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DIVISION OF OIL, GAS AND MINING

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January 27, 1999

TO: File

THRU: Joe Helfrich, Permit Supervisor, Compliance

THRU: Daron Haddock, Permit Supervisor, Permitting

FROM: Peter Hess, Reclamation Specialist III

RE: West Ridge PAP, Round 3, West Ridge Resources, Inc., West Ridge Mine, PRO/007/041, Folder #2, Carbon County, Utah

SUMMARY:

The Round 3 response to the Round 2 deficiencies was received in the SLO on January 11, 1999. This review will address the responses submitted as a result of the Round 2 deficiencies, as they relate to the R645 requirements relative to engineering.

TECHNICAL ANALYSIS:

OPERATION PLAN

R645-301-526.200. Utility Installation and Support Facilities

RECLAMATION PLAN

R645-301-541.300. Retention of Surface Structures as Part of Approved Post Mining Land Use

Analysis:

The Round 3 deficiency response has generated numerous revised maps; all maps now show the incoming power line which will be owned and maintained by Utah Power and Light Company having a capacity of 46 KVA. Approximately 1200 feet of this line with its associated support structures will run inside the West Ridge Mine disturbed area perimeter. Upon reclamation of the site, the removal of the support structures and transmission line to the disturbed area perimeter will be accomplished as part of SMCRA's reclamation requirements.

The Round 2 deficiencies addressed the fact that there was no agreement in place which would allow West Ridge Resources the right to reclaim that portion of the Utah Power and Light transmission line which is within the West Ridge Mine disturbed area.

Appendix 5-5, Attachment 3 has been submitted by the applicant to address the aforementioned. The attachment consists of a letter from the utility to the applicant giving them the right to reclaim the power line down to the disturbed area perimeter. This will allow the recovery of the imported fill and the return of the drainage to its pre-mining configuration.

Findings:

The response to the deficiency aired in this section of Round 2 is adequate to meet the concerns of this reviewer. R645-301-541.300 has been adequately addressed.

OPERATION PLAN

Sediment Control Measures

R645-301-742. Snow Removal and On Site Storage Plan

Analysis:

The Round 3 response includes a revised Map 7-2, Mine Site Drainage Map. The revision shows numerous snow storage areas within the Mine site disturbed area perimeter. It is assumed that snow will be removed by regular blading and/or push-load/pickup-haul procedures.

There are no snow storage sites shown within the sediment pond (which is now a two cell arrangement) incisements. Some snow will probably end up in the ponds due to side cast plowing; should this amount become excessive, a compliance problem may occur. Virtually all other snow melt will report to the sediment ponds via inlet diversions.

Although the submitted snow removal plan is not excessive in detail, it does pin-point the storage areas to be utilized. If the areas are utilized, there should be no compliance issues with regard to the placement of snow in unauthorized areas.

Findings:

The applicant has effectively addressed the concerns regarding snow storage for the "C" Canyon area raised by this individual.

COAL MINE WASTE

Mine Development Waste

Regulatory Reference R645-301-528.340

Analysis:

The applicant's response to the deficiency aired in Round 2 has been addressed on page 5-35 of the PAP, (revision dated 01/04/99) under 528.320, Coal Mine Waste, and on page 5-45, R645-301-536. The applicant commits to placing any mine development waste generated at West Ridge which cannot be stored underground in a permitted site approved by the DOGM; the waste storage facility at the Wildcat Coal Loadout facility is the permitted area to be utilized.

Any mine development waste which is hauled to the surface at West Ridge Mine will be temporarily stored in two areas of the "C" Canyon disturbed area until 12 cubic yards has accumulated, or 180 days has passed. Page 5-35 mentions these locations which are depicted on Map 5-5, Surface Facility Map.

Section 528.320 requires that coal mine waste will meet the design criteria of R645-301-536. As the Wildcat storage facility is already permitted, these requirements have already been met. The PAP is discussing the final disposal of any mine development waste hauled from West Ridge to Wildcat, the requirements of R645-301-536.510 **must be addressed via an amendment to the Wildcat permit, ACT/007/033 before any material can be hauled from the West Ridge permit area to the Wildcat Loadout.**

Findings:

The West Ridge PAP has met the minimum regulatory requirements for placing any mine development waste generated off the permit area; the permit for the receiving area must be amended before any material can be shipped.

SUBSIDENCE CONTROL

Regulatory Reference: R645-301-525.140. Monitoring

Analysis:

Page 5-18 of the PAP, as revised on 01/04/99, is now consistent with Page 3-9 with regard to its commitment to replace water in the West Ridge area if the water loss is determined to have been caused by mining. The PAP is consistent and the commitment meets the requirements of R645-301-525.231.

Findings:

The revised commitment to replace water quantities which are affected by mining meets the intent of R645-301-525.231. The minimum regulatory requirements for the mitigation of mining induced losses have been met.

MAPS, PLANS, AND CROSS SECTIONS OF RESOURCE INFORMATION

Regulatory References: 30 CFR Sec. 784.23.
R645-301-512. Affected Area Maps
R645-301-521. Mining Facilities Maps
R645-301-542. Mine Workings Maps
R645-301-632. Subsidence Monitoring Maps
R645-301-731. Monitoring and Sample Location Maps
R645-302-323. Special Categories in Areas of Mining

Analysis:

The permittee has changed all of the maps which were submitted as part of the PAP; however, the majority of the changes are considered minor from an engineering perspective. The changes include the following:

1) A change of logotype from Andalex Resources, Inc., to West Ridge Resources, Inc.

2) A reduction of the mine site disturbed area which reflects the down sizing of the sediment pond(s) from a three-cell series arrangement to a two-cell sediment control facility.

3) Also regarding a reduction of disturbed area, the permittee has indicated that the upper sections of the left and right forks of "C" Canyon may not be extended to what was originally shown on previous maps. These reductions are considered to be a benefit.

4) The permittee has added an additional conveyor support structure in the mine yard for the ROM belt. This, plus the relocation of an in yard road has created a reduction in the cuts and fills. The permittee has defined "CGM", (colluvial growth medium).

The following were reviewed as relative to the engineering portion of the R645 rules; Maps 1-1, 2-5, 5-1, 5-2, 5-3, 5-4A, 5-4B, 5-6, 5-6A, 5-6B, 5-6C, 5-7, 5-8, 5-9, 5-10, 5-11, 5-12, 7-5, 7-6, 7-7. No problems were noted with any of the maps.

Map 5-5, Surface Facility Map is still under revision by the permittee, and will be reviewed upon submittal.

Findings:

The revised maps which have been submitted as part of the PAP are considered adequate to meet the minimum regulatory requirements for affected area maps, mine workings maps, and monitoring and sample location maps.

Map 5-5, Surface Facility Map is under revision by the permittee and will be reviewed upon submittal. Upon completion of the review, the adequacy of that map will be determined as it relates to the minimum regulatory requirements for mining facility maps.

SIGNS AND MARKERS

Regulatory Reference: 30 CFR Sec. 817.11; R645-301-521.

Analysis:

R645-301-521.200. Signs and Markers Specifications

The 01/04/99 revision of page 5-9, 521.200 adequately addresses the specification requirements which must be met with regard to the signs and markers which must be posted at a permitted site. This minimum regulatory requirement has been met.

Findings:

The PAP meets the minimum regulatory requirements for Signs and Markers at a permitted mine site.

RECLAMATION PLAN

Regulatory Reference: R645-301-540.

Analysis:

R645-301-541.400. Requirement to Submit a Reclamation Plan for Lands Affected by Mining

The revision dated 01/04/99, page 5-46, paragraph two under 541.400 commits the permittee to mitigate all mining related induced impacts within the permit area as soon as possible upon discovery of those impacts. This commitment meets the minimum regulatory

requirements of R645-301-540.

Findings:

The PAP meets the minimum regulatory requirements of R645-301-541.400.

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