



Suzanne Steab <suzannesteab@utah.gov>

2018 Annual Report Review Completion

Suzanne Steab <suzannesteab@utah.gov>
To: Gregg Galecki <ggalecki@wolverinefuels.com>
Cc: Priscilla Burton <priscillaburton@utah.gov>

Thu, Jun 20, 2019 at 2:04 PM

Hello Gregg,

The Division staff have completed the review of the 2018 Annual Report for the Skyline Mine. Attached is a copy of the review with comments.

No hard copy will follow.

Thank you for your diligence in completing the Annual Report.

--

Suzanne Steab, Engineering Technician II
Division of Oil, Gas & Mining
1594 West North Temple, Suite 1210
Salt Lake City, Utah 84114-5801
(801) 538-5265

 **Skyline.pdf**
48K

2018 ANNUAL REPORT

Submit the completed document and any additional information identified to the Division by March 31, 2019.

GENERAL INFORMATION

Company Name	Canyon Fuel Company, LLC	Mine Name	Skyline Mine
Permit Number	C/007/0005	Permit Expiration Date	April 30, 2022
Operator Name	Gregg A. Galecki	Phone Number	+1 (435) 448-2636
Mailing Address	HC 35 Box 380	Email	ggalecki@wolverinefuels.com
City	Helper		
State	Utah	Zip Code	84526

DOG M File Location or Annual Report Location

Excess Spoil Piles	<input type="checkbox"/> Required <input checked="" type="checkbox"/> Not Required	
Refuse Piles	<input checked="" type="checkbox"/> Required <input type="checkbox"/> Not Required	Quarterly Certified Refuse Pile Inspection reports were submitted electronically to the Division on 4/19/18, 8/10/18, 11/2/18, and 2/4/19 for the 1st through 4th quarters, respectively.
Impoundments	<input checked="" type="checkbox"/> Required <input type="checkbox"/> Not Required	Quarterly Certified Pond Inspection reports were submitted electronically to the Division on 4/19/18, 8/10/18, 11/2/18, and 2/4/19 for the 1st through 4th quarters, respectively.
Other:		

OPERATOR COMMENTS

REVIEWER COMMENTS Met Requirements Did Not Meet Requirements

4/3/2019, PB. Refuse inspections are filed under the following dates: 3/7/2018 (no deposition) , 6/29/2018 (180 tons hauled), 9/29/2018 (no deposition) and 2/4/2019 (12,296 tons hauled in the 3rd quarter). Pond inspections are filed under the 3/19/2018, 8/09/2018, 11/2/2018, and 2/4/2019 dates.

zone for great horned owls. No other nests were observed during the survey periods. No American three-toed woodpeckers were observed. Golden eagle observations were limited to sightings of soaring individuals, mostly over Flat and Huntington Canyons. TM

Title: MACROINVERTEBRATE SURVEYS

Objective: To determine if mining and mining related activities are impacting Eccles Creek.

Frequency: Conduct studies in the fall for two consecutive years then two years off.

Status: Surveys due 2019/2020

Reports: Annual

Citation: Appendix A-3, Volume 2, Volume 1A, Section 2.8, pages 2-70-2-71C Section 2.8, Table 2.8-1a

OPERATOR COMMENTS

Macroinvertebrate surveys are scheduled for 2019.

REVIEWER COMMENTS Met Requirements Did Not Meet Requirements

No macroinvertebrate surveys were required for 2018. Surveys are scheduled for 2019 and must also be completed in 2020. TM

Title: FISH SURVEY

Objective: To determine if mining and mining related activities are impacting fish in Eccles Creek.

Frequency: In the fall every three years.

Status: Survey due 2019

Reports: Every three years

Citation: MRP, Volume 1A, Section 2.8, page 2-71d

OPERATOR COMMENTS

Fish surveys are scheduled for 2019.

REVIEWER COMMENTS Met Requirements Did Not Meet Requirements

No fish surveys were required in 2018. Surveys are scheduled for 2019 and must be completed again in 2022. TM

Title: SUBSIDENCE MONITORING**Objective:** To document the amount of subsidence that has occurred.**Frequency:** Annually**Status:** Ongoing**Reports:** Annual Update of Drawing 4.17.3-1 and digitized area survey information and results of on the ground visual inspection.**Citation:** Chapter 4, page 4-97 thru 4-99a**OPERATOR COMMENTS**

The Cumulative Subsidence 1982 - 2018 map is attached. Note that since aerial flights are conducted in the summer not all of the 2018 potential subsidence is documented. Visual ground inspections of the 2018 full extraction mining areas was done in September-October in conjunction with water monitoring; no hazardous conditions were observed during the inspections.

REVIEWER COMMENTS Met Requirements Did Not Meet Requirements

The cumulative subsidence map depicts an overall subsidence profile for all areas of the mine going back to 1982. Subsidence contours are clustered tightly around the areas that have experienced a high degree of vertical subsidence. The majority of subsidence is relatively minor, ranging between 2 and 4 feet. The maximum amount of subsidence is approximately 20 feet and occurs at the head of the South Fork Eccles Canyon. This map has been stamped and signed by Gregg Galecki, Licensed Professional Geologist in the State of Utah. JE

Title: SUBSOIL SAMPLING AT WASTE ROCK SITE**Objective:** To provide chemical characteristics of purchased subsoil.**Frequency:** Once. Sample purchased subsoil for parameters in Table 1 of the Utah 1988 Guidelines.**Status:** Ongoing with contemporaneous reclamation at the waste rock site.**Reports:** None specified. Suggest verbal communication with Division and lab analysis to be included in bond release application.**Citation:** Volume 3, Section 4.6.4.1, page 4-38a and page 4-38b**OPERATOR COMMENTS**

No contemporaneous reclamation was conducted at the Waste Rock site in 2018 and no subsoil was purchased.

REVIEWER COMMENTS Met Requirements Did Not Meet Requirements**Title: AGE-MONITORING OF WATER****Objective:** To understand the possible sources of groundwater inflows.**Frequency:** When inflows of 800 gpm are encountered.**Status:** No significant inflows in the North Lease.**Reports:** Immediately notify Division**Citation:** Volume 1, page 2-35b**OPERATOR COMMENTS**

No significant inflows were encountered while conducting mining operations in 2018.

REVIEWER COMMENTS Met Requirements Did Not Meet Requirements

The Annual Report meets the State of Utah R645 requirements for Hydrology.

The Permittee has complied with commitments within the water monitoring program for the Skyline Mine. The mine has not experienced major inflows (>800gpm) while mining in the Flat Canyon Lease. The mine submits water quality data every quarter as required in the MRP. KS

Title: SAMPLING PRIOR TO SLURRY PLACEMENT IN ABANDONED UNDERGROUND WORKINGS

Objective: Protection of groundwater

Frequency: Every 450 feet of advance

Status: Report if placed slurry in abandoned underground workings.

Reports: Notification if parameters are out of compliance with Guidelines for Topsoil and Overburden.

Citation: Volume 2, Incorporation of 97K-1 and Section 1.2 (at the end of section 3.2)

OPERATOR COMMENTS

No slurry was placed in abandoned underground workings in 2018.

REVIEWER COMMENTS

Met Requirements

Did Not Meet Requirements

Title: MONITORING OF REFERENCE AREAS

Objective: Determine condition class of reference site to ensure the site is still appropriate for "reference"

Frequency: During last 2 years of mining leading up to reclamation

Status: Overdue

Reports: Submit evaluation of all reference areas with determination of condition class as established by the NRCS.

Citation: Chapter 4, Page 4-47

OPERATOR COMMENTS

Section 4.7 of the M&RP on pages 4-46 and 4-47 were modified on 8-15-16 to clarify assessing the conditions of the reference areas prior to reclamation. Reference area class conditions will be assessed per the citations on said pages. No NRCS work is necessary and no evaluations are overdue per the current M&RP. Ongoing monitoring of the Reference Areas is not a commitment in the M&RP. Please modify both this section and the section below (Future Commitments and Conditions) to reflect that evaluations of the Reference Areas are not a commitment in the permit.

REVIEWER COMMENTS

Met Requirements

Did Not Meet Requirements

Section 4.7.5 of the MRP (page 4-47) was modified in 2016 to amend the reference area monitoring commitment. The MRP now requires evaluating the reference areas during the last two years of mining and before any initial restoration is begun in order to ensure the adequacy of the reference areas for establishing reclamation success standards. The status of this commitment is not overdue and will be changed to reflect that on future reports. Evaluation of the reference areas during the last two years of mining, prior to the initiation of final restoration efforts, remains a future commitment in the MRP. TM

FUTURE COMMITMENTS AND CONDITIONS

The following commitments are not required for the current annual report year, but will be required by the permittee in the future as indicated by the "status" field. These commitments are included for information only, and do not currently require action. If you feel that the commitment is no longer relevant or needs to be revised, please contact the Division.

Title: TOPSOIL SAMPLING

Objective: To determine fertilizer application rate.

Frequency: At final reclamation sample redistributed topsoil for N, P, K, Fe, Mg, Mn, Zn, Ca and pH.

Status: At final reclamation

Reports: None specified. Suggest verbal communication with Division and lab analyses to be included in bond release application.

Citation: Section 4.5, page 4-32

Title: SAMPLING OF WASTE ROCK IN TEMPORARY STOCKPILES

Objective: Protection of surface and groundwater

Frequency: one sample per 2000 tons of temporary stockpiled material if remains in temporary location longer than three months.

Status: Ongoing

Reports: Not specified. Assumed to be the same as disposal site sampling (previous paragraph on same page.)

Citation: Volume 3, page 4-30 and 1988 Soils Guidelines, Table 6

Title: MONITORING OF REFERENCE AREAS

Objective: Determine condition class of reference site to ensure the site is still appropriate for "reference"

Frequency: During last 2 years of mining leading up to reclamation

Status: Ongoing

Reports: Submit evaluation of all reference areas with determination of condition class as established by the NRCS.

Citation: Chapter 4, Page 4-47

REPORTING OF OTHER TECHNICAL DATA

Please list other technical data or information that was not included in the form above, but is required under the approved plan, which must be periodically submitted to the Division.

Please list attachments:

Baseline Riparian Vegetation Reports for Little Swens, Swens, and Upper Huntington creeks are attached as Acrobat files R1Report_SwensRiparian, R2Report_LittleSwensRiparian, and R3Report_UpperHuntingtonRiparian; respectively. The vegetation surveys were conducted as baseline surveys as outlined on page 2-63a1, Section 2.7 of the approved M&RP.

REVIEWER COMMENTS Met Requirements Did Not Meet Requirements

Baseline vegetation surveys were conducted for Swens Canyon, Little Swens Canyon, and Upper Huntington Creek to fulfill a requirement in Section 2.7, page 2-63a1, to collect baseline riparian vegetation data prior to undermining various creeks. TM

