

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

May 30, 2013

TO: Internal File

THRU: James Owen, Lead *JCO*

FROM: Priscilla Burton, Soil Scientist *PWB by SRS*

RE: Pond 5A Temporary Access Road, Hiawatha Coal Company, Hiawatha Complex, C/007/0011, Task ID #4333

SUMMARY:

Revisions to the Hiawatha Mining and Reclamation Plan were received on May 14 2013. The revision outlines construction of a temporary access road from County Rd across the northwest corner of reclaimed slurry pond 5 into active sediment pond 5A for the purpose of loading and hauling coal fines for sale as a product. Pages 5-10 and p. 5-70A in App V-17 have been revised. The following plates have been revised to show the location of the access road: Ex V-9, V-9A, Ex VII-18A, and Ex 8-1A.

Slurry pond 5A was re-mined beginning in 2007 (pg 5-29, dated 2007). Slurry pond 5A is also used for run-off control (pg. 5-64) and will be the last structure to be reclaimed (pg. 5-78). Re-mining of the slurry pond is advantageous to the reclamation plan. Prior to approval, the following information is requested, in accordance with:

R645-301-244.200, The amount of mulch applied to the reclaimed site should be increased, based upon documented erosion of reclaimed sites using the 1 ton/acre mulch application. The Division recommends the application of 1.5 ton/acre hay mulch incorporated into the soil with surface roughening and 1500 pounds of wood fiber mulch applied a hydroseeder.

R645-301-521.165 and R645-301-521.270, The acreage of slurry pond 5 to be re-disturbed should be disclosed. Within this reclaimed slurry pond area, the cover soil should be removed and stockpiled. Locations of the topsoil stockpile should be shown on a map and marked with a sign.

R645-301-521.251, Disturbance Area markers should be placed along the reclaimed, slurry pond 5 to protect the phase 1 bond release area from construction activity.

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TECHNICAL ANALYSIS:

OPERATION PLAN

TOPSOIL AND SUBSOIL

Regulatory Reference: 30 CFR Sec. 817.22; R645-301-240.

Analysis:

Redistribution

Excluding roads, there are 221.36 disturbed acres in the lower Hiawatha area (Sec. 241, p 37). Page 2-37 reports 106.5 acres have been reclaimed and Table II-13 itemizes the remaining reclamation work to be completed, including those areas not listed on page 2-37, such as Slurry Pond 5A. Table III-3 lists approximately 112 acres within the lower Hiawatha area that will not be reclaimed as follows: roads 30.3 acres; railroad yard 15.2 acres; town 66.3 acres. The areas of reclamation in the vicinity of the preparation plant are illustrated on Exhibit II-4. Exhibit II-4A and pg. 2-37 provides the status of reclaimed and affected lands as of 2008 as follows:

- 26.37 acres of the 26.37 acre slurry pond 4/refuse pile 2 reclaimed;
- 5.51 acres of the 23.87 acre preparation plant reclaimed;
- 9.12 acres of Borrow Area F (all) reclaimed;
- 40.39 acres of the 40.39 acre Slurry pond 5 main cell reclaimed (15.51 acres remain active as a sediment basin as reported in Table II-13);
- 19.83 acres of the 29.11 "Affected" acres (in the preparation plant vicinity) reclaimed.

A total of 106.5 acres received Phase I bond release in January 2009 as detailed on page 2-37 of the MRP, Section 241. According to information on page 2-37, that leaves 39.23 acres to be reclaimed in the lower Hiawatha area. Exhibit II-4A provides a reference for the location of the reclaimed and remaining acres identified on page 2-37.

Earthwork (including seeding) at the Slurry pond 4/Refuse Pile 2, Slurry Pond 5 Main Cell, a portion of the Preparation Plant, and Borrow areas A and F was undertaken during the years 1996 – 2001 (according to Division records and the 2005 Annual Report).

Slurry pond 5 (main cell) was re-mined and the embankments were pushed inward to a grade of 5h:1v. (2-39). Refuse in Slurry pond 5 was sampled on September 25, 1996 by the Division and Dan Guy, Blawhawk Engineering (consultant to US Fuel). The results of the refuse analysis are included in Appendix VII-18. As a result of these analyses, the Division