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July 9, 1997

TO: File

THRU: Joe Helfrich, Permit Supervisor

A handwritten signature in black ink, appearing to read 'JH'.

FROM: Robert Davidson, Soils Reclamation Specialist

Handwritten initials 'RAD' in black ink.

RE: Technical Analysis for Coal Exploration Plan of Federal Coal Lease UTU-69635, Canyon Fuel Company, Soldier Canyon Mine, ACT/007/018-97A, Folder #2, Carbon County, Utah

SYNOPSIS

Canyon Fuel Company has submitted a coal exploration plan on federal coal lease UTU-69635. The plan specifies exploration for drilling 4 holes (11-1-97, 11-2-97, 11-3-97 & 14-1-97) on private and fee surfaces and will involve coal resources administered by the U. S. Bureau of Land Management. Exploration will commence in the second week of June 1997. None of the drill holes will be used as surveillance, monitoring or water wells.

COAL EXPLORATION: COMPLIANCE DUTIES

OPERATION STANDARDS

Regulatory Reference: R645-202-230

Analysis:

Roads

Access to drill sites 11-1-97, 11-2-97 and 14-1-97 will require new road construction. Drill site 11-1-97 is located on an existing jeep trail. The following summarizes drill-hole access:

- Topsoil needs to be salvaged and stockpiled where road construction significantly disturbs the soil surface and leveling takes place. The plan states that earth excavated when dressing-up wheel tracks will be placed on the up-hill side of the road. It is assumed that reference is given to "existing" wheel tracks. No mention is given for new road construction.



Topsoil

The exploration plan simply states that earth excavation for the drill sites will involve grubbing of some areas, removal and separate storage of the soil A horizon and, if needed, removal and separate storage of soil below the A horizon to make a level drill site. No other specifics are given relative to topsoil salvage and/or storage. Adequately address topsoil removal and storage for road and pad construction by providing the following:

- Provide topsoil removal criteria outlining salvage practices and methods.
- Provide a soil scientist during construction overseeing soil salvage operations.
- Provide topsoil-stockpile construction procedures and protection measures

Acid and/or Toxic Forming Materials

All drilling muds and cuttings proposed to be buried on site, need to be buried four feet deep. Otherwise, all drilling muds, fluids and cuttings must be analyzed for acid- or toxic-forming characteristics before they are buried. Acid- or toxic-forming materials thus identified must be handled and disposed of properly (R645-202-236).

Findings:

Information provided in the proposed Exploration Permit Application is not considered adequate to meet the requirements of this section. Prior to approval, the permittee must provide the following in accordance with:

R645-202-232: Topsoil needs to be salvaged and stockpiled where road construction significantly disturbs the soil surface and leveling takes place. The plan states that earth excavated when dressing-up wheel tracks will be placed on the up-hill side of the road. It is assumed that reference is given to "existing" wheel tracks. No mention is given for new road construction.

R645-202-233: Adequately address topsoil removal and storage for road and pad construction by providing the following:

- Provide topsoil removal criteria outlining salvage practices and methods.
- Provide a soil scientist during construction overseeing soil salvage operations.
- Provide topsoil-stockpile construction procedures and protection measures.

R645-202-236: The drilling muds, fluids and cuttings must be analyzed for acid- or toxic-forming characteristics before they are buried. All acid- or toxic-forming materials thus identified must be handled and disposed of properly. Otherwise, all drill cuttings must be buried a minimum of four feet.

RECLAMATION STANDARDS

Regulatory Reference: R645-202-240

Analysis:

The reclamation plan states that reclamation will start once the mud pits are dry and will involve replacing the soil horizons in the reverse order in which they were removed, reseeding the areas and redistributing any grubbed material. The following specifics are needed:

- The exploration sites need to have all trash and debris removed and the drill pads returned to approximate original.
- All new roads need to be removed and reclaimed.

Findings:

Information provided in the proposed Exploration Permit Application is not considered adequate to meet the requirements of this section. Prior to approval, the permittee must provide the following:

R645-202-241 and R645-202-232: The exploration sites need to have all trash and debris removed and the drill pads returned to approximate original. All new roads need to be removed and reclaimed.