

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

July 10, 2008

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TO: Internal File

THRU: James D. Smith, Permit Supervisor *JS 07/11/08*

FROM: Priscilla Burton, CPSSc, Environmental Scientist III *PWB by ar*

RE: Re-Mining of Waste Rock Pile, Canyon Fuel Company, Skyline Mine, C/007/0005, Task ID #2977

SUMMARY:

Canyon Fuel Company has abandoned the plan approved in January 2008 to expand the waste rock pile and instead will re-mine the existing waste rock pile. The application consists of a revision to Dwg. 3.2.8-2 Waste Rock Facilities and Drainage Control to illustrate the location of the topsoil stockpile(s); Plate 4.16.1-1D Waste Rock Disposal Site Possible Reclamation Plan; Table 4-6.1 seed mix; and revisions to the narrative on pages 3-56, 4-37, 4-38a, 4-39a-1, and 4-90. Re-mining of the site was previously approved by DOGM engineering review in April 2007 (Task 2754). Approval of this topsoil and replacement plan is recommended.

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TECHNICAL ANALYSIS:

OPERATION PLAN

TOPSOIL AND SUBSOIL

Regulatory Reference: 30 CFR Sec. 817.22; R645-301-230.

Analysis:

Topsoil Removal and Storage

To facilitate re-mining, the narrative on page 4-39a(1) describes removal of the imported topsoil and storage of the estimated 12, 200 cu yd in the northeast corner of the disturbed area. The volume estimate is based upon the removal of two feet of soil cover from the waste rock site.

Section 4.6.1 of the approved plan describes equipment to be used and protection of topsoil stockpiles. The seed mix is described in Table 4.6.1.

Findings:

The information provided meets the requirements of the Coal Rules for topsoil protection.

RECLAMATION PLAN

TOPSOIL AND SUBSOIL

Regulatory Reference: 30 CFR Sec. 817.22; R645-301-240.

Analysis:

Redistribution

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Salvaged topsoil will be redistributed to a depth of 18 inches over the site. If additional soil is needed, it will be imported as described on page 4-38(a). Imported soil will be analyzed for the parameters described on page 4-38a (N, P, K, pH, EC, and texture).

Existing approved reclamation maps of the expansion are shown on Map 4.16.1-1C without a pond retained and on Map 4.16.1-1B with the pond retained (at landowners request).

Reclamation of the site will be to approximate original contour as stated on pg 3-56. Plate 4.16.1-1D represents the reclamation contours for the remaining scenario.

As described on page 4-90, Section XXX, Plates 4.16.1-1B and 4.16.1-1C represent reclamation contours for the alternative, expanded waste rock storage site.

Findings:

The information provided meets the requirements of the Coal Rules for topsoil and substitute topsoil redistribution.

RECOMMENDATIONS:

The Division should approve this application.