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July 6, 1989

TO: Sue Linner, Permit Supervisor

FROM: Randy Harden, Reclamation Engineer

RE: Surface Facilities Expansion, Soldier Creek Coal Company, Soldier Canyon Mine, ACT/007/018, Folder #2, Emery County, Utah

SUMMARY:

This memo is in review of the proposed new surface facilities for the Soldier Canyon Mine submitted on May 22, 1989.

ANALYSIS:

UMC 783.24-25 Maps: General Requirements, Cross Sections, Maps, and Plans - JRH

Disturbed area boundaries should be provided on all of the drawings as required, specifically D-256 and D-264.

Maps and plans presented in the proposal are, in general, sufficient for the review and the approval of the facilities. However, the maps and plans presented in the proposal will have to be revised to reflect the sequence and timing of the reclamation of the new facilities in conjunction with the overall surface operations. This should be resolved in conjunction with the mid-permit term review and will not be subject to approval of these facilities.

UMC 784.18 Relocation or Use of Public Roads - JRH

The operator needs to provide approval of the modifications to the road and right-of-way used in conjunction with the proposed surface facilities. This approval should be made for both the operation and reclamation plans for the facilities in conjunction

with the county road. No permit or other information was found in the proposal or within the existing MRP regarding this. There was a letter contained in the proposed plan indicating a concensus with the culvert installation but the letter does not appear to be final approval for the construction or the reclamation plans within the right-of-way of the county road.

Additionally, conveyors will pass over the existing roadway. These structures as well as any other structure or facility encroaching on the county road should be approved by the county in permitting the construction of these facilities.

UMC 784.19 Underground Development Waste - JRH

The operator has proposed the utilization of spoils and underground development waste produced by the construction of the new surface facilities into those facilities. Currently, analyses and the determination of the suitability of those materials has not been presented by the operator or approved by the Division. The proposed plan and the MRP must present plans for both the temporary and permanent disposal of excess spoils and mine development waste within the permit area in accordance with UMC 817.71.

The operator currently has a waste disposal site incorporated into the MRP but has not met the stipulated requirements to utilize those facilities.

Although much of the waste materials may be utilized in the construction of the new facilities, the operator needs to continue to finalize the design for the waste rock disposal facilities as a means and a location for temporary storage and permanent disposal of excess spoils and mine development waste.

In the event that there are insufficient fill areas for the new facilities an excess of development waste material will be generated. The operator will need to locate and determine a place for both the temporary and the permanent disposal of this material.

UMC 784.24 Transportation Facilities - JRH

The operator has applied for air quality permits in consideration of the new coal handing facilities at the mine. At this time,the Bureau of Air Quality has not provided approval to the operator in conjunction with these new facilities.

UMC 800 - Bonding and Insurance - JRH

Bonding calculations provided by the operator are not considered adequate. The tabled information regarding costs must be referenced to the specific areas and reclamation treatments to be accomplished. A map indicating Phase I and Phase II reclamation should also be provided to indicate those treatments and the order in which these facilities are to be removed and reclaimed.

Stream channel reclamation requirements and costs appear to be deficient in that they do not include the reclamation costs for riprap material for reclamation. Riprap and other costs associated with the reclamation of stream and ephemeral drainages should be incorporated into the reclamation costs.

While these deficiencies exist in the proposal, it is apparent that the recalculation and redetermination of the bond amount should be accomplished in conjunction with the mid-term permit review.

Samples of bonding calculations are provided for the operator's reference.

UMC 817.13 Casing and Sealing of Exposed Underground Openings: General Requirements - JRH

UMC 817.14 Casing and Sealing of Exposed Underground Openings: Temporary - JRH

UMC 817.15 Casing and Sealing of Exposed Underground Openings: Permanent - JRH

No information regarding the requirements of these sections of the regulations was found within the text of the proposal. The operator needs to address these requirements for casing and sealing the new mine openings.

UMC 817.101 Backfilling and Grading: General Requirements - JRH

Mass balance information provided in the plan is inconclusive. No calculations have been provided in the text of the proposal to justify the numbers provided. No references to drawings or cross sections were provided in the text of the proposal.

Mass balance calculations should reference specific maps and plans used for those calculations. The calculations should indicate the cut and fill requirements for each section, section intervals, and volumetric calculations.

Samples of mass balance calculations are attached for the operator's reference.

BT14/7-10