



State of Utah

DEPARTMENT OF NATURAL RESOURCES

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Division of Oil, Gas and Mining

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February 16, 2016

Karin Madsen, Resident Agent
UtahAmerican Energy, Inc.
P.O. Box 910
East Carbon, Utah 84520-0910

Subject: Drainage Revisions, UtahAmerican Energy, Inc., Horse Canyon Mine,
C/007/0013, Task ID #5056

Dear Ms. Madsen:

The Division has reviewed your application. The Division has identified deficiencies that must be addressed before final approval can be granted. The deficiencies are listed as an attachment to this letter.

The deficiencies authors are identified so that your staff can communicate directly with that individual should questions arise. The plans as submitted are denied. Please resubmit the entire application.

If you have any questions, please call me at (801) 538-5325.

Sincerely,

Daron R. Haddock
Coal Program Manager

DRH/sqs
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Technical Analysis and Findings
Utah Coal Regulatory Program

PID: C0070013
TaskID: 5056
Mine Name: HORSE CANYON MINE
Title: DRAINAGE REVISIONS

Operation Plan

Mining Operations and Facilities

Deficiencies Details:

R645-301-512.120, R645-301-532, R645-301-533.200, R645-301-542.800, R645-301-553, and R645-301-830.140: The Permittee must provide updated narrative and/or tables within Chapter 5 and Earthwork grading bonding sheets that detail the changes in volumes of grading detailed on Plate 7-5.

R645-301-512.200, R645-301-521.180-.190, R645-301-532: The Permittee must provide correct culvert and ditch lengths throughout the MRP (Chapter 5, Appendix 7-4, and Plates 7-5, 5-2.

cparker

Relocation or Use of Public Roads

Deficiencies Details:

R645-301-521.133, R645-103-224.422, R645-301-527, R645-301-534: The Permittee will clarify the ownership and primary use of the roadway adjacent to the Disturbed area.

R645-301-527, R645-301-552: The Permittee will clarify the reclamation or final retention of the newly graded segment of the roadway at final reclamation within Chapter 5 and/or Appendix 5-4 narrative.

cparker

Topsoil and Subsoil

Deficiencies Details:

Deficiencies: R645-301-121.100 and R645-301-231.400, (1) The application must provide a topsoil salvage report for soil salvage activity conducted in 2015. (2) The application must update the Actual Salvaged Topsoil column of the Available Soil Resources Table of Section 232.100 of the MRP and the topsoil volume calculations in Figure 1 of the MRP for soil salvaged in 2014 and 2015. (3) The application must revise the narrative in Chapter 2 to reflect the current status of undisturbed soil within the disturbed area and provide the final configuration of the topsoil stockpile. (3) The application must state the location of topsoil placement in 2015 on the topsoil stockpile (NW, SW, NE or SE) and indicate surface roughening treatment and date of seeding and refer to the seed mix used. If seed mix differed from that described in Chapter 2 of the MRP, describe the seed mix.

R645-301-121.200, (1) Plate 7-5b should show the locations of flow entering the pond either by culvert or ditch. (2) If topsoil remains in the path of culverts to be installed, the application must call out topsoil salvage, storage and protection.

pburton

Road Systems Classification

Deficiencies Details:

R645-301-521.133, R645-103-224.422, R645-301-527, R645-301-534: The Permittee will clarify the ownership and primary use of the roadway adjacent to the Disturbed area.

R645-301-527, R645-301-552: The Permittee will clarify the reclamation or final retention of the newly graded segment of the roadway at final reclamation within Chapter 5 and/or Appendix 5-4 narrative.

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Hydrologic Sediment Control Measures

Deficiencies Details:

The amendment does not meet the State of Utah R645 requirements for Hydrology: Sediment Control Measures. the following deficiencies must be addressed prior to final approval.

R645-301-732 The added note on page 42 of Appendix 7-4 must be removed. The design and operations of all aspects of the sediment pond should be clear at each phase of operations.

R645-301-732 There are numerous inconsistencies between Appendix 7-4, chapter 5 specifications, and what was put in the revised plates. These must be revised and corrected. For example, DC-6 is listed as 30 feet long and 1.5 feet in diameter in Table 9. In the revised chapter 5 text, DC-6 is listed as 107 feet long and 2 feet in diameter. To further add to problems, there is a note at the bottom of Table 9 stating that this culvert was replaced by culverts 20, 21 and 22. However, this culvert is still shown in the submitted plates. There are similar issues with Table 6 notes about ditches that no longer exist, but are still shown on plates. All of the hydrology information should be reviewed before resubmitting information to ensure that it is consistent throughout the MRP, as these examples are just some of the problems encountered.

adaniels

Hydrologic Ponds Impoundments Banks Dams

Deficiencies Details:

The amendment does not meet the State of Utah R645 requirements for Hydrologic: Ponds. The following deficiency must be addressed prior to final approval:

R645-301-742.220 The Division is unable to review the design of the sediment ponds until inconsistencies between Appendix 7-4 and the submitted plates have been corrected. Table 11a thru 13b of Appendix 7-4 are inconsistent with the design shown of ponds in Plates 7-5, 7-6a, and 7-6b. For example, Table 12a states that the bottom of sediment pond 1 is at elevation 5829, but plate 7-6a state that the bottom of the pond is at elevation 5839. The Permittee must review and correct all sediment pond discrepancies before resubmitting the amendment.

adaniels

Maps Affected Area

Deficiencies Details:

R645-301-521.140: The Permittee must correct all plates to show the approved disturbance area and permit area.

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Maps Facilities

Deficiencies Details:

R645-301-512.200, R645-301-521.180-.190, R645-301-532: The Permittee must provide correct culvert and ditch lengths throughout the MRP (Chapter 5, Appendix 7-4, and Plates 7-5, 5-2.

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Reclamation Plan

Backfill and Grading General

Deficiencies Details:

R645-301-512.120, R645-301-532, R645-301-533.200, R645-301-542.800, R645-301-553, and R645-301-830.140: The Permittee must provide updated narrative and/or tables within Chapter 5 and Earthwork grading bonding sheets that detail the changes in volumes of grading detailed on Plate 7-5.

cparker

Road System Retention

Deficiencies Details:

R645-301-534: The Permittee will clarify the ownership and primary use of the roadway adjacent to the Disturbed area.

R645-301-552: The Permittee will clarify the reclamation or final retention of the newly graded segment of the roadway at final reclamation within Chapter 5 narrative.

cparker

Maps Bonded Area

Deficiencies Details:

R645-301-521.100, R645-301-800: The Permittee must correct Plate 7-5 to show all grading within the disturbed boundary area.

R645-301-542.800, R645-301-830.140: The Permittee must provide detailed grading volumes for the new reclamation requirements for all ditches and pond 1 shown on Plate 7-5.

cparker

Bonding and Insurance General

Deficiencies Details:

R645-301-121.200, R645-301-542.800, R645-301-553, R645-301-843.140: The Permittee shall correct all tables within Chapter 5, Appendix 7-4, Bond sheets and all relevant plates to match.

R645-301-121.200, R645-301-542.800, R645-301-553, R645-301-843.140: The Permittee shall update the additional grading required on the earthwork bond sheets.

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Bonding Determination of Amount

Deficiencies Details:

R645-301-121.200, R645-301-542.800, R645-301-553, R645-301-843.140: The Permittee shall correct all tables within Chapter 5, Appendix 7-4, Bond sheets, and all relevant plates to match.

R645-301-121.200, R645-301-542.800, R645-301-553, R645-301-843.140: The Permittee shall update the additional grading required on the earthwork bond sheets

R645-301-121.200, R645-301-542.800, R645-301-553, R645-301-843.140: The Permittee will update the earthwork and revege sheets to the same year dollars as the demolition and change the escalate years from 5 to 2 to get 2018 dollars.

cparker