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

Michael O. Leavitt  
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October 18, 1993

Mr. Ken Payne  
Coastal States Energy Company  
Skyline Mine  
P. O. Box 719  
Helper, Utah 84526

Re: Waste Rock Expansion Deficiencies, Coastal States Energy Company, Skyline Mine, ACT/007/005-93H, Folder #3, Carbon County, Utah

Dear Mr. Payne:

On October 12, 1993, the Division sent you the results of our review of your waste rock expansion proposal. We inadvertently left out the review of the engineering section done by Wayne Western. Please find enclosed Wayne's technical memo which covers the engineering section. You should now have a complete review which consists of memos from Paul Baker, Lance Lawson, Wayne Western, Sharon Falvey, and James Smith.

We apologize for the delay in getting you this review. If you have questions, please call me or the appropriate reviewer.

Sincerely,

A handwritten signature in black ink that reads "Daron R. Haddock".

Daron R. Haddock  
Permit Supervisor

enclosure  
cc: B-Team  
waynwast.sky





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TO: Daron Haddock, Permit Supervisor  
FROM: Wayne H. Western, Reclamation Engineer *WHW*  
DATE: October 13, 1993  
RE: Skyline Mine Waste Rock Expansion, Utah Fuel Company, Coastal States Energy, Skyline Mine, ACT/007/005, Folder #2, Carbon County, Utah

**R645-301-521.100. Cross Sections and Maps. The application will include cross sections, maps and plans showing all the relevant information required by the Division, to include, but not be limited to:**

Applicant's Proposal:

The Applicant has submitted maps of waste rock disposal site. Those maps are entitled: Watershed Areas For Drainage Design, Final Reclamation Plan, Surface Drainage at Selected Elevations, Reclamation Plan Phase I, Access Road to Rock Waste Disposal, Location of Hydrologic Monitoring Stations, Facility Plan and Sediment Pond Details.

Analysis:

The Applicant did not provide a scale on the Surface Drainage at Selected Elevations map.

The Applicant did not provide a cross section for most critical section of the sediment pond. The most critical section of the sediment pond is the shortest distance from the water's edge to the stream channel.

Deficiencies:

1. The Applicant will state the scale on the Surface Drainage at Selected Elevations map.
2. The Applicant will provide a cross section for the most critical section of the sediment pond. The most critical section is the shortest distance between the water's edge and the stream channel.



**R645-301-527.240. A commitment that if a road is damaged by a catastrophic event, such as a flood or earthquake, the road will be repaired as soon as practical after the damage has occurred.**

Applicant's Proposal:

The Applicant did not place a commitment in the proposal that catastrophic road damage would be repaired as soon as practical after the damage has occurred.

Analysis:

The Applicant needs to place the commitment to repair any catastrophic road damage as soon as possible.

Deficiencies:

1. The Applicant needs to place in the proposal a commitment that if a road is damaged by a catastrophic event, such as a flood or earthquake, the road will be repaired as soon as practical after the damage has occurred.

**R645-301-534.140. Have a schedule and plan to remove and reclaim each road that would not be retained under an approved postmining land use.**

Applicant's Proposal:

The access road to the site will not be reclaimed except for the removal of the guard rail (Exhibit 1).

Analysis:

Exhibit 1 was not included in the proposal.

The reclamation time table does not list the removal of the guard rails or other structures associated with the road that will have to be removed during reclamation.

Deficiencies:

1. The Applicant will submit proof that the primary road to the waste rock disposal site has been approved for postmining land use by the Division in this submittal.
2. The reclamation time table will include the schedule for removing the guard rails and other associated structures.

**R645-301-536**                      **Coal Mine Waste**  
**R645-301-536.220**                **Prevent combustion**

Applicant's Proposal:

The Applicant does not directly address this issue but does state that the coal content of some coal mine waste prevents it from being disposed underground. Material with a high coal content is prohibited from being disposed of underground because of the combustion potential.

Analysis:

The Applicant has implied that some of the material deposited in the waste rock site has a combustion potential. See page 3-49. The Applicant has not stated what will be done to prevent combustion.

Deficiencies:

1. The Applicant will state that the combustion potential is for coal mine waste that contains coal.
2. The Applicant will state what they will do to prevent combustion in the waste rock disposal site.

**R645-301-534**                      **Roads**  
**R645-301-534.320**                **Be surfaced with rock, crushed gravel, asphalt, or other material approved by the Division as being sufficiently durable for the anticipated volume of traffic and the weight and speed of vehicles using the road;**

Applicant's proposal:

The Applicant states on page 3-51 that the access road to the site is a primary road. The road is also described as a spot gravel road.

On page 3-55 the Applicant states that additional gravel will be selectively placed as required to ensure approximately four inches of road base gravel on the road.

Analysis:

The Applicant states that the access to the waste rock site is by a primary road that is spot graveled. R645-301-534.320 requires that all primary roads be surfaced with durable material. The term spot gravel implies that some sections of the access road are not surfaced

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with gravel and the Applicant does not state what surfacing material is used in the nongraveled sections.

The waste rock disposal operation plan implies that four inch layer of gravel will be used as road base. The proposal does not specifically state if the entire road will be graveled or only parts.

Deficiencies:

1. The Applicant will state what surface material is used on the nongraveled sections.
2. All sections of the access road will be surfaced with durable material.

SKYROCK.WHW