



State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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August 27, 1999

TO: File

THRU: Daron Haddock, Permit Supervisor *NOE 21*

FROM: Robert Davidson, Soils Reclamation Specialist *RAD*
Paul Baker, Reclamation Specialist *NOE 21 for Paul Baker*

RE: Side Casting Amendment (N99-46-1-1), West Ridge Resources, Inc., West Ridge Mine, ACT/007/041-99C, Folder #2, Carbon County, Utah

SUMMARY:

The first Permit Application Package (PAP) submittal for the West Ridge mine was received on January 26, 1998. The Division completed and replied with their initial Technical Analysis response on August 20, 1998. West Ridge Resources resubmitted the PAP on October 7, 1998, and the Division responded with a Technical Analysis on November 27, 1998. A third submittal was received on January 11, 1999. The Division responded with memos from each of the review team disciplines on January 27, 1999. A fourth submittal was received on February 1, 1999 in response. The Division of Oil, Gas and Mining approved the Permit Application Package and issued the Permit on April 1, 1999. The Regional Director, United States Department of the Interior, Office of Surface Mining, approved the Experimental Practice for in-place topsoil protection on March 10, 1999. Federal Mine Plan approval was given on June 30, 1999.

During site construction of the nose pad and nose-pad access road, the lower portion of the access road outslope received side cast material. Side casting material over the outslope of the nose pad access road directly contradicts Appendix 5-5, page 28, paragraph 2 of the mining and reclamation plan, which explicitly states that no side casting would occur. This action resulted in a Notice of Violation N99-46-1-1 with an abatement requiring amending the Mine Reclamation Plan (MRP). The current amendment contains the proposed changes to the approved MRP for abatement of N99-46-1-1.

TECHNICAL ANALYSIS:

OPERATION PLAN

TOPSOIL AND SUBSOIL

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

Analysis:

Map 2-5, Cut/Fill Map, of the approved plan indicates that the outslope of the nose pad access road were to remain undisturbed. Side casting material over the outslope of the nose pad access road directly contradicts commitments stated in Appendix 5-5, page 28, paragraph 2 of the Mining and Reclamation Plan (MRP), which states that the nose pad and access road would be constructed in a manner that avoids side casting material. The purpose of eliminating side cast and large cuts was to minimize disturbance on this south-southeast exposure where the Division felt reclamation would be difficult. By not disturbing this area, final reclamation potential would be enhanced on this slope. Original construction plans contemplated using this area for the mine portals; however, West Ridge changed the plans for the portals to the east side of the canyon. Side casting material and cutting the south-southeast slope negated the desired result from moving the portals away from the south-southeast slope to the opposite side of the canyon. Therefore, as a result of not following the approved plan, side casting and side cutting the south-southeast slope below the nose-pad access road has actually increased overall site disturbance because now West Ridge created an additional major area of side cast and extensive cuts (approximately 0.4 acres) that could have served as the high wall area. There is no damage outside the disturbed area as a result of this action. Final reclamation and vegetation establishment on this south-southeast slope will likely be difficult.

After removing the side cast material, the resulting 1:1 side cut hillside slope will be seeded with the interim re-vegetation seed mix. Although vegetation was removed, the slope below the upper portion of the nose cut access road that was not side cast nor cut, will not be seeded. Final reclamation of the cut slope area will proceed as described in the MRP for slope-rock-cut (S/R/C). Description of reclamation for S/R/C is covered in Appendix 5-5, Part II, 4(d). Map 2-5, Cut/Fill Map, was updated to show the resulting cut slope below the access road.

Findings:

Information provided is considered adequate to meet the requirements of this section.