

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

January 11, 2007

TO: Internal File

FROM: Priscilla Burton, CPSSc, Environmental Scientist III *PWB/bjan*

RE: Disturbed Area Expansion, Canyon Fuel Company, Dugout Canyon Mine, C/007/0039, Task ID #2705

SUMMARY:

On November 22, 2006, the Division received an application to expand the Dugout Mine by 0.5 acres at the confluence of the right and left forks of Dugout Creek. The expansion and subsequent topsoil stripping is proposed as a way "to prevent impacts to topsoil currently within the disturbed area and to allow potential for expansion of the coal storage piles." No information on coal storage pile expansion was included in the amendment.

With this amendment, the Dugout mine disturbed area includes:

23.50 acres for the mine facilities

24.85 acres for the degas wells

26 acres for the refuse site

74 acres approximate total

The following deficiencies were identified with this amendment.

R645-301-234 .220, The Permittee should consider an alternative location for storage of the 1,200 yd³ of topsoil, since the topsoil storage location is known to have a cheat grass weed control problem.

R645-301-231.400, Please describe within the narrative of the amendment, the cheat grass control efforts taken, along with dates of implementation.

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TECHNICAL ANALYSIS:

OPERATION PLAN

TOPSOIL AND SUBSOIL

Regulatory Reference: 30 CFR Sec. 817.22; R645-301-230.

Analysis:

Topsoil Removal and Storage

Dugout/Soldier Canyon Storage Area [12/02/05]

The amendment indicates that the affected soil type is in mapping units 96 and 21, similar to Test Pit 5, shown on Plate 2-1.

Eighteen (18) inches of topsoil will be removed and sampled for analysis. Topsoil (estimated 1,200 yd³) will be stored at the topsoil storage site next to the Gilson Well riparian soils. Volume of stored topsoil would increase to 28,650 yd³ (Table 2-2).

Some stockpiles at the topsoil storage site are covered with cheatgrass. For this reason, placement of additional topsoil at the Soldier Canyon topsoil storage site may not be the best location. The Permittee could consider an alternative location at the main facilities site. The Division requests an update on cheatgrass control with this amendment.

Findings:

The information provided does not meet the requirements of topsoil storage operation plan. Prior to approval, please provide the following in accordance with:

R645-301-234 .220, The Permittee should consider an alternative location for storage of the 1,200 yd³ of topsoil, since the topsoil storage location is known to have a cheat grass weed control problem.

R645-301-231.400, Please describe within the narrative of the amendment, the cheat grass control efforts taken, along with dates of implementation.

RECOMMENDATIONS:

The deficiencies should be addressed prior to approval.

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