

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

October 9, 2003

TO: Internal File

FROM: Peter H. Hess, Environmental Scientist III/Engineering, Team Lead

RE: Refuse Pile As-Built Topography Map, Canyon Fuel Company, LLC., Dugout Canyon Mine, C/007/039, Task ID #1714

SUMMARY:

The permittee completed all construction related activities associated with the waste rock disposal site for the Dugout Canyon Mine in September 2003. The site is active, and receives coal mine processing waste from the processing of mine product. The permittee submitted revised text/contents pages to the mining and reclamation plan as well as a topographic map of the waste rock disposal area to address the requirements of R645-301-514.200, "as-built" certification of the approved design on September 26, 2003. The area permitted for the waste rock disposal area also includes a topsoil storage pile, a subsoil storage pile, and a containment to treat runoff from the disturbed acreage.

TECHNICAL ANALYSIS:

OPERATION PLAN

SPOIL AND WASTE MATERIALS

Regulatory Reference: 30 CFR Sec. 701.5, 784.19, 784.25, 817.71, 817.72, 817.73, 817.74, 817.81, 817.83, 817.84, 817.87, 817.89; R645-100-200, -301-210, -301-211, -301-212, -301-412, -301-512, -301-513, -301-514, -301-521, -301-526, -301-528, -301-535, -301-536, -301-542, -301-553, -301-745, -301-746, -301-747.

Analysis:

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Refuse Piles

After the initiation of mining at the Dugout Canyon Mine, the permittee found that it was necessary to permit a waste rock disposal site in order to dispose of coal mine waste, as well as unsaleable high ash coal. The permittee applied for an amendment to permit a refuse pile through the Division during October of 2002, eventually receiving Division approval to construct same.

A topographic map of the waste rock disposal facility, which also includes the topsoil storage pile and the subsoil storage pile has been submitted, as well as revised chapter pages to reflect the addition of RA Attachment 5-5, As-Built Topography Map, and a revised page 5-1, to reflect the inclusion of RA Attachment 5-5, (section **512.100, Cross sections and Maps**).

The “as-built” topography map submitted was derived from an aerial survey flown by Olympus Aerial surveys in May of 2003. The fence line depicting the permit area as well as the disturbed area is shown. Ditches and berms that retain soil and subsoil resources or direct runoff to the sediment containment are depicted as well. A gate constructed across the access road where same enters the pad area prevents unauthorized access and meets the requirements of 30 CFR 77.214 (d).

Findings:

The submittal meets the minimum regulatory requirements of the R645 coal rules for refuse pile “as-built” inspections/certifications.

MAPS, PLANS, AND CROSS SECTIONS OF MINING OPERATIONS

Regulatory Reference: 30 CFR Sec. 784.23; R645-301-512, -301-521, -301-542, -301-632, -301-731, -302-323.

Analysis:

Mining Facilities Maps

The “AS BUILT” Topography May 2003 map of the Dugout Canyon Mine waste rock disposal facility/topsoil storage/subsoil storage facility accurately depicts those facilities, as well as the permit area/disturbed area of same. The map was derived from an aerial survey conducted by Olympus Aerial Surveys in May of 2003.

Certification Requirements

The "AS BUILT" Topography May 2003 map is certified by Mr. Dave Spillman, Utah registered professional engineer, and Manager of Technical Services for the permittee. The certification is signed, stamped, and dated per the requirements of the Utah Department of Commerce, Division of Occupational and Professional Licensing.

Findings:

The minimum regulatory requirements of this section have been addressed.

RECOMMENDATION:

The submittal should be approved.