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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 *W H W*
DATE: September 27, 1993
RE: Technical Review, Utah Fuel Company, Hiawatha Mines, ACT/007/011, Folder #2, Carbon County, Utah

R645-301-537 Regraded Slopes
R645-301-537.100

Applicant's Proposal:

No alternative specifications are proposed.

Analysis:

The Applicant does not propose any alternative specifications.

Remaining Deficiencies:

None.

R645-537.200 For the purpose of UNDERGROUND COAL MINING AND RECLAMATION ACTIVITIES, regrading of settled and revegetated fill to achieve approximate original contour at the conclusion of mining operation will not be required if the following condition are met

Applicant's Proposal:

As provided by this rule, U.S. Fuel is proposing to not restore the canyon access roads to approximate original contour. Justification is given in rules 537.210 through 537.250 below and in R645-302-270 addressed in Appendix IV-7 of Chapter IV.



Analysis:

Only parts of the access road do not meet approximate original contour (AOC) requirements. The Applicant must identify each area that currently does not meet AOC requirements and why a variance should be granted. Once the areas have been identified and the request for the variance has been made then the Division can evaluate the request.

The Applicant has not demonstrated to the Division that all of the requirements of section R645-301-537.200 to R645-301-537.250 have been met. There was no information supplied to the Division that demonstrated through standard geotechnical analysis that a safety factor of the areas is 1.3 or greater or that the vegetation has met the reclamation standards.

If the Applicant fails to obtain an AOC variance then the roads must be reclaimed to AOC standards.

Deficiency:

1. The Applicant needs to describe the location of all stabilized and revegetated fills for, which a variance from AOC requirements is sought, on a map that has a scale of 1 inch equals 50 feet or less.
2. The Applicant must demonstrate that all of the requirements of section R645-301-537.200 to R645-301-537.250 have been met. Specifically the Applicant must demonstrate that the vegetation requirement have been achieved and that the slopes have a safety factor of at least 1.3.

R645-301-537.210

Applicant's Proposal:

The settled and revegetated fills comprising the access road grades and out slopes consist of natural material derived from the immediate location of the roads.

Analysis:

The settled and revegetated fill meets the requirements of being spoil or nonacid or nontoxic forming underground development waste.

Deficiencies:

None.

R645-301-537.220

Applicant's Proposal:

The spoil associated with the roads has not been located so as to be detrimental to the environment, to the health and safety of the public, or to the proposed postmining land use.

Analysis:

The spoil associated with the roads has been located to prevent harm to the environment or cause health and safety problems.

Deficiencies:

None.

R645-301-537.230

Applicant's Proposal:

The stability of the existing road grades and outslopes has been demonstrated to be consistent with backfilling and grading requirements as evidenced by 20 to 45 years of continual use without any signs of instability.

Analysis:

R645-301-537.230 states that the stability of the spoil or underground development waste will be demonstrated through standard geotechnical analysis to be consistent with backfilling and grading requirements for materials on solid bench (1.3 static safety factor) or excess spoil requirements for material not placed on a solid bench (1.5 static safety factor). The regulation requires that a geotechnical analysis be performed and that slope have a minimum safety factor. The Applicant has not provided the Division with such an analysis. Many slopes have safety factors less than 1.3, but do not show signs of instability.

Deficiencies:

1. The Applicant will provide the Division with a geotechnical analysis that demonstrates that materials placed on a solid bench have a static safety factor of 1.3, or if the materials are not placed on a solid bench they must have a static safety factor of 1.5.

R645-301-537.240

Applicant's Proposal:

The reclaimed surface of the roads will be vegetated according to R645-301-356 and 357 (see Chapter III). Surface runoff will be controlled by existing structures to be left in place.

Analysis:

The Applicant has not demonstrated in this section that the vegetation has met the requirements of R645-301-356 and 357. A report by a qualified biologist must be included in the mine plan that demonstrates that the vegetation meets or exceeds the reclamation standards.

The Applicant must show that the surface runoff will be controlled in accordance with R645-301-742.300

Deficiencies:

1. The Applicant must demonstrate that the vegetation requirements of R645-301-356 and 357 have been met.
2. The Applicant must demonstrate that surface runoff will be controlled in accordance with R645-302-742.300. If Applicant is unable to meet the requirement of R645-301-356 and 357 then the slope must meet AOC standards.