



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

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File

TO: Daron Haddock, Permit Supervisor

FROM: Wayne H. Western, Reclamation Engineer *w1+w*

DATE: January 13, 1994

RE: Reply to Deficiency Response for Railroad Loadout Expansion Dated December 16, 1993, Coastal States Energy Company, Skyline Mine, ACT/007/005, Folder #2, Carbon County, Utah

SUMMARY

In my deficiency response of June 15, 1993, I required the operator supply the Division with additional information about the proposed railroad loadout expansion. The operator supplied some but not all of the required information.

Request for Information:

The operator will provide information on the stability of the pad during and after construction. This will include, but not be limited to, a slope stability analysis, description of the fill material, and a description of the construction techniques.

Operator's Response:

The operator submitted a summary of the physical characteristics of the material used to construct the pad and coal pile. The designs of the pad and stockpile were shown in a cross section entitled Fill at RLO by Bill Shriver and date July 20, 1993.

A summary of the computer aided slope stability analysis was included. The pad has a safety factor of 1.43. If failure were to occur, it would be at the pad's toe and should not extend into the coal stockpile.

Analysis:

The coal stockpile has a safety factor of 1.43. If failure should occur, it most likely will be a rotation failure that will begin at the coal stockpile's toe. The failure circle most likely will not include the fill material.



Remaining Deficiencies:

1. None.

Request for Information:

Any public hazards the expansion could cause, including the effects of flooding.

Applicant's Response:

The Applicant did not address this issue.

Analysis:

The proposed extension of the pad will be closer than 100 feet to the stream. The stream flood water's could erode the pad's toe causing stockpile facility to become unstable. The Division needs to know what effect flooding will have on the pad.

Deficiencies:

1. The operator will provide the Division with information on the effect flooding could have on the pad extension. The information will include, but not be limited to, how flooding could erode the pad's slope and the resulting slope instability. See R645-301-521.180 Support facilities and R645-301-521.190 Other relevant information required by the Division.

Request for Information:

The operator will supply the Division with information on the toxic and acid forming characteristics of the fill material.

Operator's Response:

The operator supplied the Division with information on the selenium and boron concentrations and acid base potential. The material was tested by the Commercial Testing and Engineering Company.

Analysis:

The operator supplied the Division with information on two toxic elements and the acid base potential.

Remaining Deficiencies:

1. None.

Request for Information:

The operator will supply the Division with information on the construction techniques that will be used to enlarge the sediment pond, including the potential for damaging the French drain.

Operator's Response:

The operator did not address this issue.

Analysis:

The operator needs to address the issue of how the sediment pond will be enlarged. The Division is concerned that the French drain could be damaged when the sediment pond is enlarged.

Remaining Deficiencies:

1. The operator must give a detailed description of the construction techniques that will be used to enlarge the sediment pond. The discussion will include but not be limited to how the French drain will be protected. The operator is required to submit this information under R645-301-521.180 Support facilities and R645-301-521.190 Other relevant information required by the Division.

Request for Information:

The operator will describe where the material from the sediment pond expansion will be stored and handled.

Operator's Response:

The operator did not address this issue.

Analysis:

The operator needs to address this issue.

Remaining Deficiencies:

1. The operator will describe how and where the material from the sediment pond expansion will be stored and handled.

Request for Information:

The operator will provide the Division with an estimate for the reclamation costs associated with the coal storage area and sediment pond expansion.

Operator's Response:

The operator did not address this issue.

Analysis:

The operator did not address the issue. The operator is required under R645-301-830.140 to supply the Division with a detailed cost estimate.

Remaining Deficiencies:

1. The operator will supply the Division with a detailed cost estimate for reclamation cost the loadout expansion as required under R645-301-830.140.