



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

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TO: Internal File

THRU: Wayne Western, Team Lead *WHW*

FROM: Robert Davidson, Soils Reclamation Specialist *RAD*

RE: Use of Waste Rock Amendment, Plateau Mining Corporation, Willow Creek Mine,
ACT/007/038-AM00D

SUMMARY:

Plateau Mining Corporation has submitted an amendment to use School House refuse waste rock reject from the BTU resource recovery program for graveling both underground roadways in the mine and de-gasification well access roads and pad sites. The amendment should not be approved as submitted.

TECHNICAL ANALYSIS:

OPERATION PLAN

TOPSOIL AND SUBSOIL

Regulatory Reference: 30 CFR Sec. 817.22; R645-301-230.

Analysis:

Disposal of Coal Mine Waste

The second phase of the BTU resource recovery program is to use the rock reject from the School House refuse material for graveling:

1. roads within the Willow Creek Mine, and

TECHNICAL MEMO

2. surface access roads and pads associated with the coal bed methane project, both within and outside the permit area.

The crusher reject is a coal processing waste and may be disposed of in underground mine workings in accordance with R645-301-536.520. Approval from MSHA has been given for hauling the waste rock reject back into the mine for the purpose of graveling the underground roadways (see amendment Exhibit 4). The physical nature of the rock waste will provide a durable surface for vehicle travel and help minimize dust within the mine. The Division concurs with the MSHA approval decision that the screened rock material from the School House Canyon refuse pile may be hauled back into the mine for the intended use of graveling and maintaining the underground, in-mine roads.

The second portion of the amendment requests that approval be given for using the screened rock waste from the School House Canyon refuse pile for graveling de-gasification well access roads and pad sites. Chemical and physical analyses of the material shows elevated sodium levels. Pertinent, selected results were reported as follows:

Sampling description and Date	pH	EC mmhos/cm	SAR	ESP %	Material Rating	DOGM Guidelines
Refuse Pile 8/27/99	8.4	2.27	33**	28	sodic	Unacceptable
Crusher Reject 12/13/99	8.7	1.96	49**	32	sodic	Unacceptable
Crusher Reject 2/23/00	9.4*	2.29	50**	32	sodic	Unacceptable
Road Base 2/23/00	11*	3.57	0.9		alkaline	Unacceptable

* exceeds pH>9

** exceeds SAR>15 for coarse texture

In every case, one or more parameter exceeds the Division's guidelines. Values for SAR are exceeded by a factor greater than 2 to 3 times the permissible limit in all of the crusher reject and refuse pile samples. The waste material therefore has a toxic rating and poses a significant reclamation hazard for surface soils and vegetation, and to surface waters and underground aquifers.

The crusher reject is a coal processing waste. All coal mine waste and mine development waste, either toxic or non-toxic, must be disposed of underground or in an approved refuse pile. Removing the material from the refuse pile to areas not approved for surface disposal is against regulatory standards.

Findings:

Information provided in the application is not considered adequate to meet the requirements of this section of the regulations. The applicant must provide the following in accordance with:

R645-301-528.320 and R645-301-746 through R645-301-746.120, All coal mine waste will be properly placed and disposed of in an approved refuse location that minimizes adverse effects of leachate and surface water runoff on surface and ground water quality.

RECOMMENDATIONS:

The amendment should not be approved as submitted. Crusher reject from the School House Canyon refuse pile may not be used for graveling de-gasification access roads and pads, but must be disposed of in an approved refuse pile location. The Division concurs with the MSHA decision to allow the crusher reject material to be hauled underground in the Willow Creek Mine for maintenance purposes.