



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

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December 14, 1998

TO: File

THRU: Daron Haddock, Permit Supervisor 

THRU: Joe Helfrich, Permit Supervisor 

FROM: Michael Suflita, Reclamation Hydrologist 

RE: Waste Rock Expansion, Canyon Fuel Company, LLC, Skyline Mines, ACT/007/005-98F, Folder #2, Carbon County, Utah

SUMMARY:

Canyon Fuel is proposing to expand the waste rock disposal site associated with the Skyline Mines. The Division received the amendment September 2, 1998. A TA was returned to the Applicant on November 6, 1998 and a new submittal was received on November 12, 1998.

This is a review of the hydrological aspects of the latest submittal.

TECHNICAL ANALYSIS:

HYDROLOGIC RESOURCE INFORMATION

Regulatory Reference R645-301-121.200

Analysis:

There are a number of inconsistencies in the submittal that need correction. These include:

- The map contained on Dwg. 3.2.8-2, Waste Rock Facilities and Drainage Control, appears to be inaccurate. This is due to the Permit Area Boundary symbol simply disappearing on the west side of the map. Further, that boundary appears to connect and run into the Disturbed Area and Drainage symbol on the map on the west side. In addition, the Permit Area Boundary delineates TWO areas, one within the other. The map needs to be redrawn to correctly and completely show the permit area boundary.
- The map contained on Dwg. 4.16.1-1B, Waste Rock Disposal Site Reclamation Plan, also appears inaccurate. This is due to the Permit Area Boundary symbol simply disappearing on the west side of the map. Further, that boundary appears to connect and run into the Disturbed Area and Drainage symbol on the map on the west side. In addition, the Permit Area Boundary delineates TWO areas, one within the other. Also the Sediment Pond Drainage Area

symbol shown in the legend changes as it traces the boundary around the designated area. In some places there is one short dash while in other places there are two short dashes. The map needs to be redrawn to correctly and completely show the permit area and drainage boundaries.

Findings:

The information provided in the application is not considered adequate to meet the requirements of this section of the regulations. Prior to approval, the Applicant must provide the following in accordance with the requirements of:

R645-301-121.200, a revised Dwg. 3.2.8-2, Waste Rock Facilities and Drainage Control, and revised Dwg. 4.16.1-1B, Waste Rock Disposal Site Reclamation Plan.

Regulatory Reference R645-301-742.300

Analysis:

Diversion ditches UD-5 and UD-6 are both concrete lined as are the ditches in place today, before the changes to the waste rock pile. They have been performing well and the new ones should do so in the future. UD-5 is a significantly less slope than the channel that feeds into it and this will present a ongoing maintenance issue with deposited sediment.

The other ditches appear to be properly designed with a new DD-16 that flows into the existing and stabilized reach that is rock armored. The two swales in the road appear adequate.

Findings:

The information provided in the application is considered adequate to meet the requirements of this section of the regulations.

Regulatory Reference R645-301-746.320

Analysis:

The riprap at the sediment pond spillway outlet is not adequate. During a site visit there was almost no riprap at all. The current plans do not show the top of the pond embankment as having riprap and this is needed to prevent erosion. The riprap needs to be shown on the drawings.

Findings:

The information provided in the application is not considered adequate to meet the requirements of this section of the regulations. Prior to approval, the Applicant must provide the following in accordance with the requirements of:

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R645-301-746.320, provisions to riprap the sediment pond spillway outlet.

Regulatory Reference R645-301-742.221.34

Analysis:

The sediment pond has a locking valve assembly which allows the pond to be decanted after filling with water.

Findings:

The information provided in the application is considered adequate to meet the requirements of this section of the regulations.

Regulatory Reference R645-301-742.240

Analysis:

The plan shows ASCA 24 (a) below the lower end of the access road. This area is to be revegetated and will have sediment fences at the lower end. These lead to a sediment trap at the low point. This appears to be an adequate means to deal with the situation. The plan, pg.4-38 (a), describes how the area will be hydro-seeded and reclaimed immediately after road construction.

Findings:

The information provided in the application is considered adequate to meet the requirements of this section of the regulations.

Regulatory Reference R645-301-742.223

Analysis:

The sediment pond and it's associated spillway have been designed to meet or exceed the regulation design events.

Findings:

The information provided in the application is considered adequate to meet the requirements of this section of the regulations.

Regulatory Reference R645-301-733.220

Analysis:

The Dwg. 4.16.1-1B, Waste Rock Disposal Site Reclamation Plan shows the final reclamation configuration of the waste rock site. This indicates that the sediment pond below the site and stock pond above the site will be left after reclamation. These ponds would then be classified as permanent impoundments. Such impoundments cannot be authorized by the Division until the requirements in the above-referenced regulation have been satisfied. There is nothing in the submittal to show that these requirements have been met.

Further, there is confusion in the text as to whether the ponds will be left. The September 18, 1998 submittal, page 4-78, indicates that the lower pond will be observed and "If, over a period of time, it shows that the lower pond hold natural runoff water and is beneficial for livestock and wildlife use, it will not be removed. However, if no beneficial use is determined, it will be reclaimed." The November 12, 1998 submittal has no reference to whether the ponds will be left or not. The plan must clearly indicate the reclamation plan for the ponds.

Until the above-referenced requirements have been met, the plan must show the ponds as being reclaimed. The Applicant can also provide an alternate to reclaiming the ponds indicating they will provide a demonstration as required by the regulations as explained above.

The plan does not address the issue of water rights associated with these ponds. Since the water will not flow into the stream as it did before ponds were constructed, and since stock watering is a beneficial use of the water, there needs to be an associated water right. Obtaining the rights is not necessary to approval of this requested action, however, it will be necessary before final reclamation. If the rights cannot be obtained, the leaving of the ponds will not be possible.

Findings:

The information provided in the application is not considered adequate to meet the requirements of this section of the regulations. Prior to approval, the Applicant must provide the following in accordance with the requirements of:

R645-301-733.220, demonstration of necessary requirements to allow the leaving of permanent impoundments, OR revision of the plan to show reclamation of the two ponds.

RECOMMENDATION

The proposed amendment should not be approved in the present form. The Applicant must provide the information outlined above before approval can be granted.