



State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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December 8, 1997

TO: File

THRU: Daron Haddock, Permit Supervisor *DH*

FROM: Michael J. Suflika, Reclamation Hydrologist *MS as is*

RE: Clean Coal Storage Area Expansion, Cyprus Plateau Mining Co., Willow Creek Mine, ACT/007/038-97I, File #2, Carbon County, Utah.

SYNOPSIS

On September 30, 1997 the Division received an amendment to the M&RP requesting to expand the coal storage facility and modify the runoff facilities. This Technical Analysis addresses the Hydrology aspects of that submittal. Due to the lateness of the season, the Operator would like start construction immediately and has requested that discrepancies be dealt with by stipulation. That is seen as possible. **Due to the lateness of the review, the Reclamation portion of the submittal has NOT been entirely reviewed as part of this TA.** This will allow the Operator to proceed with construction and, if necessary, respond to Reclamation discrepancies at a later time.

TECHNICAL ANALYSIS

BASELINE ENVIRONMENTAL RESOURCE INFORMATION

HYDROLOGIC RESOURCE INFORMATION

Regulatory Reference: R645-301-723 through 726, 728, 729,

Analysis:

The proposed modifications do not affect the baseline information, including sampling and analysis, CHIA, modeling, PHC, surface water monitoring, and ground water monitoring.

Findings:

The plan is in compliance with the above regulations.

OPERATION PLAN**HYDROLOGIC INFORMATION**

Regulatory Reference R645-301-720

Analysis:

There appear to be two minor drafting mistakes that need to be cleaned up. On Map 3.4-4 (E) and (A&B) there are two entirely different ditches with the same designation CGD-6. The ditch on (E) has three designations for one ditch which is confusing. The second item needing clarification no designation could be found for the riprap thickness for the emergency spillway on pond 011. See Map 3.4-6 and Appendix 3.4E, Page 7.

Finding:

Information provided in the proposed amendment is not considered adequate to meet the requirements of these sections of the regulations. Prior to approval the Operator must provide the following in accordance with:

R645-301-722.500, provide, "maps to adequately represent the existing land surface configuration of proposed disturbed areas".

Regulatory Reference R645-300-133.710

Analysis:

The main hydrologic change to the MRP is to increase the size of sedimentation pond 011 due to the increased area reporting to the pond. This area is increased since a ditch that formerly diverted drainage around the coal pile and away from the pond will be covered by the larger coal pile and the water will, in turn, drain into the pond. The pond could be reclaimed in it's previous configuration and can still be reclaimed in it's slightly larger configuration.

A second hydrologic change is the addition of a sediment trap at the unit train loadout. This is an improvement to the area which will reduce erosion. The area is only 0.5 acre and is included in the existing disturbed area. Reclamation will be easily achieved in this area.

The other hydrologic aspects of the submittal are a re-examination of existing facilities such as sedimentation pond 013, drainage ditches, and drainage culverts on the site. These facilities are

not changed. They were found to be reclaimable in the previous plan and are still reclaimable now.

Finding:

The modifications to the MRP do not alter the ability of the Operator to reclaim the site. The ammendment has, "Demonstrated that reclamation as required by the State Program can be accomplished according to information given in the permit application."

RECOMMENDATION

The ammendment can be approved in it's present form. The minor drafting errors should be corrected.

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