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

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November 6, 1998

TO: File

THRU: Daron Haddock, Permit Supervisor *DQH*

THRU: Joe Helfrich, Permit Supervisor *JH*

FROM: Michael Sufлита, Reclamation Hydrologist *MS*

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.

This is a review of the hydrological aspects of the proposed amendment.

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 as shown, results in the Expansion Area being OUTSIDE the permit area. Further, the existing road leading to the Waste Rock Facility is also shown OUTSIDE the permit area. The map needs to be redrawn to correctly and completely show the permit area boundary.

- The discussion on page 4-38(a) regarding reclamation at the waste rock disposal site is not specific as to how and when the area along the access road will be revegetated. This is designated as ASCA 24 on Dwg. 3.2.8-2, Waste Rock Facilities and Drainage Control. Phone conversations with the Applicant indicate they plan to do final reclamation this area immediately after the road is constructed. This needs to be clearly explained in the amendment, including following the revegetation commitments in the rest of the MRP. Also, the text designates the area as ASCA 24(a) while the drawing designates it as ASCA 24. The two need to be consistent.
- The calculations for the Inlet to Pond from DD-17, page 24, show the ditch depth to be 0.00 feet and a total width that is 0.13 foot shorter than the water width. These need to be corrected.
- Page 3-18(a) indicates that the design storm volume is 53,578 cu. ft. and the sediment storage is 33,454 cu. ft. with a combined volume of 87,120 cu. ft. When those first two numbers are added, they equal 87,032. This inconsistency needs to be resolved.
- The lower end of UD-6 is not shown as flowing into the stream on Dwg. 3.2.8-2, Waste Rock Facilities and Drainage Control. This needs to be added.

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, a revised page 4-38(a) with complete reclamation plans, a revised drawing of Inlet to Pond from DD-17, a consistent total sediment pond volume on page 3-18(a).

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 an 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.

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:

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

Regulatory Reference R645-301-742.221.34

Analysis:

There is no provision to gain access to the valve at the inlet end of the decant pipe for the sediment pond. The inlet is under water out in the pond. That has resulted in the pond not being decanted after a storm event. During a site visit the Applicant committed to pumping the pond to restore it's capacity to contain design events. While vandalism can be a problem at the site, chains and locks can be employed. Regardless of how it is achieved, the pond must be decanted after storm events.

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:

R645-301-742.221.34, provide a means for effectively decanting the pond with the pipe configuration shown, namely a valve control mechanism that can be operated from the pond bank.

Regulatory Reference R645-301-742.240

Analysis:

The plan shows ASCA 24 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.

Findings:

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

Regulatory Reference R645-301-234.200

Analysis:

A site visit showed a topsoil storage pile on top of the waste rock pile. The area where the topsoil pile is located is to be covered by waste rock. The disposition and has not been addressed in the proposed amendment. It is recommended that the Applicant consult with the Division Soil Scientist to determine acceptable methods of dealing with this situation.

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:

R645-301-234.200, provide a complete description of the disposition of the topsoil pile on top of the waste rock pile in order to obtain the necessary Division approval.

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Regulatory Reference R645-301-742.223

Analysis:

The sediment pond and its 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 R645-301-521.150

Analysis:

The amendment contains no information on the final reclamation configuration of the waste rock site. Apparently the Applicant expects to leave the enlarged pile as part of the postmining land use. Further, the property is leased and the landowner intends for the pile to become part of a livestock operation. Regulations call for Land Surface Configuration maps for the reclaimed area and these have not been provided. Page 4.1-3 indicates "The final contours of the rack disposal site are presented in Drawing 4.16.1-1B." This drawing needs to be revised and submitted as part of this amendment.

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:

R645-301-521.150, a revised reclamation contours map.

Regulatory Reference R645-301-731

Analysis:

The Applicant discussed the intent to reclaim the site and leave the sediment pond at the lower end of the site. In addition, there is a possibility that a second pond will be constructed

at the upper end of the site at reclamation time. This is the desire of the landowner and is consistent with the postmining land use of grazing. However, 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 reclamation 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:

R645-301-731, evidence of water rights consistent with the postmining land use.

RECOMMENDATION

The proposed amendment should not be approved in the present form. Except for the water rights mentioned in the last item above, the Applicant must provide the information outlined above before approval is granted.