



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

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TO: [REDACTED] File

THRU: Gregg A. Galecki, Team Lead *AG*

FROM: Wayne H. Western, Senior Reclamation Specialist *WHW*

RE: Leach Field Amendment, Canyon Fuel Company, LLC, Dugout Mine C [REDACTED]
AM01A-1

SUMMARY:

On June 29, 2001, the Division received a revised amendment for the installation of a septic system (leach field) at the Dugout Mine. The permittee proposes to make the leach field amendment an addendum to the MRP rather than incorporate the amendment into the MRP. This memo deals with the engineering and bonding aspects of the amendment.

OPERATION PLAN

MINING OPERATIONS AND FACILITIES

Regulatory Reference: 30 CFR 784.2, 784.11; R645-301-231, -301-526, -301-528.

Minimum Regulatory Requirements:

The objectives of this section is to ensure that the Division is provided with comprehensive and reliable information on proposed underground mining activities, and to ensure that those activities are allowed to be conducted only in compliance with the regulatory program.

Provide a general description of the mining operations proposed to be conducted during the life of the mine within the proposed permit area, including, at a minimum, the following: a narrative description of the type and method of coal mining procedures and proposed engineering techniques, anticipated annual and total production of coal, by tonnage, and the major equipment to be used for all aspects of those operations; and, a narrative explaining the construction, modification, use, maintenance, and removal of the following facilities (unless retention of such facility is necessary for postmining land use is specified.) The following facilities must be described: dams, embankments, and other impoundments; overburden and topsoil handling and storage areas and structures; coal removal, handling, storage, cleaning, and transportation areas and structures; spoil, coal processing waste, mine development waste, and noncoal waste removal, handling, storage, transportation, and disposal areas and structures; mine facilities; and, water pollution control facilities.

TECHNICAL MEMO

Analysis:

General

The permittee proposes to make the leach field amendment an addendum to the MRP rather than incorporate the amendment into the MRP. Therefore, the permittee addressed most of the engineering and bonding regulations. The Division will not make specific comments about most items that are not directly related to the leach field. For example, the Division will not comment on non-related items coal recovery or sealing mine openings.

The construction of the leach field will take place in two phases. The first phase will involve the installation of the sewer line from the septic tank to the leach field. The second phase is the construction of the leach field. The septic tank, pipeline and leach field are shown on Plate 1-5, Pipeline Layout. The leach field will be approximately 1.34 acres and a yard box, seven junction boxes, and seven laterals will be constructed in the leach field.

The pipeline will be placed in a trench approximately 48 inches in depth. Part of the trench will be dug in the road drainage ditch.

The septic tank and part of the pipeline will be located in the existing disturbed area. The leach field will be within a new disturbed area boundary. Part of the pipeline will be outside the disturbed area boundary.

Findings:

The permittee met the minimum requirements for this section of the regulations.

EXISTING STRUCTURES:

Regulatory Reference: 30 CFR 784.12; R645-301-526.

Analysis:

No structures exist at the leach field site. A drainage ditch for the county road is located in part of the area that the permittee proposes to install the pipeline.

Findings:

The permittee met the minimum requirements of the regulations that deal with existing structures.

RELOCATION OR USE OF PUBLIC ROADS

Regulatory Reference: 30 CFR 784.18; R645-301-521, -301-526.

Analysis:

The permittee proposes to use the install the sewer pipeline within the Carbon County right-of-way. In a letter date February 21, 2001, from Bill Krompel, Carbon County Commissioner, the permittee is granted conditional permission to install the sewer pipeline within the right-of-way. Mr. Krompel states "Please be advised that your request is granted, with the understanding that Canyon Fuel assumes full responsibility to restore Dugout Road and shoulders to the original conditions upon completion of project."

The Permittee will place warning signs and flag persons at the site to alert the public to the dangers associated with the installation of the pipeline on or near the county road.

Findings:

The permittee met the minimum requirements of the regulations that deal with relocating or use of a public road.

SIGNS AND MARKERS

Regulatory Reference: 30 CFR Sec. 817.11; R645-301-521.

Analysis:

The permittee committed to install mine and permit identification signs as needed for the installation of the leach field and pipeline.

Findings:

The permittee met the minimum requirements of the regulations that deal with signs and markers.

USE OF EXPLOSIVES

Regulatory Reference: 30 CFR Sec. 817.61, 817.62, 817.64, 817.66, 817.67, 817.68; R645-301-524.

Analysis:

No explosives will be used.

TECHNICAL MEMO

Findings:

The permittee met the minimum requirements of the regulations that deal with the use of explosives.

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:

The permittee proposes to leave the sewer pipeline and leach field piping and concrete boxes in place as part of final reclamation. The Permittee wants leave those structures in place because removing them will cause more harm than good. The Division will allow the permittee to leave the pipeline and concrete boxes in place. The Division concurs with the analysis that removing the structures will cause more harm than good.

Findings:

The permittee met the minimum general reclamation requirements.

APPROXIMATE ORIGINAL CONTOUR RESTORATION

Regulatory Reference: 30 CFR Sec. 784.15, 785.16, 817.102, 817.107, 817.133; R645-301-234, -301-270, -301-271, -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 leach field will be backfilled and grade to the approximate original contours.

Findings:

The permittee met the minimum reclamation requirements for meeting the approximate original contour requirements.

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:

The leach field will be backfilled and graded to meet the minimum regulatory requirements. The leach field is a small area that does not need a detailed analysis. There are not highwalls, spoil piles, or depressions at the site. The final contours as shown on Plate 5-1 indicate that the reclaimed slopes will not exceed the angle-of-repose and will be gentle enough to exclude a detailed slope stability study.

Findings:

The permittee met the minimum reclamation requirements for meeting the backfilling and grading requirements.

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:

Bonded area map

Plate 3-2, Pipeline Layout, shows the location of the permit area, the current disturbed area, the proposed leach field area and the sewer pipeline. This information is adequate for the Division to determine the location of the new facilities.

Findings:

The permittee met the minimum requirements of the regulations that deal with maps, plans and cross section.

TECHNICAL MEMO

BONDING AND INSURANCE REQUIREMENTS

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

Analysis:

Determination of bond amount

The current bond amount is for \$3,781,000. The proposed leach field would increase the reclamation costs by \$85,575, which is 2% of the bond. The Division usually does not increase bond if the cumulative reclamation increase is less than 5%.

Findings:

The permittee met the minimum reclamation requirements for meeting the bonding requirements.

RECOMMENDATIONS:

The Division should approve the leach field amendment.