

0040



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

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April 11, 1997

TO: File

THRU: Daron Haddock, Permit Supervisor *DRH*

FROM: Mike Suflita, Reclamation Hydrologist *MS*

RE: Snow Storage Pad, Canyon Fuel Company, LLC, Skyline Mine, ACT/007/005-97A, File #2, Carbon County, Utah

**SUMMARY**

On February 4, 1997 Canyon Fuel Company submitted a request for incidental boundary change to add a 0.64 acre pad area to store snow. The pad is across the highway from the eastern end of the operations area and has long been used by Utah Department of Transportation for snow storage. Their justification for this request is the interference of this years heavy snow with mine operations. Except for the space limitations, there are no constraints on when or how much snow is stored on the pad. The land is owned by Utah Fuel and has a UDOT Right of Way through it.

**TECHNICAL ANALYSIS**

**OPERATION PLAN**

**Permit Application Requirements**

Regulatory Reference R645-301-100 and R645-103-234

**Analysis:**

Since the snow storage pad is located immediately adjacent to a highway, State Route 264, it is clearly within 100 feet of a public road. As required by the regulation, para. 234.100, the Operator has obtained the "necessary approvals from the authority with jurisdiction over the public road". Similarly, the Operator has provided the required, para. 234.200 and R645-201-332, public notice published in the local newspaper.

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### **Findings**

The requirements of this section are considered adequate with regard to the proposed change to add a snow storage area.

## **ENGINEERING**

Regulatory Reference R645-301-512

### **Analysis:**

The drawings have been prepared by a Registered Professional Engineer.

### **Findings:**

The requirements of this section are considered adequate with regard to the proposed change to add a snow storage area.

## **HYDROLOGY**

Regulatory Reference R645-731.600

### **Analysis:**

Since the eastern end of the snow storage pad is within 100 feet of Eccles Creek, it is within the stream Buffer Zone. The planned operation of the pad includes storing snow only when it interferes with operations in the main area. As indicated in the Mining & Reclamation Plan and this request, there are no salts or other deicing agents used by the mine which might enter the stream. Coal fines will be included with the snow that is brought to the storage pad, however, these will be treated using straw bales and silt fences as indicated in the request. Also, the area will be cleaned every spring as required by UDOT.

The amount of snowmelt runoff contributed to Eccles Creek will be unchanged. The entry point of a small amount of water will be simply moved by a few feet. Importantly, there is a limit to the snow that can be stored since the pad is already about 60% filled by UDOT operations.

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The Utah Department of Environmental Quality, Division of Water Quality, was consulted as to the necessity of the pad having a UPDES permit. They determined such a permit was not required. Further, they had no difficulty with the snow storage pad being used by the mine. Their evaluation was basically the same as above and included that coal dust on the UDOT road was already being brought to the pad. During discussions it was noted that the present snow storage area would be improved by the mine to result in improved water quality since the salts used by UDOT would be diluted and sediment and debris would be cleaned up.

The post-mining land use is fish & wildlife habitat, grazing, and recreation. The snow storage pad is compatible with these as evidenced by its past use. The area is correctly designated as an Alternate Sediment Control Area. The pad has historically been used by UDOT to store snow and that use will continue after the mine is closed. Therefore, the pad would not be included in mine reclamation.

**Findings:**

The requirements of this section are considered adequate with regard to the proposed change to add a snow storage area.

**RECOMMENDATION:**

The Skyline Mine should be allowed to store snow on the UDOT snow storage pad as proposed in the request for an incidental boundary change.