



OGMCOAL DNR &lt;ogmcoal@utah.gov&gt;

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## 0070005 Skyline Mine Task 5621 Equipment Abandonment

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**Priscilla Burton** <priscillaburton@utah.gov>

Tue, Mar 20, 2018 at 4:32 PM

To: Jeff Salow <jsalow@fs.fed.us>, Steve Falk <sfalk@blm.gov>

Cc: OGMCOAL DNR <ogmcoal@utah.gov>, Daron Haddock <daronhaddock@utah.gov>, Steve Christensen <stevechristensen@utah.gov>

Hello Jeff and Steve,

This email follows a message that I left on your voice mail.

On March 14, the Division received an application from Skyline Mine to leave equipment underground (attached). Our hydrologist and engineer have reviewed the proposal (findings attached). The Division is ready to authorize approval.

However, we would like to give both the USFS and the BLM an opportunity for review and comment. A reply to this email or a phone call would be fine.

If you'd like to respond by phone, please call me or Daron Haddock (801-538-5325) or Steve Christensen (801-538-5350).

If we do not hear back from you by April 13th (30 days), we will assume that you agree with our analysis. As always, a more prompt response would be greatly appreciated.

Thank you,

*Priscilla Burton, MS, CPSSc  
Environmental Scientist/Review Team Lead  
Division of Oil, Gas, & Mining  
Price Field Office*

office: 435-613-3733  
[priscillaburton@utah.gov](mailto:priscillaburton@utah.gov)

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### 2 attachments

 **03142018.5621.pdf**  
4731K

 **03202018 Task 5621 equipment abandonment findings.pdf**  
61K

March 14, 2018

Daron Haddock  
Coal Program Manager  
Utah Division of Oil, Gas and Mining  
1594 West North Temple, Suite 1210  
Salt Lake City, Utah 84114-5801

RE: Equipment Abandonment in Coal Lease UTU-67939, Canyon Fuel Company, LLC, Skyline Mine, C/007/005

Dear Mr. Haddock:

Skyline Mine has recently completed mining in the 8 Left through 15 Left district of Federal Coal lease UTU-67939, located north of Winter Quarters. The area is scheduled to be sealed in the next few weeks. Skyline is requesting a total of 137 conveyor pan-line sections be left underground due to safety concerns of removing them from the mine. All other equipment has been removed from the area, and all hoses and fluids have been removed from the pan-line. Only steel will be left underground.

Section 2.5.2 – Hydrological Impacts of Mining, located in the currently approved M&RP addresses the abandonment of equipment. Section 2.5.2 (page 2-51c) currently references metalurgical studies cited by the BLM, and provides a discussion outlining the insignificance of abandoning steel underground! Plate 2.5.2-1; Mine 3 Levels 2&3 Abandoned Mining Equipment Locations, has been modified to include the pan-line sections currently proposed for abandonment (18A).

Attached to this cover letter are completed C1 and C2 forms, and two (2) hard copies of Plate 2.5.2-1\_rev.7. A hard copy of the application are being sent via USPS with the intent that Skyline Mine have a copy returned to the Mine with the Division Incorporated stamp.

If you have any questions, please call me at (435) 448-2636.

Sincerely,



Gregg A. Galecki  
Sr. Environmental Engineer, Skyline Mine  
Canyon Fuel Company, LLC

# APPLICATION FOR COAL PERMIT PROCESSING

Permit Change  New Permit  Renewal  Exploration  Bond Release  Transfer

**Permittee:** Canyon Fuel Company, LLC

**Mine:** Skyline Mine

**Permit Number:** C/007/005

**Title:** Equipment Abandonment 2018

**Description,** Include reason for application and timing required to implement:

Seeking permission and identifying location to abandon equipment within the next three (3) weeks.

**Instructions:** If you answer yes to any of the first eight (gray) questions, this application may require Public Notice publication.

- Yes  No 1. Change in the size of the Permit Area? Acres: \_\_\_\_\_ Disturbed Area: \_\_\_\_\_  increase  decrease.
- Yes  No 2. Is the application submitted as a result of a Division Order? DO# \_\_\_\_\_
- Yes  No 3. Does the application include operations outside a previously identified Cumulative Hydrologic Impact Area?
- Yes  No 4. Does the application include operations in hydrologic basins other than as currently approved?
- Yes  No 5. Does the application result from cancellation, reduction or increase of insurance or reclamation bond?
- Yes  No 6. Does the application require or include public notice publication?
- Yes  No 7. Does the application require or include ownership, control, right-of-entry, or compliance information?
- Yes  No 8. Is proposed activity within 100 feet of a public road or cemetery or 300 feet of an occupied dwelling?
- Yes  No 9. Is the application submitted as a result of a Violation? NOV # \_\_\_\_\_
- Yes  No 10. Is the application submitted as a result of other laws or regulations or policies?  
*Explain:* \_\_\_\_\_
- Yes  No 11. Does the application affect the surface landowner or change the post mining land use?
- Yes  No 12. Does the application require or include underground design or mine sequence and timing? (Modification of R2P2)
- Yes  No 13. Does the application require or include collection and reporting of any baseline information?
- Yes  No 14. Could the application have any effect on wildlife or vegetation outside the current disturbed area?
- Yes  No 15. Does the application require or include soil removal, storage or placement?
- Yes  No 16. Does the application require or include vegetation monitoring, removal or revegetation activities?
- Yes  No 17. Does the application require or include construction, modification, or removal of surface facilities?
- Yes  No 18. Does the application require or include water monitoring, sediment or drainage control measures?
- Yes  No 19. Does the application require or include certified designs, maps or calculation?
- Yes  No 20. Does the application require or include subsidence control or monitoring?
- Yes  No 21. Have reclamation costs for bonding been provided?
- Yes  No 22. Does the application involve a perennial stream, a stream buffer zone or discharges to a stream?
- Yes  No 23. Does the application affect permits issued by other agencies or permits issued to other entities?

**Please attach four (4) review copies of the application. If the mine is on or adjacent to Forest Service land please submit five (5) copies, thank you.** (These numbers include a copy for the Price Field Office)

I hereby certify that I am a responsible official of the applicant and that the information contained in this application is true and correct to the best of my information and belief in all respects with the laws of Utah in reference to commitments, undertakings, and obligations, herein.

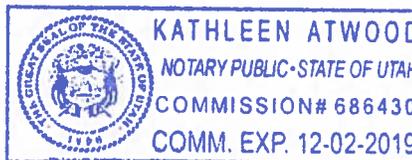
Craig Brown  
Print Name

Craig Brown, Engineering Manager, 3/14/18  
Sign Name, Position, Date

Subscribed and sworn to before me this 14<sup>th</sup> day of MARCH, 2018

Kathleen Atwood  
Notary Public

My commission Expires: 12-02, 2019 }  
Attest: State of UTAH } ss:  
County of Carbon



<b>For Office Use Only:</b>    	<b>Assigned Tracking Number:</b>  	<b>Received by Oil, Gas &amp; Mining</b>  
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**99A ★ EQUIPMENT DESCRIPTION:**  
SINGLE SHIELD, RAMS AND HOSES REMOVED.  
NO REMAINING FLUIDS. ABANDONED 6/95.

**99B ★ EQUIPMENT DESCRIPTION:**  
CONVEYOR BELT TAIL, STEEL AND RUBBER  
ONLY. NO REMAINING FLUIDS. ABANDONED  
12/98.

**99C ★ EQUIPMENT DESCRIPTION:**  
LONGWALL EMULSION TANK, 3000 GAL.  
CAPACITY. NO REMAINING FLUIDS.  
ABANDONED 12/98.

**99D ★ EQUIPMENT DESCRIPTION:**  
FOUR LONGWALL SHIELDS, USEABLE PARTS  
REMOVED. EMULSION REMOVED. NO  
REMAINING FLUIDS. ABANDONED 12/98.

**01A ★ EQUIPMENT DESCRIPTION:**  
LONGWALL FACE CONVEYOR. 160 PAN  
SECTIONS. NO FLUIDS OF HOSES REMAIN.  
STEEL ONLY. ABANDONED 4/01

**04A ★ EQUIPMENT DESCRIPTION:**  
121 EACH DOWTY AND K-B ROOF SUPPORTS  
(SHIELDS). LONGWALL FACE CONVEYOR  
COMPLETE WITH LINE PANS, SPECIAL PANS,  
TAILGATE DRIVE, AND STAGELoader.

**04B ★ EQUIPMENT DESCRIPTION:**  
APPROXIMATELY 82 K-B ROOF SUPPORT  
SHIELDS BETWEEN XCUTS 22 AND 37, 6L B  
PANEL. NO FLUIDS REMAIN. STEEL ONLY.  
ABANDONED 3/04

**08A ★ EQUIPMENT DESCRIPTION:**  
148 EACH GULLICK DOBSON SUPPORTS -  
SHIELDS ONLY (EMULSION WAS DILUTED TO  
97-100% WATER, ELECTRONICS, LIGHTS, AND  
BATTERIES WERE REMOVED). ABANDONED  
05/08

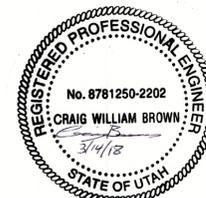
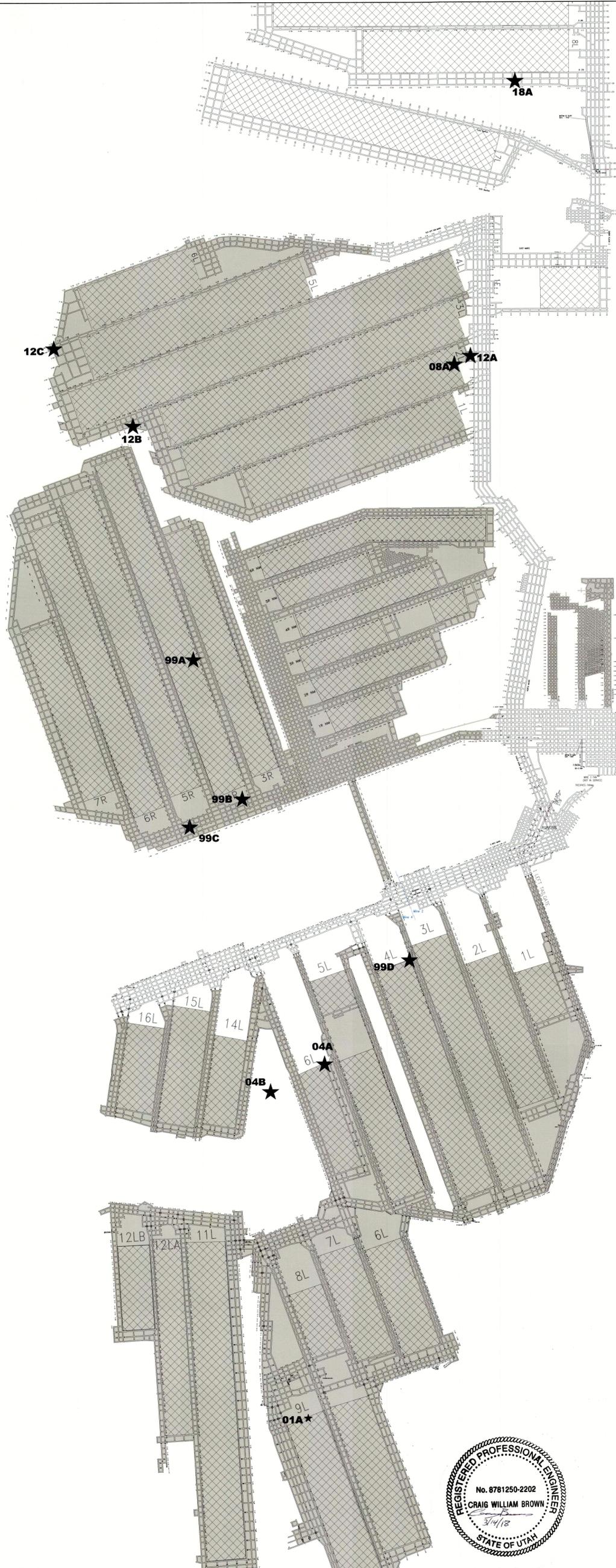
**12A ★ EQUIPMENT DESCRIPTION:**  
167 PIECES ARMORED FACE CONVEYOR,  
STEEL ONLY. Abandoned 8/12

**12B ★ EQUIPMENT DESCRIPTION:**  
PICKUP TRUCK - ALL FLUIDS DRAINED, BATTERY  
REMOVED. Abandoned 8/12

**12C ★ EQUIPMENT DESCRIPTION:**  
POWER CENTER, SUMP TANK, AND DUST POD -  
STEEL ONLY. Abandoned 8/12

**18A ★ EQUIPMENT DESCRIPTION:**  
LONGWALL FACE CONVEYOR. 137 PAN  
SECTIONS. STORED IN CROSS CUTS 8-12. NO  
FLUIDS OR HOSES REMAIN. STEEL ONLY.  
ABANDONED 3/18

**No other equipment abandoned in 8 Left - 15 Left**



DATE	BY	REVISION
6/10/03	DEJ	
6/12/04	CDH	
6/22/04	CDH	
6/14/08	G.G.	Added 08A, Changed Plate No from 2.3.6-3
		Changed Equipment Cataloging, deleted 04A listing
7/09/12	C.W.W.	Added Armored Face Conveyor
8/2/12	CAG	Added 12B AND 12C EQUIPMENT
3/15/18	CAG	Added Pan Line in 8 Left

MINE 3 LEVELS 2 & 3  
ABANDONED MINING EQUIPMENT LOCATIONS

**Canyon Fuel Company, LLC**  
Skyline Mines

DATE: 6/09/03 BY: G. GGALECKI REVISION: 7  
SCALE: NTS DR. BY: T. EARL  
DWG. NO.: 2.5.2-1



# State of Utah

## DEPARTMENT OF NATURAL RESOURCES

MICHAEL R. STYLER  
*Executive Director*

### Division of Oil, Gas and Mining

JOHN R. BAZA  
*Division Director*

## Technical Analysis and Findings

### Utah Coal Regulatory Program

**PID:** C0070005  
**TaskID:** 5621  
**Mine Name:** SKYLINE MINE  
**Title:** EQUIPMENT ABANDONMENT

### Environmental Resource Information

#### Probable Hydrologic Consequences Determination

##### *Analysis:*

The amendment meets the State of Utah R645 requirements for Probable Hydrologic Consequences Determination.

The amendment proposes to abandon steel-only materials within the mine. The permittee has addressed the probable hydrologic consequences pertaining to abandoning mining equipment on page 2-51c. It is unlikely that equipment abandoning will have additional impacts, not already outlined in the MRP, on the hydrologic balance, sediment yield, acidity, TDS, TSS, streamflow, ground-water/surface-water availability, or state-appropriated water rights.

Potential for impacts from acid-or-toxic forming materials is also addressed. The abandonment will include only steel product, and all remaining materials including hoses and fluids, will be removed. The specific locations of equipment are depicted on Plate 2.5.2-1. The Permittee describes the potential for acid and toxic forming materials to influence water quality on page 2-51c. It has been found that due to the high alkalinity and low acidity concentrations in the area, acid drainage problems do not occur. The corrosion potential of the steel used in long wall mining activities was assessed by the University of Utah Metallurgy Department with findings indicating it would take thousands of years for the metal to corrode away. Furthermore, given the subsurface environment of Utah, the general conditions to allow for corrosion processes do not exist.

aumarva

### Operation Plan

#### Spoil Waste Disposals of Noncoal Mine Wastes

##### *Analysis:*

The amendment meets the State of Utah R645 requirements for Noncoal Mine Waste Disposal.

Permittee has recently completed mining in the 8 Left through 15 Left district of Federal Coal lease UTU-67939, and is currently proposing to seal off that area. Most of the mining equipment has been removed from this area, and Permittee is now proposing that 137 conveyor pan-line sections be left underground citing safety concerns. These sections cannot be removed without endangering the lives of miners, and will therefore be abandoned. In anticipation of leaving the pan-line sections underground, all hoses and fluids have been removed. Only the steel structures will be left underground.

In 1998, a BLM commissioned study by the University of Utah focused on the corrosion potential of steel used in longwall mining systems. The results of that study concluded that it would take thousands of years for the metal in the reducing environment of a coal mine to corrode away. Consequently, it is not anticipated that the groundwater would be

contaminated by the abandoned equipment.

Plate 2.5.2-1\_rev. 7 has been included in this amendment, outlining the location of the proposed equipment to be abandoned.

jeatchel

## Hydrologic Ground Water Monitoring

### *Analysis:*

The amendment meets the State of Utah R645 requirements for Hydrologic Ground Water Monitoring.

The current ground water monitoring plan is sufficient to detect water quality impacts, if any, from the abandoned equipment. The groundwater monitoring plan includes site-specific sampling for field and/or lab analysis, including oil/gas detection.

aumarva

## Hydro Surface Water Monitoring

### *Analysis:*

The amendment meets the State of Utah R645 requirements for Hydrologic Surface Water Monitoring.

The current surface water monitoring plan is sufficient to detect water quality impacts, if any, from the abandoned equipment. The surface water monitoring plan includes site-specific sampling for field and/or lab analysis, including oil/gas detection.

aumarva

## Hydrologic Acid and Toxic forming Materials

### *Analysis:*

The application meets the State of Utah R645 requirements for Hydrologic Acid and Toxic Forming Materials.

Potential for impacts from acid-or-toxic forming materials is from abandoning equipment is addressed by the Permittee. The abandonment will include only steel product, and all remaining materials including hoses and fluids, will be removed. The specific locations of equipment are depicted on Plate 2.5.2-1. The Permittee describes the potential for acid and toxic forming materials to influence water quality on page 2-51c. It has been found that due to the high alkalinity and low acidity concentrations in the area, acid drainage problems do not occur. The corrosion potential of the steel used in long wall mining activities was assessed by the University of Utah Metallurgy Department with findings indicating it would take thousands of years for the metal to corrode away. Furthermore, given the subsurface environment of Utah, the general conditions to allow for corrosion processes do not exist.

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