

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

August 2, 2004

OK

TO: Internal File

FROM: Peter Hess, Environmental Scientist III, Team Lead *PHH by an*

RE: Concrete Pad Area Expansion, Canyon Fuel Company, LLC, Dugout Canyon Mine, C/007/039, Task ID #1981

SUMMARY:

The permittee submitted an application to the Division on July 2, 2004 to address an addition/extension of a concrete pad area for the purpose of enhancing material storage capability within the disturbed area of the Dugout Canyon Mine facilities area. The application was received in the Price Field Office on July 15, 2004.

This technical memo will address the adequacy of the submittal, designated as Task ID #1981, relative to the engineering discipline and bonding requirements of the R645 coal rules.

TECHNICAL ANALYSIS:

OPERATION PLAN

MINING OPERATIONS AND FACILITIES

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

Analysis:

The submittal consists of two revisions to Volume 1, Chapter 5, page 5-16 of the Dugout Canyon Mine mining and reclamation plan. The revision contained in paragraph two of page 5-16 removes reference to the temporary warehouse, storage and foreman facilities which were portable containers/trailers implemented for those purposes. Upon the completion of the office/bath house/warehouse/shop building, those temporary facilities were either removed or relocated within the mine's facilities area.

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The second revision to page 5-16 is the addition of verbiage relative to the addition of a concrete pad area east of the office/bath house/warehouse/shop building. The concrete dock area will be used for the storage of pipe and plate, and those materials will be stored on racks to enhance storage efficiency. The concrete structure will be installed such that it surrounds a large diameter HDPE culvert that carries flow in ditch DD-3, (See PLATE 7-5, DISTURBED AREA DIVERSIONS, Dugout Mine MRP). As of the date of the Task ID #1981 submittal, the concrete structure is still under construction. As such, its completed dimensions are unknown at this time. Upon the completion of the structure, the permittee will update the surface facilities map, PLATE 5-2 in the mining and reclamation plan.

Findings:

The minimum regulatory requirements of this section have been met.

RECLAMATION PLAN

BONDING AND INSURANCE REQUIREMENTS

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

Analysis:

Determination of Bond Amount

The permittee submitted a permit amendment to the Division on July 2, 2004 to adjust the reclamation bond amount to address the expansion of a concrete pad area adjacent to the office/warehouse/bath house/shop building. Those revised reclamation cost figures were reviewed by Division personnel via Task ID #1900 and determined to be adequate. Final approval for the submittal was given on May 17, 2004.

Findings:

The minimum regulatory requirements of this section have been addressed via Task ID #1900.

RECOMMENDATION:

Task ID #1981 is a minor amendment to the Dugout Canyon Mine mining and reclamation plan. It should be approved.