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# State of Utah

DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF OIL, GAS AND MINING

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June 26, 1998

TO: File

THRU:  Joe Helfrich, Permit Supervisor

FROM:  Priscilla Burton, Soils Reclamation Specialist

RE: Gooseberry, West Ridge, Exploration, Canyon Fuel Company, LLC, Skyline Mine, ACT/007/005-97M, File #2, Carbon County, Utah.

## **SUMMARY:**

Canyon Fuels Co. Proposes to develop 18 drill sites. The sites are all located at high elevations in upper Huntington Canyon. Drilling will occur over the course of the next two years.

## **TOPSOIL**

Regulatory Reference: R645-202-233

## **Analysis:**

Canyon Fuels Co. anticipates salvaging and stockpiling the upper two horizons or six inches of topsoil. Criteria for determining topsoil salvage was not discussed in the plan. That determination will be made on site by a qualified soil scientist or geologist with soils experience.

A recent field visit to the site by the Division and Canyon Fuels representatives left all present acknowledging that at the sites we visited, there was topsoil in excess of six inches to be salvaged. Although each site may vary, the ridge site that we looked at had at least 12 inches of topsoil visible along the road cuts approaching the site. As agreed during the site visit, an accurate estimation of topsoil salvage can only be made after digging a pit and logging and describing horizons at each location. Field notes of the pit should be made for future reference.

## **Findings:**

The NOI does not meet the requirements of this section of the regulations. The applicant needs to make the following changes:

**R645-202-233**, The NOI needs to indicate that for each drill site a qualified individual will develop a soil pit and produce field notes describing a soil pit and its horizons. These notes will serve to identify the "O", "A", "B", and "C" horizons and consequently the topsoil removal depth.

## **ACID- OR TOXIC-FORMING MATERIALS**

Regulatory Reference: R645-202-236

### **Analysis:**

Upon completion of drilling, the materials in the mud pit will be taken to a waste rock disposal area owned by Canyon Fuel and permitted by the Division. Canyon Fuels Co. commits to collect composite samples from the first three mud pits, and, *if these materials are not found to be toxic or acid forming according to R645-301-553.260, then they will be disposed of within the waste rock area or left in place.* The most relevant regulatory citations are probably R645-301-731.110 and R645-301-731.300 which require protection of surface and ground waters from acid and toxic forming materials. It is assumed by the Division, although not stated in the NOI, that the analyses for determining the acidity or toxicity of the material will be according to Division guidelines which are presently used for testing of waste rock at Canyon Fuels Co.

Mudpit samples which are toxic or acid-forming, will be buried with a minimum of four feet of non-toxic, non-acid forming, and non-combustible material in the waste rock area.

### **Findings:**

It is assumed by the Division, although not stated in the NOI, that the analyses for determining the acidity or toxicity of the material will be according to Division guidelines which are presently used for testing of waste rock at Canyon Fuels Co. The information presented in the N.O.I. is adequate for the purposes of R645-202-236.