



The State of Utah

Department of  
Natural Resources

Division of  
Oil, Gas & Mining

ROBERT L. MORGAN  
*Executive Director*

LOWELL P. BRAXTON  
*Division Director*

OLENE S. WALKER  
*Governor*

GAYLE F. McKEACHNIE  
*Lieutenant Governor*

Representatives Present During the Inspection:		
Company	Mike W. Glasson	Environmental Coordinator
OGM	Priscilla Burton	Environmental Scientist III
OGM	Karl Houskeeper	Environmental Scientist III

# Inspection Report

Permit Number:	C0070019
Inspection Type:	PARTIAL
Inspection Date:	Wednesday, August 25, 2004
Start Date/Time:	8/25/2004 9:00:00 AM
End Date/Time:	8/25/2004 12:00:00 PM
Last Inspection:	Tuesday, July 20, 2004

Inspector: Karl Houskeeper, Environmental Scientist III

Weather: Clear, Temp 74 Deg F

InspectionID Report Number: 379

Accepted by: whedberg  
8/31/2004

Permittee: **ANDALEX RESOURCES INC TOWER DIVISION**

Operator: **ANDALEX RESOURCES INC TOWER DIVISION**

Site: **CENTENNIAL MINE**

Address: **PO BOX 902, PRICE UT 84501**

County: **CARBON**

Permit Type: **PERMANENT COAL PROGRAM**

Permit Status: **INACTIVE**

**Current Acreages**

5,419.49	<b>Total Permitted</b>
34.20	<b>Total Disturbed</b>
	<b>Phase I</b>
	<b>Phase II</b>
	<b>Phase III</b>

**Mineral Ownership**

- Federal
- State
- County
- Fee
- Other

**Types of Operations**

- Underground
- Surface
- Loadout
- Processing
- Reprocessing

**Report summary and status for pending enforcement actions, permit conditions, Division Orders, and amendments:**

There are no pending compliance actions. The only permit condition currently in place is that the permittee must submit all water monitoring data in an electronic format to the Division's web site. The permittee is complying with this stipulation.

The Division received an application for an IBC on the Mathis Tract (20.0 acres) and in the Federal Summit Creek Lease Area (72.32 acres). The proposed change is for 92.32 acres or 1.705% of the Centennial Project Permit Area. The application was assigned Task ID #1919. Task ID #1919 was sent deficient on June 18, 2004. The operator responded to the deficiencies on July 2, 2004. The response was assigned Task ID #1979 and is currently under review by the Division.

Priscilla Burton, Division Technical Staff, was present during the partial inspection. See items 3 and 9 for comments.

Photos of topsoil and substitute topsoil stockpiles were taken during the inspection.

Inspector's Signature

*Karl H. Houskeeper*  
Karl Houskeeper, Environmental Scientist III

Inspector ID Number: 49

Date Wednesday, August 25, 2004

**Note:** This inspection report does not constitute an affidavit of compliance with the regulatory program of the Division of Oil, Gas and Mining.

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**Inspection Continuation Sheet**

**REVIEW OF PERMIT, PERFORMANCE STANDARDS PERMIT CONDITION REQUIREMENTS**

1. Substantiate the elements on this inspection by checking the appropriate performance standard.
  - a. For COMPLETE inspections provide narrative justification for any elements not fully inspected unless element is not appropriate to the site, in which case check Not Applicable.
  - b. For PARTIAL inspections check only the elements evaluated.
2. Document any noncompliance situation by reference the NOV issued at the appropriate performance standard listed below.
3. Reference any narratives written in conjunction with this inspection at the appropriate performance standard listed below.
4. Provide a brief status report for all pending enforcement actions, permit conditions, Division Orders, and amendments.

	Evaluated	Not Applicable	Comment	Enforcement
1. Permits, Change, Transfer, Renewal, Sale	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Signs and Markers	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Topsoil	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4.a Hydrologic Balance: Diversions	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.b Hydrologic Balance: Sediment Ponds and Impoundments	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.c Hydrologic Balance: Other Sediment Control Measures	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.d Hydrologic Balance: Water Monitoring	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4.e Hydrologic Balance: Effluent Limitations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Explosives	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. Disposal of Excess Spoil, Fills, Benches	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. Coal Mine Waste, Refuse Piles, Impoundments	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
8. Noncoal Waste	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. Protection of Fish, Wildlife and Related Environmental Issues	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10. Slides and Other Damage	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11. Contemporaneous Reclamation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
12. Backfilling And Grading	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
13. Revegetation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
14. Subsidence Control	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
15. Cessation of Operations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
16.a Roads: Construction, Maintenance, Surfacing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
16.b Roads: Drainage Controls	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
17. Other Transportation Facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
18. Support Facilities, Utility Installations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
19. AVS Check	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
20. Air Quality Permit	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
21. Bonding and Insurance	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
22. Other	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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## Inspection Continuation Sheet

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### **1. Permits, Change, Transfer, Renewal, Sale**

There are no pending compliance actions. The only permit condition currently in place is that the permittee must submit all water monitoring data in an electronic format to the Division's web site. The permittee is complying with this stipulation.

The Division received an application for an IBC on the Mathis Tract (20.0 acres) and in the Federal Summit Creek Lease Area (72.32 acres). The proposed change is for 92.32 acres or 1.705% of the Centennial Project Permit Area. The application was assigned Task ID #1919. Task ID #1919 was sent deficient on June 18, 2004. The operator responded to the deficiencies on July 2, 2004. The response was assigned Task ID #1979 and is currently under review by the Division.

### **2. Signs and Markers**

The mine permit ID sign located at the contact point of the public access to the permit area contained the required information. Other signs and markers observed during the inspection met the coal rules.

### 3. Topsoil

Five topsoil piles are shown on Plate 6 "As Constructed Surface Facilities Deadman Canyon." They are topsoil piles A, C, F, G, and J. An additional topsoil stockpile is located in the left fork and is shown on Plate LF-1. These stockpiles may have been seeded with the mix described on page 3-21 of the Mining and Reclamation Plan (MRP), but most of the stockpiles have been in existence since 1986 and the seed mix may have been altered since then.

The topsoil stockpiled in Deadman Canyon totals 365,330 cu yds (MRP, pg 2-4). The quality of the material is described in Appendix M. An additional volume of substitute topsoil is identified on the outslopes of the Apex truck loadout (1,700 cu yds) and the outslope of the shop warehouse complex (5,240 cu yds). The total topsoil and substitute topsoil stored to reclaim the 34.2 acre disturbed area in Deadman Canyon is therefore 372,270 cu yds. This will cover the disturbed area with 6 inches at final reclamation.

Topsoil piles A (by the Administration office) and F (opposite the Apex Mine) were well vegetated, although they had been grazed so there were few seed heads on the grasses. Both of these topsoil stockpiles are at the base of west facing slopes. Some of the plants identified on topsoil pile A were Louisiana sage, sagebrush, wheat grass, woods rose and rabbit brush. Plants were not identified on topsoil pile F as a large bull was standing on the topsoil pile. It was noted however, that topsoil stockpile F has been somewhat impacted by coal fines from the conveyor exiting the Apex Mine; in the ditch at the base of stockpile F the coal fines were over 6 inches deep. The Apex Mine has been shut down since 1994 and no further accumulations of coal fines are expected.

The topsoil piles on the east facing side of Deadman canyon are C, G, and J. None of these piles are well vegetated. Topsoil pile G is actually the embankment of an unused pond. Weeds such as halogeton and curlycup gumweed dominate the surface of topsoil pile G and provide some vegetative cover. Straw bales have been allowed to deteriorate around this stockpile after it was determined that the vegetative cover was adequate to prevent erosion (see MRP, Appendix V).

The lack of growth on the piles C and J is probably due to the steep slope (angle of repose) and the lack of gouging of the surface for water harvesting. In contrast, the ditches around piles C and J are well vegetated. The possibility for lessening the slope of topsoil pile C by spreading the soil out around the power pole was discussed with Mr. Glassen. Topsoil pile C is 8 ft high and contains 6,829.55 cu ft (Plate 37).

The ditches of topsoil pile J were crowded with mature sagebrush (about 4 ft high), penstamen and some grasses were noted growing at the base of the pile, and a prickly pear cactus was growing on the slope of the pile, but most of the pile is unvegetated and stands at the angle of repose. Grasses and penstamen at the base of this steep pile had been grazed. The volume of stockpile J is established as 94,500 cu yds on page 2-4 of the MRP. However, no cross sections or survey of Topsoil pile J could be found in the plan. The cross sections or survey for topsoil pile

J should be provided to the Division.

Unfortunately, there is no room for reducing the slope of topsoil pile J which is at the mouth of a side canyon at the edge of the Aberdeen truck loop. This truck loop will become the only active loading area of the mine in the near future as Summit Creek Lease areas are accessed through the Aberdeen Mine and plans are to decommission the Pinnacle Mine. The Division and Permittee should work towards getting vegetation established on piles C and J.

Substitute topsoil on the outslope of the Apex Loadout is covered by about three inches of coal fines. Some plants identified growing on the substitute topsoil were bitterbrush, rabbitbrush, snowberry, and various grasses. The substitute topsoil vegetation had also been grazed heavily. Again, there should be no further deposition of coal fines at this location because of the Apex Mine closure.

The substitute topsoil pile on the shop slope has not been impacted by coal fines. Some of the plants noted on this slope were various grasses, a vetch, woods rose, rabbitbrush, service berry, flax, spurge, and gumweed.

Page 2-3 and Plate 6 of the MRP both indicate that these substitute topsoil piles were sampled, and the results would be added to the MRP. The analytical results from the sampling could not be found. The Permittee should include the results of the sampling of the substitute topsoil into the MRP.

The topsoil stockpile in the left hand fork of Deadman's Canyon had been gouged and had a very low profile. (MRP, Appendix W provides the soil information and estimates 750 cu yds salvaged from the 0.24 ac disturbance. This should provide 1 ft 10 inches of topsoil over the 0.24 ac disturbed area). The left fork topsoil pile is well vegetated. Some plants identified growing on this stockpile were sagebrush, wild rye, and a blue stemmed grass.

#### **4.d Hydrologic Balance: Water Monitoring**

Second quarter 2004 water monitoring information is in the EDI pipeline. The information needs to be reviewed and approved so that it can be uploaded. Water monitoring is current.

#### **7. Coal Mine Waste, Refuse Piles, Impoundments**

Appendix Q of the MRP indicates that the Wildcat Loadout will be the location for disposal of waste from the Centennial Mine site. Appendix Q makes reference to page and section numbers in the Wildcat MRP. The Wildcat plan has been revised and these references are no longer accurate. The Permittee should change references in Appendix Q when the reformatting of the Wildcat MRP is complete.

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**9. Protection of Fish, Wildlife and Related Environmental Issues**

Many pinyon trees on the slopes adjacent to the Aberdeen Mine were noted to have died. If dust was a contributing factor to the loss of trees, it was not coal dust. The Aberdeen Mine truck loadout was observed to emit very little coal fine dust. The ROM coal is large, 8" minus and has a high moisture content, about 7%. The coal travels on a covered conveyor through an enclosed transfer point and an enclosed drop chute into the trucks. There was no coal dust noted. The Permittee has done a great job of controlling coal fines in the vicinity of the Aberdeen Mine loadout.

**22. Other**

Observed the condition of the AML project directly east of the Administration building and above topsoil pile A. This project used locally available gravel to fill a shaft and used immediately adjacent soils for cover over the fill. The work was completed in 2002. The access to the shaft (within the Permittee's disturbed area) is vegetated and was not noticeably affected by the work. We noticed settling and a crack at the surface of the shaft fill (about 1ft wide X 18 inches deep). Weedy vegetation is growing on the site. At the request of Andalex Resources Inc Tower Division, the AML contractors worked around and saved several pine trees growing in the vicinity of the shaft.