

TECHNICAL MEMORANDUM
Utah Coal Regulatory Program

December 9, 2010

TO: Internal File

THRU: Jim Smith, Permit Supervisor *DS 13 Dec 2010*

FROM: Priscilla Burton, Environmental Scientist III, Soils. *PWB km 805*

RE: Lila Ventilation Breakouts, UtahAmerican Energy Inc., Horse Canyon Mine, C/007/0013, Task #3705

SUMMARY:

The November 9, 2010 amendment to the MRP describes placing the fan in the #0 portal and constructing five ventilation breakouts: two to the northwest, and three to the south east of the original location, all at an elevation of 6375 ft. The break out locations can be described as narrow benches on an overall slope of 75% or 1.25h : 1v. Mine waste will be disposed of inside the mine. The Division is authorized to grant this exception to topsoil removal under adverse conditions due to slope (R645-301-232.710).

Revised page 59 of Appendix 7-4 indicates that the ventilation breakouts will have a silt fence located along the disturbed area boundary to treat run-off from the slope. The silt fence will also hold topsoil in place for final reclamation. In addition, page 59 states that the Division and the Permittee will evaluate whether "subsequent erosion [control] techniques" (such as seeding) may be beneficial.

The application is recommended for approval.

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SOILS RESOURCE INFORMATION

Regulatory Reference: 30 CFR 783.21; 30 CFR 817.22; 30 CFR 817.200(c); 30 CFR 823; R645-301-220; R645-301-411.

Analysis:

The November 9, 2010 amendment to the MRP describes placing the fan in the #0 portal and constructing five ventilation breakouts: two to the northwest, and three to the south east of the original location, all at an elevation of 6375 ft. The break out locations can be described as narrow benches on an overall slope of 75% or 1.25h : 1v.

Soil Identification and Description, and Productivity

Daniel Larsen, a Professional Soil Scientist with Environmental Industrial Services (E.I.S.) conducted an Order I soil survey of the disturbed area in August of 1998. Sample sites LC 11 and LC 12 that were taken from a bench location at the same elevation above the facilities pad. Sample sites are shown on Plate 2-3. The new locations of the ventilation portals are similarly situated, shown on Plate 5-2.

Appendix E of Appendix 2-3 includes photographs of soil sampling sites LC11 and LC12. The escarpment is mapped as RBT, Rockland-Travessilla Complex. Sample sites LC 11 and LC12 have 5- 6 inches of topsoil and an overall depth of 16 – 28 inches over a sandstone rock layer. (App. D of Appendix 2-3). The soils are suitable for salvage if they were accessible (Appendix C of Appendix 2-3).

Findings:

The information provided meets the environmental soils resource information requirements of the R645- Coal Rules.

OPERATION PLAN

TOPSOIL AND SUBSOIL

Regulatory Reference: 30 CFR Sec. 817.22; R645-301-230.

Analysis:

This ventilation breakouts amendment (Task 669) revises pages 3, 10, 15, & 16 of Chapter 2.

Soils will be removed from all disturbed areas including stony areas to a depth of eighteen inches or to shale (Sections 232.100 and 232.300) with the following exceptions (Section 232.700):

- The RBL and RBT soils on steep rocky slopes within the disturbed area below and between the conveyor and coal storage pile (approximate acreage requested).
- The two bents to be constructed for the conveyor.
- The area of topsoil storage (topsoil will be removed from the access road to and around the topsoil pile, but not from beneath the topsoil pile (Section 232.100).

Information provided on revised pages 10, 15 and 16 has deleted reference to use of equipment to form topsoil berms and states that no topsoil will be salvaged. The Division is authorized to grant this exception to topsoil removal under adverse conditions due to slope (R645-301-232.710).

Revised page 59 of Appendix 7-4 indicates that the ventilation breakouts will have a silt fence located along the disturbed area boundary to treat run off from the slope. The silt fence will hold topsoil in place for final reclamation. In addition, page 59 states that the Division and the Permittee will evaluate whether "subsequent erosion [control] techniques" (such as seeding) may be beneficial.

Findings:

The information provided meets the requirements of the Utah Coal Mining Rules.

RECLAMATION PLAN

STABILIZATION OF SURFACE AREAS

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Analysis:

The ventilation portals will be reclaimed in accordance with the design shown in Appendix 5-6 using spoil stored on site. The surface disturbance will be seeded at final reclamation (App 7-4 Sec. 5.1).

Findings:

Information provided meets the requirements of the Regulations with regard to stabilization of the soil surface.

RECOMMENDATIONS:

The application is recommended for approval.