

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

July 27, 2004

OK

TO: Internal File

THRU: *Ab* Priscilla Burton, Team Lead

FROM: Wayne H. Western, Senior Environmental Scientist, Engineering and Bonding *WHW*

RE: Gravel Canyon Topsoil Stockpile Reclamation, Plateau Mining Corporation,
Willow Creek Mine, Permit C/007/0038, Task ID #1962

SUMMARY:

On June 17, 2004, the Division received amendment 1962 for a modification to the Gravel Canyon topsoil stockpile reclamation plan. Under the current approved plan Plateau Mining Corporation (PMC) was allowed to ship 97,000 CY of topsoil/growth medium to the Willow Creek Mine main facility site. PMC wanted to revise the MRP so that they could remove between 37,000 CY to 97,000 CY of material as needed to complete reclamation at the Willow Creek Mine.

PMC resented the Division with three reclamation scenarios, Scenario A was to follow the approved plan which was to remove 97,000 CY, Scenario B was to remove 65,000 CY and Scenario C was to remove 37,000 CY.

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TECHNICAL ANALYSIS:

RECLAMATION PLAN

APPROXIMATE ORIGINAL CONTOUR RESTORATION

Regulatory Reference: 30 CFR Sec. 784.15, 785.16, 817.102, 817.107, 817.133; R645-301-234, -301-412, -301-413, -301-512, -301-531, -301-533, -301-553, -301-536, -301-542, -301-731, -301-732, -301-733, -301-764.

Analysis:

The requirements to achieve approximate original contour restoration are couched in the general backfilling and grading requirements. Because there are no highwalls or other direct mining operations associated with the site, the main criterion that the Division used to evaluate the AOC requirements was would the site blend into the surrounding area.

At present the topography on cross section A-A' Exhibit 3.6-4 is a concave mound, which is a manmade feature. Under Scenerio B and C, the mound would be replaced with a V shaped valley. Canyons in the area have V shaped valley, therefore the reclaimed site would blend into the surrounding areas.

The approved reclamation plan called for the site to be returned to a V shaped valley. While the reclaimed site under Scenerio B and C may not be as steep as the approved design, the Division believes that all designs will blend into the surrounding areas.

The other requirements for achieving AOC involve hydrology and postmining land use. The hydrology issues were discussed in other sections of the TA. The postmining land use will not change.

Findings:

The information in the amendment is adequate to meet the minimum requirements of this section of the regulations.

BACKFILLING AND GRADING

Regulatory Reference: 30 CFR Sec. 785.15, 817.102, 817.107; R645-301-234, -301-537, -301-552, -301-553, -302-230, -302-231, -302-232, -302-233.

Analysis:

General

The approved plan was to remove 97,000 CY of topsoil/growth medium from the stockpile area. PMC later estimated that from 37,000 CY to 97,000 CY of material would be removed. PMC proposed three scenarios: Scenario A is the approved plan to remove 97,000 CY, Scenario B is to remove 65,000 CY and Scenario C is to remove 37,000 CY. PMC committed to supplying the Division with certified as built drawing.

The Division's main concern with backfilling a grading was slope stability. Under the approved plan, the site would be restored to a stable condition. Under Scenario B and C, the site would be restored to a gentler slope.

The Division discussed the AOC requirements in the AOC section of the TA. There were no settled and revegetated fills, excess spoil or underground development waste at the site. Therefore, PMC was not required to show compliance for those issues.

Because the AOC and stability requirements were met, the Division found that the backfilling and grading requirements were satisfied.

Findings:

The information in the amendment is adequate to meet the minimum requirements of this section of the regulations.

MINE OPENINGS

Regulatory Reference: 30 CFR Sec. 817.13, 817.14, 817.15; R645-301-513, -301-529, -301-551, -301-631, -301-748, -301-765, -301-748.

Analysis:

There are no mine openings associated with the Gravel Canyon area.

Findings:

The information in the amendment is adequate to meet the minimum requirements of this section of the regulations.

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MAPS, PLANS, AND CROSS SECTIONS OF RECLAMATION OPERATIONS

Regulatory Reference: 30 CFR Sec. 784.23; R645-301-323, -301-512, -301-521, -301-542, -301-632, -301-731.

Analysis:

Affected Area Boundary Maps

The affected area will not change because of the modification to the reclamation plan for Gravel Canyon.

Bonded Area Map

The bonded area will not change because of the modification to the reclamation plan for Gravel Canyon.

Reclamation Backfilling And Grading Maps

Exhibit 3.6-4 shows Scenerios B and C for the reclamation of Gravel Canyon. Scenerio A is the approved plan and is shown in the MRP.

Reclamation Facilities Maps

No facilities were associated with the reclamation of the Gravel Canyon site.

Final Surface Configuration Maps

Exhibit 3.6-4 showed Scenerio B and C for the reclamation of Gravel Canyon. Scenerio A is the approved plan and is shown in the MRP.

Certification Requirements.

The revised reclamation maps for Gravel Canyon were certified by Layne Jensen, who is a registered profession engineer.

Findings:

The information in the amendment is adequate to meet the minimum requirements of this section of the regulations.

BONDING AND INSURANCE REQUIREMENTS

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

Analysis:

Determination of Bond Amount

The reclamation cost estimates were based on the worst-case scenerio, which for Gravel Canyon would be Scenerio A. Under Scenerio A 97,000 CY of material would be removed from the site. Under Scenerio B and C, less material would be removed. If a lesser amount of material were removed, the reclamation costs would either remain the same or decrease. Therefore, the Division does not consider that an increase to the bond amount is needed to cover Scenerio B and C.

Findings:

The information in the amendment is adequate to meet the minimum requirements of this section of the regulations.

RECOMMENDATIONS:

The Division should approve the amendment.