



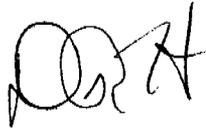
State of Utah
 DEPARTMENT OF NATURAL RESOURCES
 DIVISION OF OIL, GAS AND MINING

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October 16, 1997

TO: File

THRU: Daron Haddock, Permit Supervisor 

FROM: Wayne H. Western, Senior Reclamation Specialist *WHW*

RE: Refuse Basin Mining and Wash Plant Operation, Nevada Electric Investment Company, Wellington Preparation Plant, ACT/007/012-97G, File #2, Carbon County, Utah

Summary:

Proposed changes to the Wellington Preparation Plant were submitted to the Division on September 10, 1997 as amendment 97H. That amendment described how the Permittee will operate the wash plant and mine coal fines.

The information in the amendment was not considered adequate. The Permittee should make the requested changes that are described in this memo and then resubmit the amendment to the Division.

Technical Analysis:

OPERATION PLAN

MINING OPERATIONS AND FACILITIES

Regulatory Reference: 30 CFR Sec. 784.2, 784.11; R645-301-231, -301-526, -301-528.

General

Analysis:

The Permittee submitted amendment 97G to the Division which dealt with the construction of the wash plant and construction of a berm in the upper refuse basin. Before

the Division approved 97G the Permittee submitted 97H. The Division found several deficiencies in 97G and the Permittee modified 97G but did not make and submit the changes that effected information contained in 97H. The Division's staff has difficulty reviewing 97H because some of the information in that amendment conflicts with the information approved under 97G. For clarity the Permittee needs to submit an update version of 97H that contains the changes approved by 97G.

Findings:

The Permittee failed to meet the requirements of R645-301-121.200 by not incorporating the changes approved in amendment 97G into the information submitted in 97H.

Type and Method of Mining Operations

Analysis:

In Section 5.23 of Amendment 97H the Permittee states:

This mining plan facilitates the removal of existing raw coal fines from the Refuse Basin for washing at a new coal preparation plant located on the site. The mining plan requires the completion of a pre-mining construction and plant commissioning phase and a dredge operations mining phases. (See Figure 5.23-1, Mining Sequence for Dredging Operations.)

The pre-mining construction phase includes removal fines in the Northwest tailings area with dry wheeled or tracked vehicles to, upgrade the existing Northwest dike and drains pipe, excavation of a dredge startup pit in the Upper Refuse Basin and in the Lower Refuse Basin.

The Dredge Mining phase of the mining plan employs a suction dredge that removes fines from the Refuse Basin and supplies a slurry feed to the wash plant. During the first year the Permittee hopes to recover 100% of the fines from the Upper Refuse Basin. During the second and third years the Permittee hopes to recover all the fines in the Lower Refuse Basin.

The main reason the Permittee wants to use a dredge is that the coal fines are saturated. Heavy equipment will easily become stuck in the saturated fines, thus surface equipment is not a practical option. One of the few options available to the Permittee is to dredge the coal fines.

Findings:

The Permittee has met the minimum regulatory requirements of this section.

Facilities and Structures

Analysis:

The facilities for the coal fines recovery operations were addressed and approved in Amendment 97G. The operation plan does not require the addition of any new facilities or structures.

Findings:

The Permittee has met the minimum regulatory requirements of this section.

COAL RECOVERY

Regulatory Reference: 30 CFR Sec. 817.59; R645-301-522.

Analysis:

Under R645-301-522 the Permittee is required to describe the measures that will be used to maximize the use and conservation of coal resources. The Permittee did not address how maximum coal recovery will be achieved.

The Division realizes that under the approved reclamation plan the fines will be buried. Therefore, the Permittee's coal recovery plan will recover a resource that would otherwise be lost. However, the Division does need to know that the mine plan will maximize coal recovery. Once this operation has been cessess, the changes of any additional coal fines recovery is are negligible.

Findings:

The Permittee did not meet the requirements of R645-301-522 by failing to provide the Division with a coal recovery 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:

Other Transportation Facilities

No new roads or other transportation facilities will be constructed as part of the mining operation. The support facilities for the coal fines recovery operations which included a conveyor system were approved under amendment 97G.

Findings:

The Permittee has met the minimum regulatory requirements of this section.

SPOIL AND WASTE MATERIALS

Regulatory Reference: 30 CFR Sec. 701.5, 784.19, 784.25, 817.71, 817.72, 817.73, 817.74, 817.81, 817.83, 817.84, 817.87, 817.89; R645-100-200, -301-210, -301-211, -301-212, -301-412, -301-512, -301-513, -301-514, -301-521, -301-526, -301-528, -301-535, -301-536, -301-542, -301-553, -301-745, -301-746, -301-747.

Analysis:

Disposal of noncoal waste.

Coal mine waste.

In Section 5.28 of the MRP the Permittee states:

Refuse from the upper and lower refuse ponds will be mined by dredging and hydraulically transported to the modular coal fines washing plant where the clean coal product will be recovered. Recovered coal will be transported by conveyor to a radial stacker which will stockpile the coal. Coal will be loaded by front-end loader, from the stockpile into trucks for transport from the site. The layout of the fine coal handling operation is shown on Dwg. T1-9597. Tailings from the wash plant will be hydraulically transported to the Northwest pond located in the northwest corner of the upper refuse pond.

The Permittee will dispose of the tailings from the wash plant in the upper and lower refuse basin. The tailings will remain in the refuse basins until reclamation. During final reclamation the basins will be drained and the tailings covered and graded. In amendment 97G the Permittee submitted information that showed the upper and lower basins would safely handle the placement of the tailings from the wash plant.

Findings:

The Permittee has met the minimum regulatory requirements of this section.

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:

Affected area maps.

Mining facilities maps.

Mine workings maps.

Monitoring and sample location maps.

Map E9-3341 and Figure 5.23-1 were not certified as required by R645-301-512. Map E9-3341 does not show the contour elevations are required under R645-301-521.150.

Findings:

The Permittee failed to meet the requirements of R645-301-512 by failing to provide the Division with certified copies of Map E9-3341 and Figure 5.23-1.

The Permittee failed to meet the requirements of R645-301-521.150 by not showing the contour elevations on Map E9-3341.

Recommendations:

Page 6
ACT/007/012-97G
October 16, 1997

Prior to approval the Permittee must correct the above-mentioned deficiencies.

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CC: Paul Baker
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