

6024



State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

Michael O. Leavitt
Governor

Ted Stewart
Executive Director

James W. Carter
Division Director

1594 West North Temple, Suite 1210

Box 145801

Salt Lake City, Utah 84114-5801

801-538-5340

801-359-3940 (Fax)

801-538-7223 (TDD)

July 11, 1997

TO: File

THRU: Joe Helfrich, Permit Supervisor 

FROM: Michael Suflita, Reclamation Hydrologist 

RE: Road at Waste Rock Disposal Site, Canyon Fuel Co, LLC, Skyline Mine,
ACT//007/006-97D, Folder #2, Carbon County, Utah.

5

SYNOPSIS:

On June 9, 1997 Canyon Fuel Company submitted a request for permit amendment to make modifications to one of the roads at the waste-rock site. The modifications were basically to straighten the road alignment slightly at both ends of a sediment pond. The road is on private property leased by the Operator for waste rock storage. It is not the main haul road for waste rock. The modifications were prompted by the landowner granting permission for timber harvesting further up the road and the resulting need to improve the road for the lumber trucks. The road is also used for access to other landowners beyond the waste rock site. The site is part of the Operators disturbed area.

Analysis:

The request, pg. 3-64 and 3-72(c), describes the treatment of areas not reporting to sediment ponds and sediment control measures used at such areas. The road is actually one of the side embankments of a sediment pond. The two affected areas total about 75 feet of fill along the edge of the road. The road fill segments are below/outside the pond and do not report into it.

The accompanying map, Drwg. No. 3-2-8-4, shows the appropriate plan views and cross sections. Sections B-B and C-C are inconsistent in the labeling and graphic scale. That is, the "ORIGINAL STREAM CHANNEL EL. 7865" labels do not correspond to that elevation when compared to the elevation shown for the bottom of the sediment pond.

It appears the request is for relatively minor modifications and improvements to

the road. These would improve the safety of vehicular operation on the road.

The road type, primary or ancillary, is not designated. This makes it rather difficult to evaluate the adequacy of the proposed action as different criteria apply to the different roads. In addition, there is no indication of work on the new fill areas to prevent erosion. Such procedures as revegetating, or gravel covering are typically employed to meet regulatory requirements.

A search of the regulations for the term "MSHA" showed no apparent State of Utah requirements for MSHA approval of this requested work. However, the Operator should check with MSHA to determine their requirements, if any.

Findings:

The Operator request appears to be minor, and result in improved safety of the road. The road type is not addressed as is necessary for evaluation. Refer to R645-301-527. Erosion prevention & protection on the new fill areas is not adequately addressed. The drawings need to be revised to be consistent and correct. The Operator should confirm and comply with any MSHA requirements.

RECOMMENDATION:

In light of the inadequacies outlined in the above Findings, the Operator should be required to provide the missing information. When that is provided, a proper and complete evaluation can be made by the Division.