

# TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

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February 7, 2007

TO: Internal File

THRU: D. Wayne Hedberg, Permit Supervisor *DWH*  
Steve Fluke, Senior Reclamation Hydrogeologist *STF*

FROM: Wayne H. Western, Environmental Scientist III *WHW*

RE: Pasture Pond Expansion, Sunnyside Cogeneration Association, Sunnyside Refuse/Slurry, C/007/0035, Task ID #2644

**SUMMARY:**

On September 5, 2006, the Division received an application from Sunnyside Cogeneration Association to expand the Excess Spoil Disposal Area #2 by modifying the slope, and increase the size of the Pasture Sediment Pond.

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**TECHNICAL ANALYSIS:**

**OPERATION PLAN**

**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**

The Permittee did not meet the requirements of this section. The Permittee must update all maps and cross sections that show areas that will be affected by the pastor pond expansion. In addition the Permittee must update the text to show the changes to the area.

**Findings:**

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

DR645-301-521, The Permittee must update all maps and text in the MRP to show the changes associated with the pastor pond. Such maps include but are not limited to 5-2, 5-2C, 5-2D, 5-2E, 5-3 and 5-4. In addition the Permittee must also update all sections of the MRP to show the changes. Such sections include but are not limited to 562.100, where the Permittee describes the clear water sediment pond.

**RECLAMATION PLAN**

**BONDING AND INSURANCE REQUIREMENTS**

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

**Analysis:**

**Determination of Bond Amount**

The Permittee did not meet the minimum requirements of this section. The Permittee must update the reclamation cost estimate with information on the changes to the reclamation plan. Those changes include but are not limited to mass balance calculations, haul distance and equipment productivity. The Division needs to have the updated reclamation costs to ensure reclamation in the event of bond forfeiture.

#### **Terms and Conditions for Liability Insurance**

#### **Findings:**

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

**R645-301-830.140**, The Permittee must include update reclamation cost estimates to reclaim the site based on the changes to the reclamation plan. Specifically, the Permittee must update the bond calculations and the reclamation plan as needed to show the changes to the bond and reclamation plan.

#### **RECOMMENDATIONS:**

The Division should deny the amendment until all of the above mentioned deficiencies have been addressed.