



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

Michael O. Leavitt
Governor
Kathleen Clarke
Executive Director
Lowell P. Braxton
Division Director

1594 West North Temple, Suite 1210
PO Box 145801
Salt Lake City, Utah 84114-5801
801-538-5340
801-359-3940 (Fax)
801-538-7223 (TDD)

March 22, 2000

TO: Internal File
THRU: Pete Hess, Project Team Lead *SM for PHH*
FROM: Paul Baker, Reclamation Biologist *PB*
RE: West Ridge Highwall As-Built, West Ridge Resources, West Ridge Mine.
ACT/007/041-AM00B

SUMMARY:

On February 16, 2000, West Ridge Resources submitted as-built drawings of the surface facilities and the sedimentation ponds. This was done primarily in response to Division concerns that the highwall was larger than shown in the approved mining and reclamation plan.

The Division is concerned about the effects of the enlarged highwall on the reclamation plan. West Ridge has not demonstrated the highwall can be reclaimed to the premining slope, and if the highwall cannot be returned to the original slope, the experimental practice will be adversely affected.

TECHNICAL ANALYSIS:

EXPERIMENTAL PRACTICES MINING

Regulatory Reference: 30 CFR Sec. 785.13; R645-302-210, -302-211, -302-212, -302-213, -302-214, -302-215, -302-216, -302-217, -302-218.

Analysis:

The permit for the West Ridge Mine includes provisions for an experimental practice where topsoil was preserved in place rather than being salvaged. The Office of Surface Mining, Reclamation and Enforcement and the Division approved this practice believing it would offer at

least as much environmental protection as traditional soil salvage. The mining and reclamation plan included very specific steps needed for this practice to succeed.

In the bottom of C Canyon, soil was left in place rather than being salvaged prior to mining. This soil was covered either with geotextile or with strips of flagging to mark it. Next, fill was placed on top of the soil, and the mine facilities are being built on top of the fill.

Soil was salvaged and stockpiled from the areas where it was necessary to cut the slopes. In the approved mining and reclamation plan, the permittee demonstrated these cuts could be reclaimed to the same contour existing prior to mining. This was necessary because if the slopes had to be less steep, they would cover the soil in the experimental practice area.

Because the highwall is higher than shown in the existing mining and reclamation plan, it is now uncertain whether it can be reclaimed to the original contour while maintaining a stable slope. If the slope has to be less steep, it would cover part of the experimental practice area where topsoil is buried, and this could not be allowed.

The permittee needs to provide revised reclamation plans addressing highwall reclamation in light of the experimental practice. In addition, Stipulation 1 in Attachment A of the permit requires that West Ridge Resources conduct an annual evaluation of the effectiveness of the experimental practice. The Division is also required to conduct an annual review of the practice to ensure that it fully protects the environment and public health and safety. Since the permit was approved April 1, 1999, the first of these evaluations by both the permittee and the Division should be in preparation. It would be appropriate for the permittee to submit this information with as-built drawings. In the event that the experimental practice is determined to be not as environmentally protective as would otherwise be required by standards promulgated under R645-301 and R645-302, revised reclamation plans which utilize standard reclamation technology will be required.

Findings:

Information provided in the proposal is not adequate to meet the requirements of this section of the regulations. Prior to final approval, the permittee must supply the following in accordance with:

- R645-302-210**, The permittee needs to provide a reclamation plan for the highwall showing how soils in the experimental practice area will still be protected.

R645-302-216, The permittee is required in the permit to conduct an annual evaluation of the effectiveness of the experimental practice. This evaluation is due April 1, 1999, but could be submitted with the required revised reclamation designs.

In addition to the evaluation of the experimental practice done by the permittee, the Division is also required to conduct an annual review to ensure that it fully protects the environment and public health and safety. The Division should review the analysis presented by the permittee.

RECOMMENDATIONS:

The as-built drawings should not be approved. West Ridge Resources needs to provide revised reclamation designs showing how the highwall can be reclaimed and soils in the experimental practice area preserved. In addition, both West Ridge and the Division need to conduct an evaluation of the effectiveness of the experimental practice.

If significant alterations to the experimental practice become necessary, they would be subject to the notice, hearing, and public participation requirements of R645-300-120 and concurrence by the Office of Surface Mining, Reclamation and Enforcement.