



State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

Norman H. Bangarter
Governor

Dee C. Hansen
Executive Director

Dianne R. Nielson, Ph.D.
Division Director

355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203
801-538-5340

January 28, 1992

Mr. Bob Eccli
U. S. Fuel Company
P. O. Box A
Hiawatha, Utah 84527

Dear Mr. Eccli:

Re: Administrative Completeness Review, Permit Renewal, U. S. Fuel Company,
Hiawatha Complex, ACT/007/011, Folder #3, Carbon County, Utah

An initial review of your permit renewal application has been conducted by the Division. Submitted materials are adequate to determine the Permit Application Package apparently complete for publication purposes. At this time you should publish a Notice of Complete Permit Application as required by R645-300-121.100. A notarized proof of publication should be sent to the Division as soon as it is available.

Copies of your permit application package must be made available to other agencies. You should submit 12 additional copies of your plan as soon as possible for distribution.

The Division is currently reviewing your application for technical completeness. Results of that review will be forwarded to you shortly. Any outstanding technical deficiencies will need to be addressed prior to permit renewal. If you have any questions don't hesitate to call.

Sincerely,

A handwritten signature in black ink, appearing to read "Daron R. Haddock".

Daron R. Haddock
Permit Supervisor

Enclosure
HIAWPUBL.DRH



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January 13, 1992

TO: Daron R. Haddock, Permit Supervisor

FROM: Wayne H. Western, Reclamation Engineer *W HW*

RE: Check of MRP Administrative Completeness Review, Chapter 5 (Engineering), U. S. Fuel Company, Hiawatha Mines, ACT/007/011, Folder #2, Carbon County, Utah

SUMMARY

On January 8, 1992 I received a checklist that indicated what engineering regulations had been addressed in U. S. Fuel's Hiawatha Mines MRP, Chapter 5. At your request I checked the other chapters to determine if they contained the missing information. I listed regulations that were not addressed in Chapter 5, but were addressed in other chapters.

GENERAL ANALYSIS OF CHAPTER 5

The Operator has addressed most of the engineering regulations, however many of the regulations have not been adequately addressed and will not pass the technical review.

Steve Demczak has noted what engineering regulations were not discussed in Chapter 5. I have noted the engineering regulations that have been addressed in other chapters. (See attachment.) There is enough information to begin the technical review.

GENERAL RECOMMENDATION

Allow the Operator to publish and give public notice of the intent to renew their mining permit. The Operator should be notified that many parts of the MRP are inadequate and need to be modified.

ANALYSIS OF EACH ENGINEERING REGULATION NOT ADDRESSED IN CHAPTER 5, BUT MENTIONED IN OTHER CHAPTERS

All of the regulations addressed in this analysis were listed as not being addressed in Chapter 5:

R645-301-511.100

The proposed coal mining and reclamation operations with attendant maps, plans, and cross sections

Analysis:

Each permit application will include a description of the proposed coal mining and reclamation operations with attendant maps, plans, and cross-sections.

Reclamation operational plans are mentioned in Chapter 4 under Reclamation Plan. The plan has few details and there are no maps or drawings.

Recommendation:

Applicant should be required to supply maps and drawings that will be used to implement the reclamation plan.

R645-301-511.200

The proposed mining operation and its potential impacts to the environment as well as methods and calculations utilized to achieve compliance with design criteria; and

Analysis:

The Applicant did not include a description of the potential impact to the environment as well as method and calculations utilized to achieve compliance with design criteria.

Recommendation:

Applicant needs to supply the information.

R645-301-511.300
Reclamation

Analysis:

Each permit application will include a description of the proposed mining operations and its potential impact to the environment, as well as methods and calculations utilized to achieve compliance with reclamation. The environmental impact of the reclamations work is not presented.

Recommendation:

Applicant needs to supply the information.

R645-301-512.120
Surface facilities and operations as described under R645-301-521.124, R645-301-521.164, R645-301-521.165 and R645-301-521.167

Analysis:

Surface facilities and operations are not mentioned in any text. Exhibit V-9 does show some surface facilities.

Recommendation:

Surface facilities and operations are addressed in Exhibit v-9, but the information is inadequate to pass the technical review.

R645-301-512.130
Surface configurations as described under R645-301-542.300 and R645-302-200

Analysis:

Certified maps of the surface configuration are presented in Chapter 4.

Recommendation:

The surface configuration maps are not at a scale small enough to be useful for most engineering work.

R645-301-512-140
Hydrology as described under R645-301-722 and as appropriate, R645-301-731.700

Analysis:

Certified maps used for hydrologic work are presented in Chapter 7.

Recommendation:

Maps appear adequate for administrative review.

R645-301-512.150
Geologic cross sections and maps as described under R645-301-622

Analysis:

Certified maps used to geologic work are presented in Chapter 6.

Recommendation:

Maps appear adequate for administrative review.

R645-301-512.200 to .260
Plans and Engineering Designs

Analysis:

Plans and engineering designs of excess spoil, durable rock fill, coal mine waste, impoundments, primary rock and variances from approximate original contour require certification by a qualified registered professional engineer. Some of the impoundment and primary road designs have been certified by a registered professional engineer. The excess spoils, durable rock fills, coal mine waste, and variances from approximate original contour designs have not been certified, or are not included.

Recommendation:

There is enough information in the plans to begin a technical review, however more information and certification is needed before the technical review can be completed.

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R645-301-521.124

The location and size of existing areas of spoil, waste, coal development waste, and noncoal waste disposal, dams, embankments, other impoundments, and water treatment and air pollution control facilities within the proposed permit area. The map will be prepared and certified according to R645-301-512; and

Analysis:

A certified map showing the locations and size of existing areas of spoil, waste, coal development waste, and non coal waste disposal, dams, embankments, other impoundments, water treatment and air pollution control facilities within the permit area. Exhibit V-9 is a certified map showing the location of some of these facilities.

Recommendation:

There is enough information for the administrative completeness review, but the drawings will not pass the technical review.

R645-301-521.130 to .131

Landowners and right of entry and public interest maps.

Analysis:

Maps and written descriptions of surface and mineral ownership are presented in Exhibit IV-1; IV-2; and Table I-1.

Recommendation:

The maps and text are adequate to pass the administrative review.

R645-301-521.150 to .151

Land surface configuration maps.

Analysis:

These regulations deal with land surface configuration maps. There are U.S.G.S. topographic maps and other detailed topographic maps associated with structure, fill and

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impoundment.

Recommendation:

The topographic map provided may meet the administrative review requirements, but they will not pass the technical review.

R645-301-521.170
Transportation Facilities Maps.

Analysis:

Transportation facilities maps are required to show roads, conveyors and rail systems. The Applicant has provided maps that show some of these facilities.

Recommendation:

The maps meet the administrative completeness review requirement, but not the technical review criteria.

R645-301-525.120

A description of the physical conditions, such as depth of cover, seam thickness, and lithology, which affect the likelihood or extent of subsidence and subsidence-related damage;

Analysis:

A description of the physical condition, such as depth of cover, seam thickness, and lithology, which affect the likelihood or extent of subsidence and subsidence-related damage. These issues are addressed in Chapter 6 (Geology).

Recommendation:

The geologic information is sufficient to meet the administrative requirements.

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R645-301-525.133

Leaving areas in which no coal is removed, including a description of the overlying area to be protected by leaving the coal in place;

Analysis:

Leave areas in which no coal is removed and the surface area to be protected. This issue is addressed conceptually in Chapter 4; however, there are no specific areas mentioned.

Recommendation:

The Applicant has vaguely addressed this issue. While the administrative requirements may barely be met the technical review will require more detail.

HIAWMRP.WW