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

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July 10, 2002

Tom Rasmussen  
Bureau of Land Management  
125 South 600 West  
Price, Utah 84501

Re: Comments on Notice of Intent to Conduct Minor Coal Exploration, Canyon Fuel Company, LLC., Skyline Mine, C/007/005-EX02E, Outgoing File

Dear Mr. Rasmussen:

The Division has reviewed Canyon Fuel Company's recent Notice of Intent to Conduct Minor Coal Exploration at the Skyline Mine. The proposal involves drilling 1 exploration hole on lease U-0147570 and 4 exploration holes on lease UTU-67939. Our comments are as follows:

- It is felt that the information given for acid and toxic forming materials is inadequate. The Division will request lab analysis of materials above and below the mineable coal seams to determine their acid and toxic forming characteristics. This information will help determine the potential for impacting ground water after mining occurs and will aid in determining the soil cover needed over any refuse piles.

A copy of the Division's analysis is enclosed for your information. Thank you for the opportunity to comment on this proposal. Please call me at (801) 538-5325 or Steve Demczak at (435) 613-5242 if you have any questions.

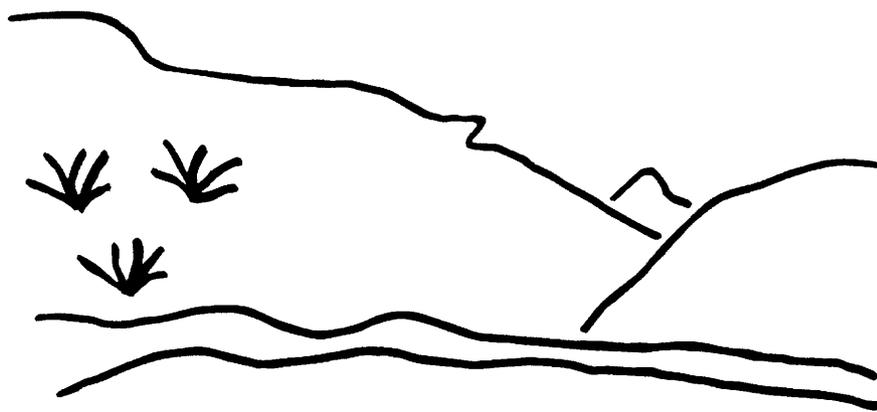
Sincerely,

A handwritten signature in black ink that reads "Daron R. Haddock".

Daron R. Haddock  
Permit Supervisor

an  
Enclosure  
cc: Price Field Office  
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# State of Utah



## Utah Oil Gas and Mining

### Coal Regulatory Program

Skyline Mine  
Exploration U-0147520 & UTU-67939  
C/007/005-EX02E  
Analysis  
July 10, 2002

**INTRODUCTION**

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**ANALYSIS**  
**INTRODUCTION**

Arch Coal Inc. is submitting a Notice of Intent to conduct Minor Coal Exploration on behalf of Canyon Fuel Company, LLC-Skyline Mine. The permittee is proposing to drill one drill hole into the coal seam on coal lease U-0147570 and four drill holes on coal lease UTU-67939. The coal is under the jurisdiction of the United States Bureau of Land Management. The United States Forest Service is the surface owner.

The general exploration area is located in east-central Utah three miles southwest of Scofield. The permittee will remove approximately of 267 lbs. of coal per drill hole.

The permittee plans to start drilling the second week of July 2002. It is planned that the project will take eight weeks from start to finish, including the reclamation of the drill site. This may vary due to weather conditions.

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C/007/005-EX02E  
July 10, 2002

**INTRODUCTION**

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**COAL EXPLORATION**

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**COAL EXPLORATION**

Regulatory Reference: R645-200.

**SCOPE AND RESPONSIBILITIES**

Regulatory Reference: 30 CFR 772.1; 30 CFR 772.10; 30 CFR 772.11; R645-100-400; R645-200-100; R645-200-200; R645-201-100.

**Analysis:**

Ark land Company has submitted information to address 43 CFR 3482 (a)(1) thru 43CFR 3484.1(a)(5), which equates to regulations R645-200 through R645-203 of the State Regulatory Program.

**Findings:**

The information that was submitted is complete and adequate.

**REQUIREMENTS FOR NOTICE OF INTENTION TO CONDUCT MINOR COAL EXPLORATION**

Regulatory Reference: 30 CFR 772.10; 30 CFR 772.11; R645-100-412; R645-201-200.

**Analysis:**

The permittee has submitted the following information: name, address, and telephone number of the applicant's representatives, who will be present at and responsible for conducting the exploration operations. This information was within the Coal Exploration Plan.

The Coal Exploration Plan incorporates a narrative and map describing the exploration area and indicates where the exploration will occur.

The permittee will transport all drilling equipment to a staging area (Skyline's waste rock disposal site). The equipment will then be transported by helicopter from Skyline's Waste Rock disposal area to a drill hole site. A helicopter will then be used to transport drilling equipment from one drill site to another.

The drill site will be approximately 0.08 acres of disturbance. The total disturbed area for all drill holes will be 0.32 acres. The excavation for the drill sites will be minimal, using hand tools only.

The exploration will take place on Coal Leases U-0147570 and UTU-67939, three miles southwest from the town of Scofield. The permittee will remove approximately 267 lb. of coal

from each drill hole. This will be achieved by drilling a 3-3/16 inch diameter hole. Upon completion, the drill holes will be sealed with cement/bentonite from the bottom of the hole to ground level.

The only heavy equipment to be utilized will be a water truck and storage tank to supply drill water located along existing roads. A road grader and gravel trucks, as needed, will be used for road maintenance.

The permittee plans to start drilling the second week of July 2002. It is planned that the project will take eight weeks from start to finish, including the reclamation of the drill site. This may vary due to weather conditions.

**Findings:**

The applicant has given all of the necessary information.

**COMPLIANCE DUTIES**

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## **COMPLIANCE DUTIES**

Regulatory Reference: 30 CFR 772.13; R645-202.

Ark Land Company will minimally disturb the natural land surface while conducting the exploration of the drill hole pad area. The drill hole site will be located in an area requiring some leveling. Drilling equipment at each pad site will require minimal amount of hand leveling, by shoveling and using crib blocks.

Brattice, pit liner or other similar material will be placed on the ground beneath the drill rig, fuel and/or lubricating oil containers not stored in a truck.

The operator has committed in the Coal Exploration Plan to clean-up spills and seed all disturbed areas.

## **OPERATIONAL STANDARDS**

Regulatory Reference: 30 CFR 772.13; R645-202-100.

### **Analysis:**

#### **Biology**

If there is reason to believe that Threatened or Endangered (T&A) species of plants or animals, or migratory bird species of high Federal interest occur in the area, the Lessee shall be required to conduct an intensive field inventory of the area to be disturbed and/or impacted. This is a requirement of Appendix B in the Coal Exploration Plan. The U.S. Forest Service (surface management agency) will make this decision

Ark Land will have field inventories done of threatened or endangered fauna and flora by a third contractor in the early summer of 2002. A plan will be submitted with recommendations for the protection of, or measures to be taken to mitigate impacts, should any threatened or endangered fauna or flora be found.

Threatened and endangered species in the exploration area includes Bald Eagles, Northern Goshawk, and Northern Three-toed Woodpecker. Exploration and reclamation activities will not occur during breeding and nesting periods nor will they occur within one-half mile of known breeding and nesting areas. No Northern Three-toe woodpeckers have been observed during survey. No other threatened or endangered or sensitive species of wildlife are present. The two Goshawk nests are not located on or contiguous to the exploration drill holes.

## COMPLIANCE DUTIES

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### **Roads**

R645-202-232; Ark Land Company will use existing U.S. Forest Service Development Roads to conduct exploration. The roads that will be used are development roads #221 and #233. The permittee will also obtain a Road Use Permit from the U.S. Forest Service. This permit contains a bond in case the roads are damaged.

The only heavy equipment utilizing the FDR roads will be a water truck. Also, a road grader and gravel trucks, as needed, will be used for road maintenance. No additional roads will be developed.

### **Topsoil**

Topsoil will be saved, and protected by silt fences. No mud pits will be constructed.

### **Diversions of Overland flows and streams**

The surface topography of the exploration area is slightly sloping canyon bottoms with small drainages nearby. The permittee states there will be no diversions of overland flow and the exploration sites will not affect the nearby drainages.

### **Hydrologic Balance**

The surface topography of the exploration area is slightly sloping canyon bottoms with small drainages nearby. The drilling area will be reclaimed to the approximate original contour. These areas are small at 0.08 acres and will not affect the hydrologic balance of this area.

### **Acid- or toxic forming materials**

All drilling fluids, cuttings, and mud will be contained on the project site in mud pits or portable containers. An MSDS sheet will be provided for all drilling fluids and mud used. The permittee stated that during past drilling programs that no acid-forming materials were encountered.

The Division of Oil, Gas and Mining would request lab analysis of acid and toxic forming materials above and below the mineable coal seams. This information could help in determining the quality of ground water after mining has taken place, and in the determination of soil cover needed over refuses piles.

### **Findings:**

Information provided in the proposed Coal Exploration Plan is not considered adequate to meet the requirements of this section. The Division would request the following information.

**COMPLIANCE DUTIES**

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**R645-202-236**, The Division feels that the information given for acid and toxic forming materials is incomplete. The Division of Oil, Gas and Mining would request lab analysis of acid and toxic forming materials above and below the mineable coal seams. This information could help in determining the quality of ground water after mining has taken place, and in the determination of soil cover needed over refuses piles.

**RECLAMATION STANDARDS**

Regulatory Reference: 30 CFR 772.13; R645-202-200.

**Analysis:**

**Approximate original contour**

Ark Land Company will remove the vegetation and remove the topsoil for leveling the drill rig and safety purposes. The total disturbed area per drill site will be 0.08 acres. The permittee has committed to restored drill pad area to AOC.

**Revegetation**

The permittee has submitted a seeded mix on Page 17. Prior to any seeding, the USFS will be consulted to ensure proper seed mixture.

All organic material grubbed from the drill pad will be salvaged to use as a surface mulch during reclamation operations. It is recommended that only materials native to the site be used as mulch. Noxious weed free straw or hay will introduce additional non-noxious weeds.

**Boreholes**

The main drill hole diameter will be 3-3/16 inches diameter. The depth of the hole will be between 1,000 ft. to 1,600 ft.

Upon completion of the drilling, holes will be plugged with cement or cement/bentonite slurry to its full depth. A brass tag will be placed at the top of the drill hole stating the operator's name, drill hole number, and legal description.

No water monitoring sites will be drilled. The portable rig being used is small to install the necessary casing needed for a water-monitoring well.

**Facilities and Equipment**

All drilling equipment and materials will be removed from the drill area once drilling is completed. Sealing will start thereafter, and all equipment and material for sealing the drill hole will be removed, when sealing is completed.

No facilities are to be built during this exploration program.

**Findings:**

The information provided meets the minimum regulatory requirements of this section.

PUBLIC AVAILABILITY OF INFORMATION

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## PUBLIC AVAILABILITY OF INFORMATION

Regulatory Reference: 30 CFR 772.15; R645-203.

### **Analysis:**

No information is given in the Coal Exploration Plan. This is a decision between the permittee and the Regulator Authority (Bureau of Land Management).

### **Findings:**

This is a decision between the permittee and the Regulator Authority (Bureau of Land Management).

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