



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

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March 18, 1998

TO: File

THRU: Joe Helfrich, Permit Supervisor *JH*

FROM: Jess Kelley, Reclamation Specialist *JK*

RE: UC-3 Culvert Extension, Horizon Coal Company, LLC, Horizon Mine, ACT/007/020-97D, Folder #2, Carbon County, Utah

SUMMARY:

In 1997, the turnaround area at the confluence of Portal Canyon and Jewkes Creek was enlarged. The pad in that area was extended approximately 100 feet up Jewkes Creek and the bypass culvert underlying the pad was also lengthened to accommodate the extension. This enlargement became inextricably connected with 2 violations (N97-45-1-1 and N97-26-7-1) which the Division issued at about the same time. This amendment was finally redesignated Amendment 97D and submitted for Division approval on December 10, 1997.

The Division reviewed the December 10 submittal and, because of more confusion of the issues among the 3 submittals, issued a letter outlining the deficiencies in Amendment 97D on January 21, 1998. From December 10, 1997 until the early part of March 1998, the permittee submitted a great deal of material and met with the Division a number of times in trying to correct the deficiencies set forth in that letter. Finally, on March 11, 1998, this process culminated in the permittee's making of a final submittal at the request of the Division. This memorandum constitutes this writer's technical review of the final version of the UC-3 Culvert amendment as it emerged from this process.

TECHNICAL ANALYSIS:

OPERATION PLAN

RELOCATION OR USE OF PUBLIC ROADS

Regulatory Reference: 30 CFR Sec. 784.18; R645-301-521, -301-526.

Analysis:

In 1997, the turnaround area at the confluence of Portal Canyon and Jewkes Creek was enlarged. This enlargement was designated Amendment 97D. The pad in that area was extended approximately 100 feet up Jewkes Creek and the bypass culvert underlying the pad, culvert UC-3, was

also lengthened to accommodate the extension.

The pad and bypass culvert modifications done under Amendment 97D involved the removal of a hillside adjacent to the enlarged pad area. Since this hillside was within the right-of-way of a public road (Carbon County Consumers Road), the permittee has provided documentation that Carbon County has approved the location of this operation within that right-of-way, as required by R645-301-521.133. This documentation is in the form of two approval letters from Carbon County to the permittee. These letters are found in Appendix 4-1.

Findings:

The plan fulfills the requirements of this section.

RECLAMATION PLAN

MAPS, PLANS, AND CROSS SECTIONS OF RECLAMATION OPERATIONS

Regulatory Reference: 30 CFR Sec. 784.23; R645-301-323, -301-512, -301-521, -301-542, -301-632, -301-731.

Analysis:

Reclamation backfilling and grading maps.

In 1997, the turnaround area at the confluence of Portal Canyon and Jewkes Creek was enlarged. This enlargement was designated Amendment 97D. The pad in that area was extended approximately 100 feet up Jewkes Creek and the bypass culvert underlying the pad, culvert UC-3, was also lengthened to accommodate the extension.

The permittee revised Plate 3-7--Reclamation Topography to show the anticipated final surface configuration of the culvert and pad extension area of Amendment 97D. Plate 3-7 also shows the locations of 8 cross sections which were derived from this map and are shown on Plate 3-7A--Post Mining Cross Sections.

The permittee used the cross sections shown on Plate 3-7A to derive cut-and-fill volume estimates for final reclamation. These estimates are shown in Table 3-1, page 3-30. They show an estimated cut volume of approximately 11,695 cubic yards and an estimated fill requirement of approximately 15,935 cubic yards. The deficit of 4,240 cubic yards will be made up with stockpiled topsoil, of which there are approximately 14,717 cubic yards, as shown in Appendix 8-1. Since the area to be topsoiled is approximately 5.49 acres, this will make for a layer almost 20 inches in thickness. As explained in Appendix 8-1, the topsoil will be distributed evenly over the recontoured area and will *not* be used to construct fills or fill in depressions.

Plates 3-7 and 3-7A were certified January 16, 1998 by Richard B. White, a professional engineer registered in the state of Utah.

Final surface configuration maps.

In 1997, the turnaround area at the confluence of Portal Canyon and Jewkes Creek was enlarged. This enlargement was designated Amendment 97D. The pad in that area was extended approximately 100 feet up Jewkes Creek and the bypass culvert underlying the pad, culvert UC-3, was also lengthened to accommodate the extension.

The permittee revised Plate 3-7--Reclamation Topography to show the anticipated final surface configuration of the culvert and pad extension area of Amendment 97D. This map was certified January 16, 1998 by Richard B. White, a professional engineer registered in the state of Utah.

Findings:

The plan fulfills the requirements of this section.

BONDING AND INSURANCE REQUIREMENTS

Regulatory Reference: 30 CFR Sec. 800; R645-301-800, et seq.

Analysis:

Determination of bond amount

In 1997, the turnaround area at the confluence of Portal Canyon and Jewkes Creek was enlarged. This enlargement was designated Amendment 97D. The pad in that area was extended approximately 100 feet up Jewkes Creek and the bypass culvert underlying the pad, culvert UC-3, was also lengthened to accommodate the extension.

Amendment 97D turned into a rather lengthy process which involved several submittals by the permittee and several meetings between the permittee and the Division. In the process, the disturbed area, on which the original reclamation cost estimate was based, shrank from approximately 7.5 acres to 5.49 acres. Thus, no increase in the reclamation cost estimate or the approved reclamation bond was necessary and none was made.

Findings:

The plan fulfills the requirements of this section.

RECOMMENDATION:

It is recommended that this amendment be approved and included as part of the approved plan.