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

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OK

March 5, 2002

TO: Internal File  
THRU: Priscilla Burton, Team Lead *PB*  
FROM: Wayne H. Western, Reclamation Specialist III *WHW*  
RE: New Coal Stockpile Area for the Savage Coal Terminal AM02A

**SUMMARY:**

On February 28, 2002, the Division received amendment AM02A for the Savage Coal Terminal. The Permittee proposes to strip topsoil from within the disturbed area boundaries. The topsoil will be stockpiled and the stripped area will be used for additional coal storage.

**TECHNICAL ANALYSIS:**

**ENVIRONMENTAL RESOURCE INFORMATION**

**PERMIT AREA**

Regulatory Requirements: 30 CFR 783.12; R645-301-521.

**Analysis:**

The Permittee will not change the permit or disturbed area boundaries.

**Findings:**

The Permittee has met the minimum regulatory requirements for supplying the Division with information about the permit area.

TECHNICAL MEMO

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## OPERATION PLAN

### MINING OPERATIONS AND FACILITIES

Regulatory Reference: 30 CFR 784.2, 784.11; R645-301-231, -301-526, -301-528.

#### Analysis:

##### General

The Savage Coal Terminal is used for as a load out facility for coal. The coal can either be shipped out on truck or by rail. The proposed amendment will enable the Permittee to store additional amounts of coal on site. The area that is scheduled for coal storage was originally scheduled to be a coal refuse site.

#### Findings:

The Permittee has met the minimum requirements for giving the Division information about the general activities that will be conducted at the site.

### MAPS, PLANS, AND CROSS SECTIONS OF MINING OPERATIONS

Regulatory Reference: 30 CFR Sec. 784.23; R645-301-512, -301-521, -301-542, -301-632, -301-731, -302-323.

#### Analysis:

##### Mining facilities maps

Plate 3-2, Savage Coal Terminal Facility Map, show the location of the facilities, supporting structures, roads, rail lines and the topography. The plate has been modified to show the addition of the new coal stockpile area.

While the contour lines are shown on Plate 3-2, the elevations for the contours are not given. The Division needs to have the contour elevations shown in order to compare the operational phase with the reclamation phase. Note: the contour interval is shown to be two feet on Plate 3-2.

#### Findings:

The information provided in the proposed amendment is not considered adequate to meet the requirements of this section. Before approval, the Permittee must provide the following in accordance with:

**R645-301-521.150**, The Permittee must show the elevation of the topographic lines on Plate 3-2.

## **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**

Plate 3-7, Post Mining Topography and Drainage, show the contours for the site after reclamation. The area that is proposed for the expanded coal stockpile is shown on Plate 3-7 as a reclaimed refuse pile. The reclaimed refuse pile is shown as mound. However, the existing topography is shown as a gently dipping surface. Without the refuse to cover, the Permittee will most likely restore the area to the existing topography rather than a mounded area.

#### **Findings:**

The information provided in the proposed amendment is not considered adequate to meet the requirements of this section. Before approval, the Permittee must provide the following in accordance with:

**R645-301-542.200**, The Permittee must revise Plate 3-7 to show how the new coal stockpile area will be reclaimed. Plate 3-7 shows that the area will contain a mound that is buried coal refuse. The current plan is to use the area for coal storage instead of a refuse pile.

## **BONDING AND INSURANCE REQUIREMENTS**

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

#### **Analysis:**

##### **Determination of bond amount**

The Permittee did not include any bond calculations in the proposed amendment. They did mention reclamation costs in the cover letter. Since the cover letter will not be incorporated into the MRP, the Permittee needs to include bond calculations with the amendment.

The Division reviewed the MRP, and was unable to locate detailed demolition, earthwork, or vegetation costs estimates. Before the Division can evaluate changes in the

**TECHNICAL MEMO**

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reclamation cost, they must have a detailed reclamation cost estimate. The reclamation cost estimate should be based on the procedures outline in the OSM reclamation cost handbook.

**Findings:**

The information provided in the proposed amendment is not considered adequate to meet the requirements of this section. Before approval, the Permittee must provide the following in accordance with:

**R645-301-542.200**, The Permittee must give the Division detailed reclamation cost estimates for the entire site including the new coal stockpile area. The reclamation cost estimates should be based on the OSM reclamation handbook. If the Permittee does not have access to the handbook, the Division will supply a copy.

**RECOMMENDATIONS:**

The Division should deny the amendment until the Permittee complies with the above stated deficiencies.

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