

# TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

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January 31, 2007

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TO: Internal File

THRU: Priscilla Burton, Team Lead *PWB by an*  
Pamela Grubaugh-Littig, Supervisor *PL*

FROM: *SC* Steve Christensen, Environmental Scientist II

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

## SUMMARY:

On November 22, 2006, the Division of Oil, Gas and Mining (the Division) received an application from Canyon Fuel Company, LLC (the Permittee) to revise the approved Mining and Reclamation Plan (MRP) for the Dugout Mine by expanding the disturbed area by 0.5 acres. The purpose of the expansion is to prevent impacts to topsoil currently located within the permitted disturbed area and to allow for the potential expansion of the coal storage piles.

The hydrologic information provided does not meet the requirements of the State of Utah R645-Coal Mining Rules. The proposed amendment should not be approved until the following deficiencies are addressed.

**R645-301-731**, The Permittee should provide clarification within the narrative on page 5-12 as to how Plate 5-2 (Surface Facilities) depicts the mine's official representation of the disturbed area boundary. For clarification, the same language, along with a reference to Page 5-12, should be included on Plate 5-2 as a note.

**R645-301-521.141**, The Permittee should update Plates 5-5 (Reclamation Topography) and Plate 5-6 (Reclamation Cross Sections) to reflect the additional disturbed area proposed by this amendment.

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**TECHNICAL ANALYSIS:**

**OPERATION PLAN**

**HYDROLOGIC INFORMATION**

Regulatory Reference: 30 CFR Sec. 773.17, 774.13, 784.14, 784.16, 784.29, 817.41, 817.42, 817.43, 817.45, 817.49, 817.56, 817.57; R645-300-140, -300-141, -300-142, -300-143, -300-144, -300-145, -300-146, -300-147, -300-148, -301-512, -301-514, -301-521, -301-531, -301-532, -301-533, -301-536, -301-542, -301-720, -301-731, -301-732, -301-733, -301-742, -301-743, -301-750, -301-761, -301-764.

**Analysis:**

**General**

The application meets the Operational Plan regulations for General Hydrologic Requirements as provided in R645-301-731. Plate 5-2 (Surface Facilities) depicts the location of the proposed disturbed area expansion. Plates 5-3(7), 5-3(8) and 5-3(9) (Surface Facility Cross Sections) depict the cross sections of the Dugout surface facility within the proposed disturbed area as well as outside the proposed expansion zone.

The proposed expansion of the disturbed area is contained within the approved Permit area. As such, the existing drainage system will convey and treat the storm water runoff generated from the newly disturbed area. Due to the small area of newly proposed disturbance, revisions and/or changes to the drainage system are unnecessary at this time.

The excavated topsoil (estimated at approximately 1,200 cubic yards) will be transported to the Soldier Canyon storage area.

**Findings:**

The information provided meets the hydrology requirements for Hydrologic Reclamation Plan as provided in the R645-State of Utah Coal Mining Rules.

**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 application does not meet the Operational Plan requirements for Mining Facilities Maps as provided in R645-301-731. Upon comparing the submitted Plate 5-2 (Surface Facilities) with the approved MRP Plate 5-2, the location and relative size of the proposed disturbed area expansion is apparent. However, there are numerous maps depicting the disturbed area within the MRP. As such, the Permittee should clarify within the narrative of the MRP that Plate 5-2 depicts the official disturbed area boundary. Additionally, Plate 5-2 should contain a note with similar language indicating the depicted disturbed area boundary is the mine's official representation.

Furthermore, Plates 5-5 (Reclamation Topography) and Plate 5-6 (Reclamation Cross Sections) should be updated to reflect the additional disturbed area.

**Findings:**

The information provided does not meet the hydrology requirements for Mining Facilities as provided in the R645-State of Utah Coal Mining Rules. The following deficiencies should be addressed:

**R645-301-731**, The Permittee should provide clarification within the narrative on page 5-12 as to how Plate 5-2 (Surface Facilities) depicts the mine's official representation of the disturbed area boundary. For clarification, the same language, along with a reference to Page 5-12, should be included on Plate 5-2 as a note.

**R645-301-521.141**, The Permittee should update Plates 5-5 (Reclamation Topography) and Plate 5-6 (Reclamation Cross Sections) to reflect the additional disturbed area proposed by this amendment.

**RECOMMENDATIONS:**

The hydrologic information provided in the application does not meet the requirements of the State of Utah R645-Coal Mining Rules. The proposed amendment should not be approved at this time.