

# TECHNICAL MEMORANDUM

## Utah Coal Regulatory Program

December 30, 2003

TO: Internal File

THRU: Pamela Grubaugh-Littig, Permit Supervisor

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

RE: Disturbed Acreage Update, Chapter 1, MRP Information, Canyon Fuel Company, LLC., Dugout Canyon Mine, C/007/039, Task ID#1787

### **SUMMARY:**

The permittee received a Division approval to implement three degasification boreholes at the Dugout Canyon Mine in September 2003. Wells G-3 and G-2 were developed during October of 2003. The permittee submitted information on October 3, 2003 to add the additional disturbance for wells G-3 (0.97 acres, Task ID#1748) and G-2 (1.21 acres, Task ID# 1758) to the previously permitted 48.9 acres. A deficiency document was generated by the Division on December 3, 2003, indicating that the currently approved mining and reclamation plan did not contain a legal description of the surface area disturbed by the main mine facilities area, or the pipeline / leach field area.

The permittee responded to the December 3, 2003 deficiency document on December 24, 2003. This technical memorandum will address the adequacy of that response.

It should be noted that this memorandum will address the same deficiency noted in both technical memos noted as Task ID#1748 (Well G-3) and Task ID# 1758 (Well G-2).

### **OPERATION PLAN**

#### **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.

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**Analysis:**

**Mining Facilities Maps**

This analysis will pertain to the maps that are required under the Minimum Regulatory Requirements for identification of location purposes and their relationship to Bonding and Insurance Requirements. The maps described below reflect both affected area, and the mining facilities that were determined to be necessary.

*Minimum Regulatory Requirements (under 30 CFR Sec.800; R645-301-800, et seq.)*

*“The operator shall identify the initial and successive areas or increments for bonding on the permit application map...”*

As part of the permitting process for the development of the degasification wells (Task ID #1642) the permittee submitted a revised Plate 1-4, DUGOUT CANYON MINE PERMIT AREA, which depicts the surface area and topography of all lands which will be potentially impacted by underground coal mining operations (i.e., subsidence, or impacts due to subsidence). Plate 1-4 also identifies the following facilities that are part of the Dugout Canyon Mine operation; the waste rock facility, the pipeline/leach field area, and the three degasification wells permitted via approval of Task ID #1642. Thus, the locations of the two wells (T13S, R13E, Section 19 for G-3, and T13S, R12E, Section 24 for G-2) are accurately depicted on the permit area map.

As part of the Task ID #1642 submittal, the permittee submitted Figure 5-9, Contour Map for well G-3, and Figure 5-5, Contour Map for well G-2. These depict the “affected area” of disturbance created by the development of well G-3, and G-2 respectively.

Page 1-25 of Chapter 1, Legal and Financial Information of the Dugout Canyon mining and reclamation plan describes the acreages associated with the different areas of disturbance of the Dugout Canyon operation. This includes the Main facilities area (20.31 acres), the leach field/pipeline area (1.8 acres), and the waste rock storage facility (26.8 acres). The amendment which has been submitted contains a revised disturbed area acreage which includes the 0.97 acres associated with the disturbance associated with degasification well G-3, as well as the 1.21 acres associated with well G-2.

As part of the reclamation bond requirements, a reclamation agreement has been prepared and signed by both the Division and the Permittee. In order to update the reclamation agreement (to include the additional 0.97 acres associated with degasification well G-3, as well as the 1.21 acres associated with well G-2), it was necessary for the permittee to provide a **legal description of all areas of disturbance** associated with the Dugout Canyon Mine operation.

A legal description of the degasification wells G-3 and G-2 is provided in the degasification well stand-alone document, Chapter 1, page 1-1, **TABLE 1-1**. Well G-3 is described as being located in a portion of the N1/2 SW1/4 NW1/4 Section 19 of T13S, R13E. Well G-2 is described as being located in a portion of the N1/2 SW1/4 NE1/4 Section 24 of T13S, R13E.

Page 1-24 of Chapter 1 of the Dugout Canyon Mine mining and reclamation plan contains a legal description of the Waste Rock Storage Facility. Same is described as existing in “portions of NE1/4 SW1/4 and SE1/4 of the NE1/4 of Section 18, T14S, R12E, SLBM, Utah.”

The permittee’s response to the Division’s December 3, 2003 deficiency document (response received 12/23/2003 @ PFO) contains a legal description for the disturbances associated with the main mine facilities area, and the leach field/pipeline area, (See **APPENDIX 1-4**, Disturbed Area Legal Description). It is now possible for the Division to update the “Exhibit A” page of the reclamation agreement.

**Findings:**

Information provided in the application is considered adequate to meet the minimum requirements of the Maps, Plans, and Cross Sections of Mining Operations section of the Operation Plan regulations.

**RECOMMENDATIONS:**

This amendment should be approved.