

# TECHNICAL MEMORANDUM

## Utah Coal Regulatory Program

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November 1, 2005

TO: Internal File

THRU: Pamela Grubaugh-Littig, Permit Supervisor  
Priscilla W. Burton, Environmental Specialist III/Soils, Team Lead

FROM: James D. Smith, Environmental Specialist III/Hydrology

RE: MRP Rewrite, Andalex Resources, Inc., Wildcat Loadout, C/007/0033, Task ID #2277

### **SUMMARY:**

Andalex originally applied for a mining permit for the Wildcat Loadout in 1988. The MRP was formatted and organized to match the Coal Mining Rules that were in effect at that time. The Division received this amendment April 8, 2004. The amendment mainly reorganizes information in the Wildcat Loadout MRP so that it more closely matches the format and organization of the current R645 Coal Mining Rules. No changes have been made to the appendices, figures, or maps.

There are comments on items not related to the reorganization of the mine plan in this Tech Memo, but the Findings for this Tech Memo are that the Rewrite amendment should be approved. A Division Order or other means will be used to address deficiencies not relating to this reorganization.

Permittee's Action		DOGM's Action	
Original <a href="#">submittal</a>	04/08/2004	Assigned Task # 1911	
		Tech Memo – Geology and <a href="#">Hydrology</a>	06/30/2004
		<a href="#">TA</a>	
Response to Task # <a href="#">1911</a>	12/10/2004	Assigned Task # 2089	
		Tech Memo – Geology and <a href="#">Hydrology</a>	02/10/2005
		Deficiency <a href="#">Letter</a>	02/17/2005
Response to Task # <a href="#">2089</a>	06/30/2005	Assigned Task # 2277	
		Tech Memo – Geology and <a href="#">Hydrology</a>	09/30/2005

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**TECHNICAL ANALYSIS:**

**ENVIRONMENTAL RESOURCE INFORMATION**

Regulatory Reference: Pub. L 95-87 Sections 507(b), 508(a), and 516(b); 30 CFR 783., et. al.

**HYDROLOGIC RESOURCE INFORMATION**

Regulatory Reference: 30 CFR Sec. 701.5, 784.14; R645-100-200, -301-724.

**Analysis:**

UMC 783.13 Description of Hydrology and Geology: General Requirements in Chapter III of the old MRP is under 711.100 in the reformatted MRP. The sedimentation and control plan, including impoundments, diversions and water monitoring plans are discussed in the Engineering Chapter 5 under 512.240: information in section 512.240 was taken from UMC 784.16 Reclamation Plan: Ponds, Impoundments, Banks, Dams, and Embankments.

Figure VII-1 shows the general stratigraphy of the central and southern Wasatch Plateau. Figure VII-2 shows the location of the Wildcat Loadout permit and adjacent areas, including Garley Canyon and the Garley Canyon Spring.

Figures showing details of diversion design, the culvert nomograph, pond outlet protection, emergency spillways, ditch configurations, and riprap sizing are in the reformatted MRP. Figures have been renumbered, and page numbers in the Table of Contents now match the page locations of the figures in the plan.

*Alternative Water Supply Information*

Alternative Water Supply and Alternative Water Source Information is in Sections R645-301-624.120 and R645-301-727. All water used on site is hauled in. Andalex has water rights on the seep in Garley Creek, located approximately ½ mile SW of the permit area boundary (Figure VII-2), outside the permit and adjacent areas. If developed, water from this seep will be used for dust suppression. Ephemeral drainages have been diverted around the disturbed area. No springs or seeps exist on or near the permit area.

### **Sampling and Analysis**

Section R645-301-512.240, Impoundments, Water Monitoring Plans is the location for Sampling and Analysis information. The Permittee commits that they and their lab will follow "Standard Methods for the Examination of Water and Wastewater" for all water samples.

### **Groundwater Monitoring Plan**

Section R645-301-724.200 refers to Section 711.100 as the location for baseline groundwater information. Information in 711.100 indicates that drilling on the site confirmed that no ground water is present, so ground water has not been monitored for this operation.

### **Surface-Water Monitoring Plan**

Section R645-301-724.100 refers to Section R645-301-711.100 for baseline surface-water information. Information is in 711.100 under the heading Surface Water Hydrology. The monitoring plan is in 512.240 in the section Water Monitoring Plans. Tables V-10 and V-11 summarize the baseline and operational monitoring plans. Locations are shown on Plate 15.

### **Findings:**

Information provided in the MRP meets the Hydrologic Resource Information requirements of the regulations.

## **OPERATION PLAN**

### **HYDROLOGIC INFORMATION**

Regulatory Reference: 30 CFR Sec. 773.17, 774.13, 784.14, 784.16, 784.29, 817.41, 817.42, 817.43, 817.45, 817.49, 817.56, 817.57; R645-300-140, -300-141, -300-142, -300-143, -300-144, -300-145, -300-146, -300-147, -300-147, -300-148, -301-512, -301-514, -301-521, -301-531, -301-532, -301-533, -301-536, -301-542, -301-720, -301-731, -301-732, -301-733, -301-742, -301-743, -301-750, -301-761, -301-764.

### **Analysis:**

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**Ground Groundwater Monitoring Plan**

Section 731.211 refers to Section 711.100 as the location for the ground-water monitoring plan. Information in 711.100 indicates that drilling on the site confirmed that no ground water is present, so ground water is not monitored for this operation.

**Surface-Water Monitoring Plan**

Sections R645-301-731.220 and 731.221 refer to 512.240 as the location for the surface-water monitoring plan. The monitoring plan is in 512.240 in the section Water Monitoring Plans. Tables V-10 and V-11 summarize the baseline and operational monitoring plans. Locations are shown on Plate 15.

**Findings:**

Information provided in the MRP meets the Operation Plan Hydrologic Information requirements of the regulations.

**RECOMMENDATIONS:**

The proposed amendment should be approved.