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# State of Utah

## DEPARTMENT OF NATURAL RESOURCES

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July 6, 2007

Gregg A. Galecki, Environmental Coordinator  
Canyon Fuel Company, LLC  
HCR 35, Box 380  
Helper, Utah 84526

Subject: Waste Rock Pile Expansion, Task ID #2800, Skyline Mine, Canyon Fuel Company, LLC, C/007/0005

Dear Mr. Galecki:

The Division has completed a partial review of your amendment to the Skyline Mine Mining and Reclamation Plan (MRP) for the Waste Rock Pile Expansion submitted on May 4, 2007.

Some deficiencies and additional information remain that must be addressed before the amendment can be determined technically complete and approved. Because the amendment submittal was not complete, all sections could not be reviewed by the Division. Therefore, a list of deficiencies identified thus far is included for your information. These deficiencies do not preclude additional deficiencies identified upon further review of a complete amendment by the Division.

Each deficiency identifies its author by that author's initials in parentheses, so that your staff can directly communicate with that individual should any questions arise relative to the preparation of a response to that particular deficiency. Technical memos prepared by each of the reviewers can be made available upon request.

Please respond to these deficiencies and provide a technically complete and adequate submittal so that we may efficiently process your amendment.

Sincerely,

Pamela Grubaugh-Littig  
Permit Supervisor

sb  
Enclosure  
cc:

Price Field Office  
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**Deficiency List  
Task ID #2800  
Waste Rock Pile Expansion**

The members of the review team include:

Wayne Western [WHW]  
Priscilla Burton [PWB]  
Steve Fluke [SMF]  
Jerriann Ernstsens [JE]

**Bond**

**R645-301-830.130 and R645-301-830.140**, The Permittee must include detailed reclamation costs that are based on the approved reclamation plan. The Permittee must include all of the activities listed in Section 4.6.4.1 of the MRP in the reclamation cost estimate. [WHW]

**Soil**

**R645-301-222**, The Permittee must provide soil consultants credentials for soil taxonomic work. The Permittee must provide a map with a scale of 1:12,000 showing the soil survey of the site and locations of test pits. The soil report must include soil analyses by horizon from the test pits for baseline information described in the Division's 2005 DRAFT Soils and Overburden Guidelines Table 3. The soil report must include field notes with a description of the manmade materials encountered at SP1. For each pit, the soil report must indicate depth to lithic contact or state bedrock was not encountered. The soil report must include transects across the proposed disturbed area to determine the patterns of occurrence of different kinds of soils or inclusions within the map unit, their proportionate extent, and their position on the landform. [PWB]

**Hydrology**

**R645-301-742.221.32**, The MRP presents the EPA issued NPDES permit UT-0023540 in two places sections: Volume 1, Section 2.3, Exhibit 2.3-1; and Volume A-1. Both permits have expired and do not indicate an outfall for the WRP sedimentation pond. Table 2.3.7-3 of Section 2.3 of the MRP lists four NPDES outfalls for the Skyline Mine including outfall 003 for the Waste Rock Area. The MRP does not list sampling requirements, including effluent limitations, for current UPDES outfalls. The existing UPDES permit should be included and expired NPDES permits should be removed from the MRP. [SMF]

**R645-301-742.300**, Plate 3.2.8-1 of the amendment shows five swales (SW-13, 14, 17, 18, and 19) and seven ditches (UD-6A, UD-6B, and UD-6C, UD-4, UD-7, DD-14, and DD-15) that do not report to the sedimentation pond. Design and calculations for these diversions should be presented in Volume 5, Section 14 of the MRP, Drainage Control Waste Rock Disposal Site. This section should be updated to show the proposed and/or existing drainage controls within the WRP permit area. [SMF]

**R645-301-746.212**, The waste rock pile amendment demonstrates that ditches DD-16 and DD-17 are designed for peak flow depths and velocities in response to the 10-yr, 6-hr precipitation event. However, ditches that receive runoff from a refuse pile must be designed to safely pass the runoff from a 100-yr, 6-hr precipitation event. [SMF]

**R645-301-746.340**, The MRP should discuss a commitment to operate the WRP sedimentation pond such that at least 90 percent of the water stored during the design precipitation event will be removed within a 10-day period following the event. [SMF]

**R645-301-742.212**, A certification statement for the WRP sedimentation pond, dated March 15, 1991, is located in Section 3.2 of the MRP (p. 3-22). The statement's description of the pond does not match the existing or proposed pond. The certification statement should be removed and replaced with one that is current and accurate. [SMF]

**R645-301-742.100**, The description of ASCA 24 in Section 3.2.12 of the MRP (P. 3-71) needs to be updated to reflect the increase in acreage of the WRP permit area. [SMF]

**R645-301-744.100**, Discharge from the WRP sedimentation pond should be controlled to reduce erosion and to minimize disturbance to the hydrologic balance. As shown on Plate 3.2.8-4, discharge structures include a plunge pool and ditch UD-7 at the decant pipe outlet, and ditch UD-4 at the emergency spillway outlet. The hydrologic design criteria for these structures are not presented in the amendment or existing MRP. [SMF]

**R645-301-761**, All ditches are to remain following reclamation. Deficiencies identified in the Operations Plan for ditches must be addressed in order to comply with the Reclamation Plan requirements. [SMF]