



# State of Utah

DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF OIL, GAS AND MINING

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TO: File

THRU: Daron Haddock, Permit Supervisor *DQH*

FROM: Mike Suflita, Reclamation Hydrologist *MS*

RE: MRP Deficiency Punchlist, Canyon Fuel Co., LLC, Dugout Canyon Mine, PRO/007/039-97A, Folder #2, Carbon County, Utah

1. Stream buffer signs are needed at the two points where the stream enters the disturbed area and where the stream leaves the disturbed area. Talk to M. Suflita for detailed locations.

Ref. Para. 731.600.

2. There are two significant areas within the disturbed area which are marked as alternate sediment control areas which are really impoundments and need to be designed as such. Reference Plates 7-5, 7-7, and 7-8. One ASCA is northwest of DAWS-10 (I'll call it ASCA-10) and the other is northwest of DAWS-15 (I'll call it ASCA-15). ASCA 15 is about 6 acre-feet in volume as compared to the sediment pond of only 1.26 acre-feet. ASCA-10 is larger than ASCA-15 and includes a drainage area above the upstream end of ditch DD-1a. There is the potential of a storm event filling either or both of these areas and overtopping them causing off-site sediment impacts. Several options to treat this situation exist.

Ref. para. 733, 743, and 744.

3. Several areas need detail and more information to simply understand the configuration of the plan. Specifically:

-A cross-section through drainage ditches DD-2a and UD-1 showing how they will be isolated from each other as their flows go to different locations.  
See Plate 7-5.

-A cross-section through berms B-1 and B-2 showing their sizes. These are at the road edges and will need to conform to MSHA requirements of a height at least equal to the axle height of vehicles used on the road. See Plate 7-5.

-Detail of how UD-1 is conveyed into DC-2. See Plate 7-5

-Page 7-54, para. 2 describes silt fences along the top of the bank of Dugout Creek. A map is needed to show locations of these fences.

4. Ref. Pg 7-79, next to last paragraph. Diversions are designed to 10-year, 6-hour storm event. DOGM Position Paper requires all diversions, drainage ditches and culverts, leading to the sediment pond to be designed to 10-year, 24-hour storm event to be consistent with the design for sediment ponds.

5. Ref. Page 5-33, last para. There was confusion on the last TA comment in that the four silt fences were intended to be installed in the stream below the construction site. They would be installed the very first thing before construction begins and removed only after construction is completed.

6. Plates 5-3 and 5-4 do not contain sufficient detail to evaluate the riparian reclamation. Provide maps of a scale that can present the stream configuration.

7. Appendix 7-11 defines the reclamation of the site to result in rip-rap lined channel throughout the disturbed area. The regulations state: "Reclamation" means those actions taken to restore mined land as required by the R645 Rules to a postmining land use approved by the Division. ❖ The MRP states (pg. 4-7) that the postmining land use is "livestock grazing and wildlife habitat". A rip-rap lined channel is NOT consistent with wildlife habitat.

Further, the considerations expressed by the Division of Wildlife Resources (DWR) for post-mining reclamation of the stream have been completely ignored. These were pointed out in the previous Technical Analysis and were provided the Operator in a letter from the DWR. In addition, the Operator was provided a copy of the stream reclamation from the Genwal Crandall Canyon Mine as a guide for the kind of reclamation plan that would be expected for the Dugout mine. These have not been included in any manner. The present form of the reclamation plan does not conform to regulatory requirements. Please refer to the previous Technical Analysis(TA).

8. The Table of Contents for Chapters 1 through 4 has all the page entries without any page entries after the dash. For example, 4-

9. Plate 7-4, Sedimentation Pond Design, shows the sed pond culvert outfall going into Dugout Creek with a rip-rap protection at the end of the metal pipe. Plate 7-5, Disturbed Area Diversions, shows the sed pond culvert outfall as going into DC-2, the 60-inch culvert. This inconsistency should be cleared up, however, this needs to be done after consideration of the following item.

10. Regulations require minimal disturbance to the hydrologic balance. It appears that there is not a need for the 60-inch culvert pipe below the existing wooden bridge stream crossing. This is where the stream washout rejoins the main stream. Similarly, with the presently contemplated mine, the two upper reaches of culvert where the streams intersect, do not appear necessary either. Please provide justification of these reaches of culvert or propose them in the next phase of the mine operation.

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