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State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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February 11, 1998

Rick Olsen, General Manager
Canyon Fuel Company, LLC
P.O. Box 1029
Wellington, Utah 84542

Re: Updated Central Mine Facilities Map, Exhibit 5.21-1 and Updated Runoff Control Map, Exhibit 7.32-1, Canyon Fuel Company, LLC, Soldier Canyon Mine, ACT/007/018-98A, File #2, Carbon County, Utah

Dear Mr. Olsen:

The review of the referenced amendment has depicted two deficiencies in the updated runoff control map. These deficiencies are enumerated in the analysis and findings section of exhibit 7.32-1 of this document.

TECHNICAL ANALYSIS:

MAPS, PLANS, CROSS SECTIONS OF MINING OPERATIONS

Exhibit 5.21-1 Central Mine Facilities Map

Analysis:

A comparison of the currently approved Central Mine Facilities Map, Exhibit 5.21-1, Drawing Number E-029 versus the revised drawing 5.21-1, Drawing Number D424 shows that the old drawing has details for run-of-mine coal handling and a coal processing plant; these have been removed from the revision, cleaning up the drawing significantly. The revision is drawn at a scale of one inch equals 80 feet; the currently approved drawing is at a one inch equals 50 feet scale. The revised drawing does show the location of the REI office and bathhouse trailers. These have been removed from the site, although the concrete pads for same do still exist. There are no other changes or errors on the new revised drawing.

Findings:

It is recommended that the revised Exhibit 5.21-1 Central Mine Facilities Map be approved as submitted.

Exhibit 7.32-1 Runoff Control Map

Analysis:

The 84 inch undisturbed drainage bypass culvert located beneath the number 1 mine fan is now shown on the revised edition. It is not shown on the currently approved map.

All culverts shown on the revised drawing indicate the size of same, with the exception of the REI culvert. This size is not indicated on either the currently approved drawing or the new revision.

In the field, straw bales exist at the end of and on the NE corner of the #2 mine fan diffuser. These are not shown on either the approved or the revised drawing, The bales are shown on Exhibit 5.21-9, Dwg. #E015, ASCA #3.

The revised drawing (new submittal) shows straw bale "dikes" delineating the west boundary of ASCA #5. These same bales are also shown on Figure 7.42-4, page 7-156 which is the detail drawing for ASCA #5. Are these bales intended as a sheet flow treatment prior to entering the channel, or is their purpose that of diverting the sheet flow (this seems correct if one considers the definition of "dike") which they intercept?? If that is the case, where/what is the treatment for this redirected flow?

Similarly, straw bales "define and protect" the south end of the topsoil storage area in ASCA #1, as shown on Figure 7.42-1, page 7-149. Other bales are specifically installed for sediment control/drainage filtration prior to runoff entering the Soldier Creek channel. This treatment is not shown on either the approved or the revised "Runoff Control Map" as submitted.

It is confusing as to why the permittee feels some bales/treatment should be shown on the runoff control maps and others should not be. Although the revised drawing shows consistency with the approved drawing regarding not showing these sediment control structures, there is a problem with the lack of consistency showing these "treatments" on the runoff control map. R645-301-731.720 requires a P.E. certified map showing methods of treatment for these alternative sediment control areas. The revised Exhibit 7.32-1, drawing number D423 is P.E. certified, but does not show the methods of treatment for the ASCA's. The detail drawings of the ASCA's within the MRP show the methods of treatment, but are not P. E. certified.

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The revised drawing does not show the designation WS-15, which is the name of the drainage area surrounding the number 2 mine fan and its associated electrical substation.

Findings:

- 1) Either the methods of treatment for the various ASCA's need to be shown on the P.E. certified "Runoff Control Map", Exhibit 7.32-1, Dwg.# D423, or
- 2) the ASCA detail drawings as shown in the MRP (Figures 7.42-1, Figure 7.42-4, Exhibit 5.21-9) should be P. E. certified.

The revised Exhibit 7.32-1, Drawing #D423 "Runoff Control Map" as received January 15, 1998, does not meet the requirements of R645-301-731.720.

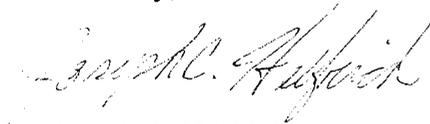
RECOMMENDATION:

It is recommended that the revised Exhibit 5.21-1 Central Mine Facilities Map be approved.

Exhibit 7.32-1 Runoff Control Map does not meet the requirements of the R645 regulations.

Please address these deficiencies by February 23, 1998. If you have any questions, please call Pete Hess or me.

Sincerely,



Joseph C. Helfrich
Permit Supervisor