



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

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TO: [REDACTED]

FROM: Peter Hess, Sr. Reclamation Specialist, Team Lead 

RE: Findings for Slope Stability Report and Coal Waste Delineation for Pond 001A, Plateau Mining Corporation, Willow Creek Mine, [REDACTED]-AM00A-2

SUMMARY:

The Division completed the initial review of the stability analysis and coal waste delineation within the pond 001A embankment on May 3, 2000 and responded to the permittee on May 9, 2000. That document aired one deficiency, which was relative to the final disposition of the coal mine waste which had been used as construction material in the pond 001A embankment.

The deficiency arose due to a conflict in the text of the original AM00A submittal, as compared to Map 22, Mine Surface Facilities Area Pre-mining/Post-mining Cross-sections. The currently approved plan for the pond 001A embankment, as shown on Map 22 indicated that the final surface configuration of the problematic embankment would be ten feet lower than it exists during the pond's operational stage. This in turn, raised concerns relative to the requirements of R645-301-542.730, as it relates to reclamation and revegetation success standards.

The permittee's round one deficiency response (dated October 23, 2000) was received in the UDNR/OGM/PFO on October 31, 2000. This technical memo is an analysis of the permittee's response to the R645-301-542.730 deficiency.

TECHNICAL MEMO

TECHNICAL ANALYSIS:

RECLAMATION PLAN

GENERAL REQUIREMENTS

Regulatory Reference: PL 95-87 Sec. 515 and 516; 30 CFR Sec. 784.13, 784.14, 784.15, 784.16, 784.17, 784.18, 784.19, 784.20, 784.21, 784.22, 784.23, 784.24, 784.25, 784.26; R645-301-231, -301-233, -301-322, -301-323, -301-331, -301-333, -301-341, -301-342, -301-411, -301-412, -301-422, -301-512, -301-513, -301-521, -301-522, -301-525, -301-526, -301-527, -301-528, -301-529, -301-531, -301-533, -301-534, -301-536, -301-537, -301-542, -301-623, -301-624, -301-625, -301-626, -301-631, -301-632, -301-731, -301-723, -301-724, -301-725, -301-726, -301-728, -301-729, -301-731, -301-732, -301-733, -301-746, -301-764, -301-830.

Analysis:

R645-301-542.730. Disposal of Coal Mine Waste in a Controlled Manner to Meet Reclamation and Revegetation Standards/Approved Post Mining Land Use.

Pond 001 will remain in place at the Willow Creek site to act as the primary means of sediment control from the reclaimed mine facilities area at least through Phase I. When the permittee receives authorization from the UDNR/OGM to remove pond 001 (following a determination that successful vegetation and effluent standards can be met) the question of the permanent disposal of the coal mine waste in the pond 001 embankment will arise. Although Waste Handling is discussed in Volume 1, Section 4.5 Engineering Design, page 4.5-22, the permittee had failed to commit to a final disposition of the coal mine waste in the pond 001 embankment. A conflict was determined to exist in the existing/approved reclamation pond for pond 001A, based on a review of the pond 001A reclamation plan cross-sections (see Map 22, Mine Surface Facilities Area, Pre-mining/Post-mining Cross-Sections, Cross Section E-E'). That drawing indicated that the embankment which contains the coal waste material would be lowered approximately ten feet to achieve the final reclamation surface contour. This in turn would expose at least some of the coal waste material to weathering, and inhibit revegetation of the embankment.

The applicants October 23, 2000 deficiency response consists of a redline revision of page 5.4-11, and addresses the final disposition of the coal mine waste buried within the pond 001A embankment. Although the permittee has stated that the revision of the reclamation pond is pending, **the disposition of the coal mine waste as it currently exists is that the material is buried under at least three feet of incombustible material.** The revised page 5.4-11 also indicates that **"upon reclamation of pond 001A, additional soil will be placed" on the coal mine waste, further reducing the probability that this material can be eventually exposed to**

weathering. In turn, a reduction in the probability for the potential to create acid and/or toxic forming byproducts also exists.

Page 5.4-11, paragraph 2 also indicates that Section 5.4.2.2 discusses the elimination of potential hazards, in that the analysis of samples of existing coal refuse from the Mine's permit area concludes that there are no significant toxicity concerns relative to these materials. This coincides with the findings made relative to R645-301-746.120 as well as the findings under R645-301-746.310 found on Page 12 of the Division's May 3, 2000 deficiency document.

Findings:

The permittee's October 23, 2000 deficiency response has committed to leave the buried coal mine waste in the pond 001A embankment in place, and place additional soil on top to further bury same. This adequately addresses the requirements relative to the final disposition of that coal mine waste thereby meeting the requirements of **R645-301-542.730**.

RECOMMENDATIONS

The permittee has adequately addressed the single deficiency aired in the Division's May 3, 2000 technical analysis relative to the final disposition of the buried coal mine waste in the pond 001A embankment.

The permittee has committed to revising the reclamation plan for the Willow Creek site, which will include a revision of Map 22, as it relates to the final surface configuration of the pond 001A embankment, and the final disposition of the buried coal waste in same.

It is recommended that C007038-AM00A be approved.