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State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

Norman H. Bangertter
Governor
Dee C. Hansen
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Dianne R. Nielson, Ph.D.
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355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203
801-538-5340

November 19, 1992

Mr. J. T. Paluso, Chief Engineer
Soldier Creek Coal Company
P. O. Box I
Price, Utah 84501

Dear Mr. Paluso:

Re: Approval of Renewal Response for R645-301-200 (Soils), Soldier Creek Coal Company, Soldier Canyon Mine, ACT/007/018-92D, Folder #3, Carbon County, Utah

The Division has completed a review of materials submitted to satisfy Division Order 92A with regard to the soils section. The submittals are considered complete and adequate and are hereby approved. Division Order 92A is considered satisfied with regard to the R645-301-200 Soils section. The remaining sections of the Division Order are still under review and you will be receiving further correspondence regarding their disposition.

Upon going through your submittals, it appears that some information was inadvertently left out. We are missing 4 copies of Figure 3 Drawing D-348 and 3 copies of Figure 3 (Con't) Drawing D-349. Also, only one copy of Map 3.7-2 and Appendix 2B (prime farmland) were supplied to the Division. Soldier Creek must supply an additional 9 copies of Map 3.7-2 and Appendix 2B as well as the other missing copies of Drawing D-348 and D-349. These copies should be supplied by December 18, 1992.

I have enclosed a copy of the technical review of your plans for your information. Thank you for your cooperation during the permitting process. Please call me or Priscilla Burton if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Daron R. Haddock".

Daron R. Haddock
Permit Supervisor

Enclosure

cc: P. Burton
J. Helfrich
S. Falvey
S. Demczak, PFO



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November 17, 1992

TO: Daron Haddock, Permit Supervisor

FROM:  Priscilla Burton, Senior Soils Reclamation Specialist

RE: Final Review. Permit Renewal Division Order 92A, Deficiencies. Responses received 10/26/92 regarding R645-301-200 (Soils). Soldier Creek Coal Co., Soldier Canyon Mine, ACT/007/018-92D, Folder #2, Carbon County, Utah

SUMMARY

Soldier Canyon Coal Co. (SC3) was issued a permit renewal on 1/28/92 for the Soldier Canyon Mine. The renewal included a Division Order to address deficiencies with the Soldier Canyon Mine plan. Responses received 5/8/92 were reviewed 7/23/92 for compliance with the R645-301-200 section of deficiencies. On 10/26/92 further information was received by the Division for compliance with the remaining R645-301-200 deficiencies.

Each outstanding deficiency is re-iterated in italics, followed by a summation of information presented and/or compliance with the stated regulation.

During a March 5, 1992 meeting with SC3 representatives, compliance with Item #4 of R645-301-222 (soil survey) was discussed. The Order 1 soil survey map of the surface facilities area will be prepared and submitted prior to Fan #3 construction.

Map 3.7-2 and Appendix 2B (prime farmland) were referred to within the submittal as having been supplied to the Division on 3/11/92. Only one copy of each map and appendix was received. Ten copies should be received to supplement the amendment package presently stored at the Division and awaiting distribution to other Agencies.

ANALYSIS:

R645-301-222. Soil Survey.

Deficiency #1

Include information in Appendix 10 regarding the Fan #3 exploration soils data gathered by

the SCS. Include the volumes of topsoil stored at the Topsoil Storage site from the Fan #3 exploration.

Compliance:

All information has been received. The Permittee is in compliance.

Deficiency #4

An Order 1 soil survey map of the surface disturbed mine facilities area must be prepared before construction of Fan #3. This map will consolidate the information provided in Appendix 10 (Vol. 5) and Chapter 2, and Fan #3 exploration. Locations of all previous sample pits and auger holes, and dates of sampling will be provided on the map. The map must show all soil types from available information. Areas disturbed prior to August 1977 will be delineated.

Analysis/Compliance:

During a meeting on 3/5/92, D Spillman and T Paluso of SC3 presented their intention to comply with this deficiency when construction on Fan Site #3 occurs, possibly in 1993. The Division accepted this delay in compliance. Item #4 of R645-301-222, Soil Survey, remains deficient. The Applicant must complete this survey information prior to gaining approval of construction on Fan Site #3.

R645-301-222.400. Present and Potential Productivity of Existing Soils.

Deficiency #1

Clarify the number of reference areas and mention on pg. 3-22 and pg. 5 of Appendix. 3-B the figures which show location of vegetation reference areas.

Analysis/Compliance:

The requested information was received. The Permittee is in compliance.

R645-301-224. Substitute Topsoil.

Deficiency #3

Clarify the description of the location of soil sample #2 (pg.2-19 of Vol 1 of the MRP) and the storage location of the soils represented by sample #2 (pg. 2-32 of vol 1 of the MRP).

Analysis/Compliance:

The topsoil referred to is located in an active storage yard which is covered with a gravel cap (Exhibit 5.21-1). This material has been classified as substitute topsoil. The storage of this material and other pad material is not adequate to provide a dynamic biosphere upon reclamation. Due to the fact that the disturbance is pre-SMCRA and there is no other available cover, this material (although it is subject to compaction and contamination from operations) will remain the designated substitute topsoil material. The adverse impacts of the storage conditions of this soil may be mitigated through the incorporation of an organic matter amendment to the substitute medium upon final reclamation as per item #3 of R645-301-234. The Permittee is in compliance.

Deficiency #5

Present a commitment in the MRP to resample all designated substitute topsoil locations prior to final reclamation, refer to the deficiencies under R645-301-234 for specifics.

Analysis/Compliance:

Refer to Deficiency #2 of R645-301-234. The Permittee is in compliance.

R645-301-230. Operation Plan.

Deficiency #1

All topsoil storage locations at the mine site must be specified on Map 5.21-1, Central Mine Facilities Map, estimate total and individual yardage.

Analysis/Compliance:

A total of 10,522 yd³ of cover material can be salvaged from the locations sampled in 1984 and shown on Exhibit 5.21-1. The substitute topsoil is identified on Exhibit 5.21-1 (revised 10/30/92). The Permittee is in compliance.

Deficiency #2

The method of determining volumes of material must be stated, since cross-section of all topsoil piles and substitute topsoil piles which are stored at the topsoil storage site were not

included with the MRP.

Analysis/Compliance:

Cross-sections of the topsoil and subsoil located at the topsoil storage site were provided. Figure 2 of Appendix 2-E shows cross section locations. The Permittee is in compliance.

R645-301-234. Topsoil Storage.

Deficiency #1

Locate all the designated substitute topsoil and all the topsoil storage areas on Central Mine Facilities Map 5.21-1 of the MRP.

Analysis/Compliance:

Revised exhibits 5.21-1 and 3.7-2 show soil sampling locations at the central facilities area. The locations of substitute topsoil and all topsoil storage areas at the central mine facilities are identified on Exhibit 5.21-1 (revised 10/22/92). The Permittee is in compliance.

Deficiency #2

Amend the MRP to state that the pre-SMCRA surface will be covered with the best substitute topsoil material in the permit area as determined by testing of depth segregated samples for total and nitrate nitrogen, phosphorus, potassium, and total petroleum hydrocarbons, SAR, electrical conductivity, pH, percentage rock fragments, organic carbon, boron and selenium at the time of final reclamation.

Analysis/Compliance:

Pages 2-24, 2-24a, and 2-29 discuss a resampling program. Three depth segregated samples will be taken from each storage location. Parameters to be measured are identified and a sampling depth interval of one foot is specified. The Permittee is in compliance.

Deficiency #3

Amend the plan to state that organic matter such as composted manure, digested sewage sludge, composted sawmill waste or other available material will be incorporated into the

substitute topsoil upon reclamation to inject microbial activity into the rhizosphere. Methodology to be used will be based upon the test plots developed at the permanent topsoil storage site, using subsoil excavated from the refuse disposal site.

Analysis/Compliance:

A commitment for the incorporation of organic matter to substitute topsoil upon final reclamation has been included on page 2-24a. The Permittee is in compliance.

R645-301-242. Soil Redistribution.

Deficiency #1

Differentiate between the substitute topsoil and backfill from each location on the reclamation volumes Map 5.42a.

Analysis/Compliance:

There is 10,522 yd³ of fill available for cover material from the parking lot, the upper storage yard, the crib wall, sediment pond and fan #2 (page 2-29). Exhibit 5-21-1 identifies these areas. Exhibit 5.42a (revised 10/31/92) depicts the reclamation topsoil and cut/fill volumes to be derived from the same areas.

Deficiency #3

Describe the method of sampling which will enable determination of unsuitable material which will be placed against the highwall. i.e., frequency of sampling, the depths of sampling, the analyses to be performed, etc. Will the sampling, as described in Deficiency #3 of R645-301-234, be conducted?

Analysis/Compliance:

A sampling plan for the graded fill is presented on page 2-24a. Sampling will include the parameters listed in Table 6 of the Division's "Guidelines for the Management of Topsoil and Overburden..." as well as testing for gas and diesel/oil and grease total petroleum hydrocarbons in the location of the repair shop and fuel storage area. The Permittee is in compliance.

CONCLUSIONS

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ACT/007/018-92D
November 17, 1992

The submittal received on 20/26/92 provides information for compliance with the Rules 645-301-200 *et seq.* Compliance with a single stipulation (Item #4 of R645-301-222 Soil Survey) has been postponed until construction of the Fan #3 project.

Map 3.7-2 and Appendix 2B (prime farmland) were referred to within the submittal as having been supplied to the Division on 3/11/92. Only one copy of each map and appendix was received. Ten copies should be received to supplement the amendment package presently stored at the Division and awaiting distribution to other Agencies.

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