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

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December 16, 1997

TO: File

THRU: Daron Haddock, Permit Supervisor

DH

FROM: Wayne H. Western, Senior Reclamation Specialist *WHW*

RE: Clean Coal Stock Pile Area Expansion, Cyprus Plateau Mining, Willow Creek, ACT/007/038-971, File #2, Carbon County, Utah

SUMMARY:

On September 30, 1997, the Permittee for the Willow Creek Mine submitted amendment 971 that proposed to expand the clean coal stock pile area. The expansion of the clean coal stock pile would increase the disturbed area by 3.9 acres. The Permittee also requests to make changes to the reclamation of the School House Canyon refuse site and reclamation of the pre-SMCRA cut slopes.

On December 12, 1997 the Permittee met with the Division to discuss the clean coal stock pile area expansion. The Permittee provided the Division with updated maps and text. The Permittee also helped the Division locate information that was submitted in the September 30, 1997 submittal and not clearly labeled.

TECHNICAL ANALYSIS:

ENVIRONMENTAL RESOURCE INFORMATION

PERMIT AREA AND PREMINING CONDITIONS

Regulatory Requirements: R645-301-521.

MAPS, PLANS, AND CROSS SECTIONS OF RESOURCE INFORMATION

Regulatory Reference: 30 CFR Sec. 783.24, 783.25; R645-301-323, -301-411, -301-521, -301-622, -301-722, -301-731.

Analysis:

Contour Maps

Map 3.4-8, Operations Contour Map, shows the expanded disturbed area boundary. Map 3.4-8 shows the contours in and around the proposed expansion area. Map 3.4-8 meets the requirements of R645-301-150 and R645-301-151 by showing the angle of inclination (contour elevations) along the prevailing slope extending 100 linear feet above and below the area to be disturbed.

Findings:

The Permittee met the requirements of R645-301-150 and R645-301-151.

OPERATIONAL PLAN

OPERATIONAL ENGINEERING

Regulatory Reference: 30 CFR Sec. 784.2, 784.11; R645-301-231, -301-526, -301-528, -301-521, -301-526.

Mining Operations And Facilities

Type and Method of Mining Operations

Analysis:

Figure 1, Soil Sample Locations map, shows the maximum extent of the expanded clean coal pile. The east boundary of the coal pile is also the permit and disturbed area boundary.

The Division is concerned about how the Permittee will keep coal from going outside the disturbed area. The Permittee states that because of the steep slope placing any barriers to prevent coal from going outside the disturbed area is impractical. The Permittee will instruct the people operating the coal storage area to avoid placing coal near the disturbed area boundary.

Findings:

The Permittee met the requirements of R645-301-521.180 and R645-301-521.190.

RECLAMATION PLAN

GENERAL REQUIREMENTS

Analysis:

In Section 3.4-6(1) of amendment 97I under the headings of Phase I Reclamation and Demolition the Permittee changes the commitment to removal all the existing structures to a commitment to remove all existing aboveground structures. The Division is concerned about changing the commitment to remove all above ground structures. Footings and foundations could be considered below ground structure and therefore exempt from demolition and removal.

The Permittee changes another reclamation commitment from removing all piping in the permit area to removing all piping in the permit area to the extent practical.

The Division is aware that there are underground utilities in the permit area and the removal of

those utilities is not required under reclamation. The Division realizes that in some cases leaving pipes in place will result in less environmental harm than removing the pipes. Therefore, the Division does not expect the Permittee to removal all underground utilities as part of reclamation. To avoid confusion the Permittee needs to list those underground utilities that will be left in place and describe why those utilities should be left in place.

Findings:

The Permittee failed to meet the requirements of R645-301-541.200 by not committing to remove all underground structures unless approved for the postmining land use.

The Permittee failed to meet the requirements of R645-301-121.100 by not stating in a clear and concise manner what underground utilities they plan on leaving as part of the postmining land use.

Bonding and Insurance Requirements

Determination Of Bond Amount

Analysis:

The Permittee supply the Division with updated reclamation cost information. The cost to reclaim the coal pile expansion area is \$49,537. The additional amount is less than 5% of the reclamation cost. The Division usually does not require additional bond to be posted when the increase is less than 5%.

Findings:

The Permittee met the requirements of R645-301-830.140.

Recommendation:

Approve the clean coal pile area expansion.