GARY R. HERBERT
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Lieutenant Governor

State of Utah

DEPARTMENT OF NATURAL RESOURCES

MICHAEL R. STYLER
Executive Director

Division of Oil, Gas and Mining

JOHN R. BAZA
Division Director

January 2, 2019

Corey Heaps, Mine Manager
Canyon Fuel Company, LLC
HC 35 Box 380
Helper, Utah 84526

Subject: Swens Pad Interim Design, Canyon Fuel Company, LLC, Skyline Mine, C/007/0005, Task #5828

Dear Mr. Heaps:

The Division has reviewed your application. The Division has identified deficiencies that must be addressed before final approval can be granted. The deficiencies are listed as an attachment to this letter.

The deficiencies authors are identified so that your staff can communicate directly with that individual should questions arise. The plans as submitted are denied. Please resubmit the entire application.

If you have any questions, please call me at (801) 538-5350.

Sincerely,

Steve Christensen
Permit Supervisor

SKC/sqs
cc: Gregg Galecki, CFC
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Technical Analysis and Findings

Utah Coal Regulatory Program

PID:	**C0070005**
TaskID:	**5828**
Mine Name:	**SKYLINE MINE**
Title:	**SWENS PAD INTERIM DESIGN**

Operation Plan

Topsoil and Subsoil

Analysis:

The application meets the State of Utah R645-301-230 requirements for Soil Operation Plan, because the new installations are within the existing disturbed area from which topsoil and subsoil have been salvaged.

pburton

Hydrologic Sediment Control Measures

Analysis:

The amendment does not meet the State of Utah R645 requirements for Sediment Control Measures.

The amendment updates the Swens Canyon Shaft Pad Layout and sediment control measures implemented at the disturbed site. A sediment pond was initially designed to control sediment erosion from excavated material and contain cuttings produced at the surface during blind bore shaft construction. Blind bore shafts are built from the surface down to the workings and produce a significant amount of material as the shaft descends from surface downward. The ventilation shaft was instead constructed using the alternative raise bore technique outlined in the MRP. Using the raise bore method the large diameter shaft was built from the mine workings up to the surface. The excavated material and cuttings produced during the raise bore construction were gobbed underground and/or removed at the mine's portals. Since the raise bore shaft construction did not produce cuttings at the Swens Canyon disturbance area the cuttings pond was never developed.

The amendment proposes to remove the cuttings pond from the MRP because it was never developed. Drawing 3.2.4-4A proposes to remove the cuttings pond, but Appendix A-5, "Skyline Mine, Swen Canyon Ventilation Shaft Pad Design Report" is not amended to remove the narratives and calculations associated with the cuttings pond designs. This appendix shall be updated to reflect the methods and designs implemented at the pad to develop the shaft.

Deficiencies Details:

The amendment does not meet the State of Utah R645 requirements for Sediment Control Measures. The following deficiency must be addressed prior to final approval:

R645-301-740. The amendment must update Appendix A-5, "Skyline Mine, Swen Canyon Ventilation Shaft Pad Design Report" to reflect the methods used to construct the shaft. The amendment shall discuss using only the raise bore method to construct the Swen Canyon ventilation shaft. The calculations, narratives, and designs discussing the blind bore shaft construction method outlined within this appendix shall be removed from the text in order to accurately reflect the current as-built conditions on the ground.

kstorrar

Reclamation Plan

Topsoil and Subsoil

Analysis:

The application meets the State of Utah R645-301-240 requirements for Soil Reclamation Plan, because there is no change to the approved topsoil/subsoil handling plan.

pburton

Bonding Determination of Amount

Analysis:

The amendment does not meet the State of Utah R645 requirements for Determination of Bonding Amount.

The amendment proposes to address a potential increase of the reclamation bond by $35,000 as a result of adding an emergency hoist, fuel storage, a rescue building, and gravel storage to the Swens Canyon Ventilation Shaft pad. The bond increase results from the additional costs required to demolish and dispose of these new structures. Although the amendment provides adequate calculations addressing the demolition costs of these new structures, the earthwork calculations are less clear. In the MRP the differences between raise bore vs blind bore methods of building ventilation shafts is mentioned, noting that in the event of raise bore construction material will need to be imported to the site upon reclamation. Since the Swens Canyon Ventilation shaft was constructed via raise bore methods, there will be no excess fill at the collar, hence material will need to be imported to reclaim the shaft. Additionally, the earthwork calculations in the MRP propose separate intervals of engineered fill i.e. gravel, sand, bentonite, concrete, etc., but do not address the cost of importing these engineered fill materials to the site. The individual unit costs cannot be verified because the costs are hard keyed into the bonding tables without any reference provided.

Deficiencies Details:

The amendment does not meet the State of Utah R645 requirements for Determination of Bonding Amount. The following deficiency must be addressed prior to final approval:

R645-301-830 - Since there is no excess fill at the collar, material will need to be imported to reclaim the shaft upon reclamation. Further, the MRP proposes separate intervals of engineered fill i.e. gravel, sand, bentonite, concrete, etc., but does not address the cost of importing these engineered fill materials to the site. The individual unit costs for the engineered fill provided in the MRP cannot be verified because they are hard keyed into the bonding tables without any reference provided. Permittee must address the cost of importing engineered fill to the ventilation shaft upon reclamation, and provide approved references in the bonding calculations.

jeatchel