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State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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TO: Daron Haddock, Permit Supervisor

FROM: Wayne H. Western, Reclamation Engineer *WHW*

DATE: November 12, 1993

RE: Alternate Borrow Sites, U.S. Fuel Company, Hiawatha Mines, ACT/007/011, Folder #2, Carbon County, Utah

SUMMARY

The Applicant proposes to obtain 95,000 cubic yards of borrow from two alternate sites, which are located closer to the reclamation area than those currently approved. By using the alternate site the Applicant hopes to reduce his transportation expenses.

The permit application only addresses the soil regulations. I will comment on the engineering and bonding information presented in the application, but the Applicant must address all relevant regulations before approval.

R645-301-533.100 Impoundments not meeting the size of other criteria of 30 CFR 77.216(a), will have a minimum static safety factor of 1.3 for normal pool with steady state seepage saturation conditions or meet the requirements of R645-301-733.210

Applicant's Proposal:

The Applicant did not address this regulation.

Analysis:

30 CFR 77.216 (a) applies to structures that can store more than 20 acre-feet of water or have the embankments greater than 20 feet high. The total pond capacity for the sediment pond at alternate site E is 1.38 acre-feet and the pond at site F is 6.7 acre-feet. Since the storage capacity of both ponds is less than 20 acre-feet they do not meet the storage requirements of 30 CFR 77.216 (a).



The embankment height must be shown on the cross-sections. The information is essential for finding the safety factors. That dimension should be included in the drawings. There is no mention of static safety factor. The ponds need to have a static safety factor of at least 1.3.

1. The Applicant must address the general requirements of R645-301-533.
2. The Applicant must prove that the embankment's static safety factor is at least 1.3.
3. The Applicant must list the embankment heights on each cross-section.

R645-301-533.330 Slope protection will be provided to protect against surface erosion at the site and protect against sudden drawdown.

Applicant's Proposal:

The Applicant did not address this regulation.

Analysis:

The Applicant must prove that the ponds are protected against sudden drawdown. A description of the erosion protection system must be included in the application.

Deficiencies:

1. The Applicant must prove that the pond is protected from erosion and sudden drawdown.

R645-301-540	Reclamation Plan
R645-301-541	General
R645-301-542	Narratives, Maps and Plans
R645-301-542.100	A detailed timetable for the completion of each major step in the reclamation plan.

Applicant's Proposal:

Table II-31 is a timetable describing the reclamation activities on the substitute topsoil

borrow site. In year one the operations at the Hiawatha facilities will cease. At the beginning of year two cutoff ditches and sediment ponds will be installed. There is no mention of removing the sediment ponds and other sediment control structures.

Analysis:

The Applicant did not state when the sediment control structures would be removed. Since the sediment control structures have not been approved for post mining land use they must be removed before bond release. R645-301-542.500 specifically requires that a timetable, and plan to remove each proposed sedimentation pond be included in the reclamation plan.

Deficiencies:

1. The Applicant will state in the reclamation time table the approximate dates when the sediment control structures will be removed.

R645-301-542.200 A plan for backfilling, soil stabilization, compacting and grading, with contour maps or cross sections that show the anticipated final surface pattern of the proposed permit area

Applicant's Proposal:

The Applicant did provide a surface map that shows the contours after final grading. Cross sections were omitted for the application.

Analysis:

The Applicant needs to include cross sections of the alternative borrow sites. R645-301-542.300 also requires cross section for the final surface.

Deficiencies:

1. The Applicant will provide the Division with cross sections that depicts slopes of the alternative borrow areas.

R645-301-542.800 The reclamation plan for the proposed coal mining and reclamation operations will also include a detailed estimate of reclamation costs as described in R645-301.830.100 - R645-301-830.300

Applicant's Proposal:

The Applicant did not address this regulation.

Analysis:

The Applicant must supply the Division with a detailed cost estimate for reclaiming the alternative borrow sites. If the alternative borrow site reclamation significantly increases the reclamation costs then a bond adjustment must be made.

Deficiencies:

1. The Applicant will provide the Division with a detailed cost estimate for reclaiming the alternate borrow sites.

BORROW.WHW