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State of Utah

DEPARTMENT OF NATURAL RESOURCES

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Division of Oil, Gas and Mining

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February 12, 2020

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

Subject: Huntington Canyon Water Monitoring Program, Canyon Fuel Company, LLC, Skyline Mine, C/007/0005, Task #6056

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 by March 13th, 2020.

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

Sincerely,

Steve Christensen
Coal Program Manager

SKC/sqs

cc: Gregg Galecki, CFC

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Technical Analysis and Findings

Utah Coal Regulatory Program

PID: C0070005
TaskID: 6056
Mine Name: SKYLINE MINE
Title: HUNTINGTON CANYON WATER MONITORING PROGRAM

Summary

This hydrologic monitoring amendment is updated in response to Division review and comment on Task 6012 in December 2019. The hydrologic monitoring amendment updates the narrative and tables in the Mining and Reclamation Plan (MRP) Chapter 2, Section 2.3 Ground Water Hydrology; and updates Plate 2.3.6-1 Hydrologic Monitoring Stations, and Plate 2.3.6-3 Mine Inflows with details of the Huntington Canyon Water Monitoring Program (HCWMP). The HCWMP is included for incorporation into the MRP as Chapter 2 Attachment 2.3-1.

This amendment revises the bond information which is found in MRP Chapter 4, Section 4.3.

pburton

General Contents

Permit Application Format and Contents

Analysis:

The application does not meet the State of Utah R645 requirements for Permit Format: Clear and Concise.

The C2 form should indicate that bonding information updates Section 4.3, not section 4.2.

Table 2.3.7-5 refers to Mine 5 Mains as the source of inflow, but the location is described as Mine #4 on Dwg 2.3.6-3. In addition, the asterisk on Table 2.3.7-5 should state that sites 1-9 are shown on Dwg 2.3.6-3.

Deficiencies Details:

The application does not meet the State of Utah R645 requirements for Clear and Concise. The following deficiency must be addressed prior to final approval:

R645-301-121.200, **(1)** The C2 form should indicate that bonding information updates Section 4.3, not section 4.2. **(2)** Table 2.3.7-5 refers to Mine 5 Mains as the source of inflow, but the location is described as Mine #4 on Dwg 2.3.6-3. Please make the appropriate correction. **(3)** The asterisk on Table 2.3.7-5 should state that sites 1-9 are shown on Dwg 2.3.6-3.

pburton

Operation Plan

Hydrologic Ground Water Monitoring

Analysis:

The amendment does not meet the State of Utah R645 Hydrologic: Ground Water Monitoring.

On January 10, 2020 the Permittee submitted an amendment to the Skyline MRP to revise the ground and surface water monitoring program. This was previously reviewed under Task ID 6012. The revision includes incorporating portions of the Huntington Canyon Water Monitoring Program (HCWMP) into the existing water monitoring program. Included in the amendment, related to hydrology, are updates to section 2.3 of the MRP, updates to Plates 2.3.6-1 and 2.3.6-3 as well as the addition of Attachment 2.3-1. As part of the HCWMP the Permittee will be conducting monitoring that will be incorporated into their MRP's water monitoring program. PacifiCorp, one of the HCWMP parties, will also be conducting their own monitoring on sites located nearby and this data will be provided to the Division by the Permittee as a courtesy when available.

Section 2.3 of the MRP was updated and clarified from the previous submittal under Task ID 6012. The Permittee has committed to updated the MRP Table 2.3.7-5 of sustained underground mine in-flows of greater than 200 gpm once a year.

Tables 2.3.7-1 and 2.3.7-3 were both updated to clear up confusion around monitoring requirements and site naming inconsistencies. All sites now clearly state whether they will have continuous monitoring and/or quarterly monitoring. Table 2.3.7-6 was added to list reporting requirements of continuous and quarterly monitoring data from HCWMP sites. Continuous monitoring data will be provided in spreadsheet form to the Division as the Division water monitoring database is not set up to be able to import continuous data.

Plate 2.3.6-1 has been updated to clearly show the new monitoring site locations.

Section 2.3 was updated to justify the removal of spring monitoring site SW32-276. This site was added as a monitoring location during a field visit to the area around the 2016 time frame but could not be located again after that visit. This site has not been undermined and monitoring will continue at the nearby spring monitoring site SW32-277.

In addition to the updated monitoring sites added due to the HCWMP, the Permittee has removed well monitoring location W79-10-1B located within a lease to the north west of the mine surface facilities. The Permittee must justify the removal of this well from the monitoring program.

Deficiencies Details:

The amendment does not meet the State of Utah R645 requirements for Ground Water Monitoring. The following deficiencies must be addressed prior to final approval:

R645-301-731.212 Justification for the removal of monitoring site W79-10-1B must be added to the MRP indicating why groundwater monitoring is no longer necessary in this location. This includes analysis of current and historical data.

adaniels

Reclamation Plan

Bonding Determination of Amount

Analysis:

The application meets the R645 requirements for Determination of Bonding Amount.

This was previously found to be deficient because of an arithmetic error that was discovered in the Demolition section of the bond. In addition to the arithmetic error, an escalation factor of 2.32% needed to be applied to the calculations within the Bond Summary sheet. As noted in the cover letter of this submittal, both of these corrections have been applied within the recently submitted Midterm Response (Task# 6055) on January 3, 2020.

jeatchel