assuming the slope presented is constant.

The following analysis outlines lacking design information which the operator should submit. If the Division denies this amendment, the operator should present the information required only for ditch UDD2. If portions of this submittal are approved, both portions of the analysis should be reviewed to aid the operator in submitting a complete waste rock site expansion amendment, if it is pursued by the operator. Keeping in mind that more information than is noted in this overview may be required.

ANALYSIS:

D.O. Analysis

1. Provide the description for which Manning's "n" is based within the design calculations. Provide a source reference. Note:

a velocity considered non erosive in a specific substrate should also have a reference cited.

2. The operator does not provide ditch sizing according to the maximum and minimum slope. The operator should provide ditch depth design based on the minimum slope and velocity determination based on the maximum slope. The operator should note the field conditions must be represented in the design. (The previous field measurement for channel slope was documented as 0.03 ft/ft for DU-5).

3. The operator uses CN of 55 for the area containing conifers. This CN is used for areas which are not grazed and have brush and litter adequate to cover over the soil. The plan contains no vegetation data for this community type near the waste rock site which would provide information to support the stated condition. It is understood that Mr. Shriver did visit the site. However, some grazing does occur in the surrounding watershed. This CN should be adjusted for the state of the vegetation during periods of grazing. A site visit will be used to determine if the presented conditions exist. The operator should recognize the conditions do change over the season/year (especially during grazing) and adjust the CN accordingly.

Waste Rock Expansion

1. The operator should provide enough detail on the vegetation maps to verify the assumptions made for vegetation for CN determination in the surrounding watersheds. Maps for vegetation and soils for the surrounding area should be presented in order to verify the design assumptions.

2. The operator needs to provide an accurate discussion of ditch UDD3. Explain how this ditch will change as the pile progresses. Clearly identify this ditch on Exhibit 4.161-1B.

3. The operator must re-certify the maps as they are revised.

4. The operator should keep in mind that Ditch DU-5 is intermittent and appears to be retained as a permanent ditch. The reclamation design must meet the criteria of R645-301-742.320. Information such as designs for riprap filter blanket will be required on reclaimed channels with erosive velocities.

8. As the operator expands the area of the proposed waste rock site the operator should provide topographic contours that extend beyond the boundaries of the site: the contours should be adequate to determine drainage above and adjacent to the disturbed area. The boundary of the watershed draining to the

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area should be indicated on these maps.

RECOMMENDATION

The operators submittal for D.O. 92 E can not be approved as submitted. It is recommended that this amendment be denied. However, the Division could approve pages submitted which are directly related to D.O. 92E with the condition that the additional information needed should be either; completed during the proposed site expansion or, be completed by a defined timely date, whichever comes first.

If the Division chooses approval, I recommend only pages related to the Division order be replaced. The pages submitted would replace page 17/26, from the currently approved plan, with the design information in Section 14, pages 6, 62, 63, 64 and 65. However, the pages 62-65, submitted on January 29, 1993, should be resubmitted as pages 17/26 - a through d and Section 14, page 6 as submitted on November 9, 1992 should be resubmitted as 17/26 e.