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State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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March 13, 2001

TO: Internal File
Mike Smith

THRU: Jim D. Smith, Project Lead *ML*

FROM: Wayne H. Western, Senior Reclamation Specialist *WW*

RE: IBC / UP&L Tract, Canyon Fuel Company, LLC, Skyline Mine C/007/005-
IB00B-1

SUMMARY:

On February 21, 2001, the Division received a response to the technical deficiencies that were sent to the permittee on November 1, 2000. The Division reviewed the technical responses and found that the permittee did not adequately address all of the issues. The only engineering issue that needs to be addressed is for the proposed subsidence areas to be shown on a map.

ENVIRONMENTAL RESOURCE INFORMATION

PERMIT AREA

Regulatory Requirements: 30 CFR Sec. 783.12; R645-301-521.

Analysis:

X

Drawing 1.6-3, Skyline Mines Permit Area map, is the ultimate source for all permit boundary information. The permit boundaries on Drawing 3.1.8-3, Mine 3 Level 2 Mine Plan, shows the proposed mine plan for the UP&L tract. All mining in Mine 3 Level 2 will occur within the permit boundaries. The permittee also gave the Division a copy of Drawing No. P:\Permit\Permit Acreage\Skylineacre, Reclamation Agreement, in an AutoCAD file. Both maps list the permit areas and acreage.

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Findings:

The permittee met the minimum requirements of this section.

MAPS, PLANS, AND CROSS SECTIONS OF RESOURCE INFORMATION

Regulatory Reference: 30 CFR Sec. 783.24, 783.25; R645-301-323, -301-411, -301-521, -301-622, -301-722, -301-731.

Analysis:

Existing Structures and Facilities Maps

The only existing structure in or near the UP&L track is an abandoned pipeline.

Existing Surface Configuration Maps

The existing surface configuration (topography) is shown on several maps, such as Map 1-6.1, Land Ownership. The topography is copied from U.S. Geological Survey (USGS) topographic maps and is considered adequate by the Division. Since no surface disturbance is proposed, the Division does not need to have detailed surface maps showing the premining, operation and proposed reclamation contours.

Mine Workings Maps

The permittee did not show any existing mine workings in the area proposed to be added to the permit boundaries on the mine maps.

Permit Area Boundary Maps

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Findings:

The permittee met the minimum requirements of this section.

OPERATION PLAN

MINING OPERATIONS AND FACILITIES

Regulatory Reference: 30 CFR Sec. 784.2, 784.11; R645-301-231, -301-526, -301-528.

Analysis:

Type and Method of Mining Operations

X The mine map that the permittee gave the Division shows longwall panels will be used in the UP&L tract. Longwall mining is the standard mining method at the Skyline mine. The permittee will not need any new surface facilities to support the mining in the UP&L tract.

Facilities and Structures

X The permittee did not propose any new surface facilities or structures to support mining in the UP&L tract.

Findings:

X The permittee met the minimum requirements of this section.

EXISTING STRUCTURES:

Regulatory Reference: 30 CFR Sec. 784.12; R645-301-526.

Analysis:

J The only structure near the UP&L tract is an abandoned gas line.

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Findings:

The permittee met the minimum requirements of this section.

COAL RECOVERY

Regulatory Reference: 30 CFR Sec. 817.59; R645-301-522.

Analysis:

X The UP&L tract has natural boundaries that make access to the coal difficult except from the Skyline Mine. The west and south boundaries are the shore line of Electric Lake. The east boundary is the Connonville Fault. The only practical access to the UP&L tract is through the north via the Skyline Mine. The longwall panels have been set up to maximize coal recover.

X UP&L and its parent companies operate coal mines in Utah. The Division assumes that UP&L and its parent companies have reviewed and approved the coal recovery program.

Findings:

X The permittee met the minimum requirements of this section.

SUBSIDENCE CONTROL PLAN

Regulatory Reference: 30 CFR Sec. 784.20, 817.121, 817.122; R645-301-521, -301-525, -301-724.

Analysis:

Renewable resources survey

The permittee did not include a renewable resource survey for the UP&L tract. However, information in the amendment shows that water rights and other renewable resource exist in the area. Thus, the permittee developed a subsidence control plan for the UP&L tract.

Subsidence control plan

The subsidence control plan must contain the following:

- X • A map of the permit and adjacent areas at a scale of 1:12,000 or larger showing the location of and types of structures and renewable resources in the area that could be subsided is required. The permittee gave the Division

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→ copies of Drawings 2.3.5-1 and 2.3.5-2 at a scale of 1:12,000. The Division is able to determine the location of the renewable resources within the permit area. Those renewable resources are surface and underground water.

• A description of the method to remove coal including the size, sequence and timing for development of the underground workings was shown on Map 3.1.8-3, Mine 3 Level 2 Mine Plan Including UP&L Tract.

• The permittee did not include a map that shows the extent of projected subsidence. The Division is very concerned about subsidence because of the proximity of Electric Lake.

4 On Page 4-94 of the MRP the permittee states that "a 22° angle-of-draw will be used. The support for the 22° angle-of-draw is based on the permittee's data of the Skyline mine and other comparable mining in the Wasatch Plateau." The Division has allowed the permittee to use a 22° angle of draw and has no reason to change the angle of draw.

X The permittee states on Page 4-49 of the MRP the following:

X "There will be no mining caused subsidence under either the Electric Lake Reservoir, Upper Huntington Creek and Bolger Creek inlets to the reservoir, and no mining from which subsidence at the a 22° (from vertical) angle of draw would influence either these reservoir inlets or the high-water level of Electric Lake Reservoir. Map 4.1.1-1 shows the Electric Lake and the inlet buffer zone within which there will be no mining without Division/U. S. Forest Service approval."

X The permittee needs to show that mining will not cause subsidence to occur in or near the shore of Electric Lake Reservoir or its inlets. The Division is concerned that subsidence could occur in the James Canyon inlet.

X • The permittee shows the location of monitoring points for the UP&L tract on Map 4.17.5.

• The permittee needs to state if there are any areas within the UP&L tract that will be protected from subsidence. If such areas exist then the permittee needs to explain how those areas will be protected.

X • The permittee described the anticipated effects of planned subsidence in the Mining and Reclamation Plan (MRP). The effects of subsidence

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include a general uniform lowering of the surface lands in broad areas. Thereby limiting the material effect to those land and causing no appreciable change to present land uses and renewable resources.

- The permittee describes the measures to mitigate any subsidence-related material damage in the MRP. The permittee committed to repair any damage to surface facilities including highways and pipelines.

Performance standards for subsidence control

The permittee committed in the MRP to repair any subsidence damage to the extent technically and economically feasible. This is a standard commitment that the Division accepts for repair of subsidence damage.

The permittee cannot mine under impoundments with a storage capacity of 20 acre-feet or more of water (Electric Lake Reservoir) unless the subsidence control plan demonstrates that subsidence will not cause material damage or reduce the reasonably foreseeable use of the structure. The permittee needs to show that the proposed mining will not damage Electric Lake Reservoir.

If mining causes damage to Electric Lake Reservoir then the Division will suspend mining until a revised subsidence control plan is approved.

Notification

The permittee is required to notify at least six months prior to mining all owners and occupants of surface properties above the underground workings. Utah Power and Light owns both the surface and coal in the UP&L tract. Utah Power and Light has leased the coal right to the permittee.

Findings:

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

R645-301-525.420 and R645-301-521.142 The permittee must show the areas scheduled to subsided. The permittee must show that subsidence will not occur in either the James Canyon stream inlet or the high-water level of Electric Lake Reservoir. See Page 4-94 of the MRP for similar commitment. The permittee must show why full extraction mining would occur under the pipeline in Section 35. Overlay Map 4.17.1-1 and Map 3.1.8-3 for details.

*MJS
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on map*

MAPS, PLANS, AND CROSS SECTIONS OF MINING OPERATIONS

Regulatory Reference: 30 CFR Sec. 784.23; R645-301-512, -301-521, -301-542, -301-632, -301-731, -302-323.

Analysis:

Affected area maps

The permittee did not include an affected area map. The Division generally considers a permit map adequate to meet the requirements of the affected area map. The permittee gave the Division a designated permit boundary map. The permit boundary map shows the permit boundaries and the number of permitted and disturbed acres.

Mining facilities maps

The permittee shows the location of the new gas pipeline on Drawing 1.6-3, Skyline Mines Permit Area map. The map shows that the new gas pipeline will not interfere with full extraction mining in the UP&L tract.

Mine workings maps

Map 3.1.8-3, Mine 3 Level 2 Mine Plan Including UP&L Tract, shows the sequence and timing of the development work and underground mining.

Monitoring and sample location maps.

The permittee shows the location of the subsidence monitoring points for the UP&L tract on Drawing 4.17.5-1, Subsidence Monitoring Points.

Findings:

The permittee met the minimum requirements of this section.

RECOMMENDATIONS:

The Division should not approve the amendment until the permittee adequately address the deficiencies in this TA.