



Technical Analysis and Findings

Utah Coal Regulatory Program

September 28, 2016

PID: C0070016
TaskID: 5271
Mine Name: GORDON CREEK 2, 7 & 8 MINES
Title: AS-BUILTS

Reclamation Plan

Revegetation General Requirements

Analysis:

The Division staff have reviewed the additional information provided by the permittee and concurred with the finding that the diversions which were damaged were the result of precipitation events that exceeded the design storm regulations. Reclamation of the affected areas will not restart the 10 year liability period. The information is adequate to meet the requirements of this section of the regulations.

jheltric

Bonding and Insurance General

Analysis:

The Division received an amendment to the approved Gordon Creek 2, 7 & 8 MRP on September 7, 2016. This amendment included a discussion on the storms that triggered the damage that led to repair work on various channels at the mine site in 2014 and 2015. Appendix 7-1 was updated to include further discussion on the storms that triggered erosion, especially in channel SD-6. Rich White, a professional engineer with EarthFax Engineering inspected the channels after erosion had taken place in the fall of 2014 and took measurements so and estimate of the storm that caused the erosion could be analyzed.

Through his measurements he was able to extrapolate that the storm causing the erosion sent 137 cfs through channel SD-6. This channel was designed and approved in the MRP to handle a 100 year - 6 hour rainfall event that would result in 7.08 cfs of flow in SD-6.

From the information and calculations performed by EarthFax Engineering, it is the Divisions finding that the storm causing the erosion of channels at the mine site were much larger than the storms used for the design required by the rules.

adaniels

Bonding and Insurance General

Analysis:

The amendment meets the State of Utah R645 requirements for general bonding Requirements.

The amendment did not originally meet the minimum requirements of R645-301-500 and -800 by not presenting a enough

design details in Task 5062 on February 2016 and by not presenting enough storm information to show design storm was exceeded in Task 5189 on June 2016. The current amendment includes enough information for the Division Hydrologist to determine that indeed the storm was beyond the required design storm of the channel, see ADaniels Bonding and insurance findings. The liability period of the bond at this point does not need to be reset.

cparker