



Suzanne Steab <suzannesteab@utah.gov>

2018 Annual Report Review Completion

Suzanne Steab <suzannesteab@utah.gov>
To: "Madsen, Karin" <kmadsen@coalsource.com>
Cc: Justin Eatchel <jeatchel@utah.gov>

Tue, Jun 25, 2019 at 3:06 PM

Hello Karin,

The Division staff have completed the review of the 2018 Annual Report for the Horse Canyon Mine. Attached is a copy of the review with comments.

No hard copy will follow.

Thank you for your diligence in completing the Annual Report.

--

Suzanne Steab, Engineering Technician II
Division of Oil, Gas & Mining
1594 West North Temple, Suite 1210
Salt Lake City, Utah 84114-5801
(801) 538-5265

 **Horse Canyon.pdf**
46K

2018 ANNUAL REPORT

Submit the completed document and any additional information identified to the Division by March 31, 2019.

GENERAL INFORMATION

Company Name	UtahAmerican Energy	Mine Name	Horse Canyon Mine
Permit Number	C/007/0013	Permit Expiration Date	2021-05-06
Operator Name	UtahAmerican Energy, Inc.	Phone Number	+1 (435) 888-4000
Mailing Address	PO Box 910	Email	kmadsen@coalsource.com
City	East Carbon		
State	Utah	Zip Code	84520

DOGM File Location or Annual Report Location

Excess Spoil Piles	<input type="checkbox"/> Required <input checked="" type="checkbox"/> Not Required	Not Required
Refuse Piles	<input type="checkbox"/> Required <input checked="" type="checkbox"/> Not Required	Not Required
Impoundments	<input checked="" type="checkbox"/> Required <input type="checkbox"/> Not Required	Annual pond certifications included for bonds 1 and 2
Other:		

OPERATOR COMMENTS

REVIEWER COMMENTS

Met Requirements Did Not Meet Requirements

COMMITMENTS AND CONDITIONS

The Permittee is responsible for ensuring annual technical commitments in the Mining and Reclamation Plan and conditions accepted with the permit are completed throughout the year. The Division has identified these commitments below and has provided space for you to report what you have done during the past year for each commitment. If additional written response is required, it should be filed as an attachment to this report.

Title: RAPTOR SURVEY & PROTECTION

Objective: Identify and monitor all raptors and nests. For possible subsidence impacts to raptor nests, develop a mitigation plan that must be submitted and approved. Apply for 'take permit' through USFWS 2 years prior to subsidence of the nests. Maintain escarpment barrier of at least 200' to prevent cliff habitat loss. **The text of Chapter 3, pg. 13, sect 332 (1) needs to be revised or clarified to demonstrate how the 200' barrier will be measured**

Frequency: Annually

Status: Ongoing since 2005. The map must clearly show raptor nests in relation to mining and subsidence.

Reports: Annual Reports

Citation: MRP, Part B, Section 322.220, page 10, Section 330, page 20, Section 358.100 page 38, Sec. 332 P.13.

OPERATOR COMMENTS

The 2018 raptor surveys were completed by EIS and the report is included in the Confidential Folder. The required text change to Chapter 3 as requested above was made during the 2017 annual report and approved 1-25-18.

REVIEWER COMMENTS



Met Requirements



Did Not Meet Requirements

The 2018 Lila lease raptor survey was conducted on March 20, 29, and 30. No new nests were observed during the survey. Two nests were determined to be active: #455 was active and a pair of golden eagles was sighted in the area, and #714 is believed to be an active falcon nest. Four golden eagle nests were found to be inactive and two eagle nests (717 and 1281) could not be located. One falcon (1280) and one ferruginous hawk (1932) nest could not be located. Twelve raven nests were observed, two of which (948 and 949) were active. TM

Title: COLORADO RIVER ENDANGERED FISH RECOVERY PROGRAM

Objective: Report water depletion for the CO River Endangered Fish Recovery Program

Frequency: Annually

Status: Ongoing

Reports: Annual

Citation: MRP, Section 322.220, page 11

OPERATOR COMMENTS

The Water Depletion Calculations for the Colorado River Endangered Fish Recovery Program is included.

REVIEWER COMMENTS



Met Requirements



Did Not Meet Requirements

The total consumptive use for 2018 was 47.76 acre-feet of water. This information will be submitted to the U.S. FWS.

Title: VEGETATION MONITORING

Objective: Submit color infrared photography. Submit and implement a mitigation plan, if results indicate impact from mining operations.

Frequency: Prior to any mining, and every 5 years after.

Status: Ongoing

Reports: Annual Report

Citation: MRP, Part B, Section 332, page 14

OPERATOR COMMENTS

Not required in 2018, however updated comparisons and a report done by Mt. Nevy Scientific were compiled from the 2016 survey and are included in this report.

REVIEWER COMMENTS

Met Requirements



Did Not Meet Requirements

A report titled "A Comparison of the Plant Communities Using Color Infrared Aerial Photographs for the Lila Canyon Mine 2011 & 2016" is included in the annual report. This report compares color infrared aerial photography from 2011 to 2016 and determines that the data "suggested no discernible differences in the plant communities for the permit area at the Lila Canyon Mine." The next round of imaging will be done in 2021. TM

Title: MAINTAIN RECORDS OF SOIL SALVAGE

Objective: Records of soil salvage will be maintained and included in the annual report. A soil specialist will oversee the soil removal. Soil pedestals will be left to verify soil removal depths.

Frequency: During phase 1 and 2 construction, the soils specialist will record topsoil salvaged and placed in the topsoil stockpile and number of acres salvaged.

Status: Ongoing, Topsoil salvage will resume in 2012.

Reports: Provide an update to the number of acres salvaged and volumes salvaged in the Annual report "Topsoil Movement and Construction Record" and include a map of salvaged and undisturbed acreage.

Citation: R645-301-232.500 and R645-301-232.100 and N10045 abatement.

OPERATOR COMMENTS

Topsoil reports were completed by EIS, are included in this report.

REVIEWER COMMENTS

Met Requirements



Did Not Meet Requirements

3/19/2019, PB. South of the substation, 5,434 CY topsoil was salvaged from 1.44 acres for construction of a storage yard. The volume is based on Scamp Excavation's count of 247 truck loads. Topsoil varied from 8 – 30 inches and averaged 20 inches deep. Boulders were stockpiled. EIS Consultants recommend a survey of the topsoil pile to confirm the reported 71,180 CY in the stockpile. A revised topsoil map in Appendix 1 shows the 2018 salvage and estimates the volume to be salvaged from the remaining 1.09 acres of undisturbed ground: UDA-1 and UDA-2.

Title: SUBSOIL USED FOR CONSTRUCTION FILL

Objective: To record location of subsoil placement for use in reclamation. The location of subsoil with suitable reclamation characteristics will be mapped for ease of recovery and replacement during reclamation.

Frequency: During construction

Status: Ongoing

Reports: Annual report, Submit As built maps showing where subsoil materials have been used as fill material.

Citation: MRP, Section 232.500, Section 241, and Section 242.100

OPERATOR COMMENTS

The subsoil location will be tracked when it is relocated, and the project is complete.

REVIEWER COMMENTS

Met Requirements

Did Not Meet Requirements

Title: MEXICAN SPOTTED OWL

Objective: Conduct two-year calling survey at least two years but no more than four years prior to undermining identified habitat. Results will be submitted to USFWS, DWR, and the Division immediately following each nighttime survey. If owls are observed, the agencies will immediately coordinate to determine appropriate measures.

Frequency: Dependent on habitat and mine plan

Status: Please keep confidential map 5-3 updated with correct mine workings to indicate when mining will occur under MSO habitat.

Reports: Submit final reports in annual report.

Citation: MRP, Part B, Section 333, page 17

OPERATOR COMMENTS

MSO survey report two-year calling surveys were completed in 2013 and 2014 and were not required in 2018.

REVIEWER COMMENTS

Met Requirements

Did Not Meet Requirements

Mexican spotted owl calling surveys must be completed at least two years prior, but not more than four years prior, to the undermining of identified habitat. TM

Title: REACTIVATION OF OPERATIONAL MONITORING OF SURFACE WATER SAMPLING LOCATIONS

Objective: Quarterly sampling to initiate at least two years prior to resuming underground mining activities on sites L-6-G, L-7-G, L-8-G, L-9-G, L-10-G, L-11-G, L-12-G, L-13-S, L-14-S, L-15-S, L-18-S, L-19-S, L-20-S, IPA-1, IPA-2, IPA-3

Frequency: Notify Division once, quarterly sampling

Status: Monitoring suspended as of October 2011, Division awaiting reactivation notification.

Reports: Annual Report, notify Division if/when mining is to occur.

Citation: MRP, Part B, Section 731.222, table 7-3

OPERATOR COMMENTS

Quarterly sampling of locations: L-7-G, L-8-G, L-9-G, L-11-G, L-12-G, L-19-S, IPA 1, IPA 2, and IPA 3 have resumed, and an updated Monitoring Location table was incorporated into the MRP and approved as of May 28, 2015. L-6-G, L-10-G, L-13-S, L-14-S, L-15-S, and L-20-S were permanently suspended in 2003. See MRP Table 7-3 for further information. IPA #3 was sealed in October of 2017, and an MRP correction was approved at that time.

REVIEWER COMMENTS

Met Requirements



Did Not Meet Requirements

The Annual Report meets the State of Utah R645 requirements for Hydrology.

The Division is aware of the active and inactive surface and groundwater monitoring sites for the mine. The Permittee continues to submit water monitoring data on a quarterly basis as specified in the MRP. (KS, 5/30/2019)

Title: GENEVA MINE/ LILA CANYON FAN PORTAL BARRICADES

Objective: Inspect the Geneva Mine fan portal Barricades annually and report findings to Division and BLM.

Frequency: Annually

Status: Ongoing

Reports: Annual Report.

Citation: MRP, Part B, Chapter 5, Section 529, page 54 and 55

OPERATOR COMMENTS

The inspection was done by EIS and is included.

REVIEWER COMMENTS

Met Requirements



Did Not Meet Requirements

The Lila Canyon fan portals were inspected by Molly Hocanson from EIS Environmental & Engineering Consulting on March 30, 2018. The results of that inspection revealed no signs of vandalism had occurred to either of the two breakouts. The posted signs warning of possible dangerous atmospheric conditions remain in place. The rock slide that had closed the southern portal in 2015 remains in place with no signs of tampering or damage. Photographs were submitted and all chain link rock barricades appear intact. JE

FUTURE COMMITMENTS AND CONDITIONS

The following commitments are not required for the current annual report year, but will be required by the permittee in the future as indicated by the "status" field. These commitments are included for information only, and do not currently require action. If you feel that the commitment is no longer relevant or needs to be revised, please contact the Division.

Title: WILDLIFE

Objective: Adhere to wildlife exclusionary periods: raptors (Feb 1 - July 1), bighorn sheep lambing, (May 1 - June 15), and pronghorn (May 15 - June 20).

Frequency: Prior to construction of any new facility projects, structures, and roads; and prior to reclamation.

Citation: MRP, Part B, Sec. 330, p. 20.

Title: LILA CANYON MINE SALVAGE OF CRYPTOGRAMS ON TOPSOIL PILE PRIOR TO RECLAMATION.

Objective: Salvaged cryptograms will be added to the wood fiber mulch and hydrosprayed on the surface of the reclaimed site.

Frequency: Immediately after seeding of the reclaimed site.

Status: During reclamation of the Lila Canyon Mine.

Reports: Success of cryptogamic establishment will be evaluated (by Division and Permittee) prior to collection from topsoil stockpile.

Citation: MRP, Part B, Section 232.100, and Section 234.230

Title: VEGETATION MONITORING

Objective: Submit color infrared photography. Submit and implement a mitigation plan, if results indicate impact from mining operations.

Frequency: Prior to any mining, and every 5 years after.

Status: Ongoing. Baseline submitted in 2011. Next round of photos are due in 2016. A comparison between 2016 and 2011 photos will be required in 2016.

Reports: Annual Report

Citation: MRP, Part B, Section 332, page 14

REPORTING OF OTHER TECHNICAL DATA

Please list other technical data or information that was not included in the form above, but is required under the approved plan, which must be periodically submitted to the Division.

Please list attachments:

Annual opacity survey was completed by Barr Engineering and the results are included.
Annual Rainfall report was completed by HydroPlot Engineering, and the results are included.

REVIEWER COMMENTS

Met Requirements

Did Not Meet Requirements

The Annual Report meets the State of Utah R645 requirements for Hydrology. The Annual Report includes rain gauge data from late 2017 through 2018 at the mine and above the mine on top of the Book Cliffs. These data were collected with tipping bucket rain gauges. The total precipitation at the mine for 2018 was 8.12". In the first half of 2018 the gauge on top of the Book Cliffs recorded 3.01". This gauge was inaccessible for the second half of 2018 and the Permittee will report these data in the 2019 annual report. (KS, 5/30/2019)

