

#4371

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# TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

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June 25, 2013

TO: Internal File

THRU: Steve Christensen, Permit Supervisor *sc*

FROM: James Owen, Engineer, Team Lead *JO*

RE: Pond 5A Temporary Access Road, Hiawatha Coal Company, Hiawatha Mine, Permit C/007/0011, Task ID #4371

## **SUMMARY:**

On June 10, 2013, the Utah Division of Oil Gas & Mining received an application for an amendment to the Mining & Reclamation Plan (MRP) of the Hiawatha Mine. The application seeks approval to construct a temporary access road to allow truck access to the interior of the Slurry Pond Cell 5A for the purpose of extracting coal fines.

This memo addresses the application's compliance with the administrative (R645-301-100) engineering (R645-301-500) and bonding (R645-301-800) sections of the Utah Coal Mining Rules. Contents and information provided are sufficient enough to meet the minimum requirements of this section of the Utah Coal Mining Rules. No deficiencies were identified.

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**TECHNICAL ANALYSIS:**

**GENERAL CONTENTS**

**COMPLETENESS**

Regulatory Reference: 30 CFR 777.15; R645-301-150.

**Analysis:**

Appendix V-17: Pond 5A was included with the submittal. The appendix details the construction, maintenance, and reclamation of the access road.

**Findings:**

Contents and information provided are sufficient enough to meet the minimum requirements of this section of the Utah Coal Mining Rules.

**OPERATION PLAN**

**ROAD SYSTEMS AND OTHER TRANSPORTATION FACILITIES**

Regulatory Reference: 30 CFR Sec. 784.24, 817.150, 817.151; R645-301-521, -301-527, -301-534, -301-732.

**Analysis:**

The application seeks to construct a temporary haul road extending from Highway 122 into Slurry Pond Cell 5A. The road is depicted on Plate 5-2X. The purpose of the road is to allow trucks and equipment to enter the pond for the purpose of extracting the coal fines for sale and shipment.

The road will be constructed along the edge of the pond 5 reclaimed area within the existing disturbed area which currently contains coal refuse with no topsoil, so no topsoil will need to be recovered. Photos of the disturbed area have been included in this section showing the disturbed area in relation to the reclaimed area. The operator will place markers along the edge of the reclaimed area to insure that no disturbance occurs. Since the entire road will be contained

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within the disturbed area draining into Slurry Pond 5A, sediment control will be obtained using the existing runoff and treatment control facilities, including total runoff containment within the Slurry Cell 5A. The road will be sloped as shown in Figure V-17A so as to allow runoff to flow downhill into Ditch DD1, providing total containment and treatment of runoff from the road. Due to the relatively level grade, the road will be constructed along existing contours and no cut and fill will be required. Construction will consist of using a dozer blade to remove the existing sagebrush and rabbit brush and smooth and level the road to allow truck traffic to travel on it. Road will be maintained to adequately handle the truck traffic. Gravel will be placed on the surface in areas where the in situ soil does not provide an adequate surface for the road.

Exhibit 8-1A was modified to show more details of the encroachment area at the intersection of Highway 122 and Pond 5A Access Road. In Exhibit 8-1A, the road no longer appears to cross a Phase I Bond Release boundary, and is appropriately located. However, the position of the road is not the same in Exhibits VII-18A, and V-9A as it is in Exhibit 8-1A.

**Findings:**

Contents and information provided are sufficient enough to meet the minimum requirements of this section of the Utah Coal Mining Rules. The following deficiency was identified:

**MAPS, PLANS, AND CROSS SECTIONS OF MINING OPERATIONS**

Regulatory Reference: 30 CFR Sec. 784.23; R645-301-512, -301-521, -301-542, -301-632, -301-731, -302-323.

**Analysis:**

The application included updated versions of Exhibit V-9, Exhibit V-9A, Exhibit VII-18A, and Exhibit 8-1A. All plates were submitted electronically. All plates were stamped by a licensed professional engineer. A commitment was made to provide as-built drawings of Pond 5A after mining activities have been completed.

Certified cross sections and profiles for the access road were provided as the Pond 5A Access Road Design on page V-17-4 of Appendix V-17.

**Findings:**

Contents and information provided are sufficient enough to meet the minimum requirements of this section of the Utah Coal Mining Rules.

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## RECLAMATION PLAN

### ROAD SYSTEMS AND OTHER TRANSPORTATION FACILITIES

Regulatory Reference: 30 CFR Sec. 701.5, 784.24, 817.150, 817.151; R645-100-200, -301-513, -301-521, -301-527, -301-534, -301-537, -301-732.

#### Analysis:

Information on the reclamation of the road Appendix V-17 was included with the permit application.

When the road is no longer needed, the surface will be ripped and scarred to allow contemporaneous reseeding. Contemporaneous seeding will be completed in accordance with Section R645-301-331. Upon final reclamation, the road will be reclaimed in conjunction with the existing reclamation plan contained in R645-301-500. Since no contours are being changed as a result of the construction of the road, the existing bond calculations already account for reclamation of the road area.

#### Findings:

Contents and information provided are sufficient enough to meet the minimum requirements of this section of the Utah Coal Mining Rules.

### BONDING AND INSURANCE REQUIREMENTS

Regulatory Reference: 30 CFR Sec. 800; R645-301-800, et seq.

#### Analysis:

There is no bonding analysis with this amendment, nor will there be the necessity to adjust the bond for this permit application. Since no contours are being changed as a result of the construction of the road, the existing bond calculations already account for reclamation of the road area.

#### Findings:

Contents and information provided are sufficient enough to meet the minimum requirements of this section of the Utah Coal Mining Rules.

**RECOMMENDATIONS:**

Conditional approval is recommended at this time.

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