



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

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December 12, 2000

TO: [REDACTED]

FROM: Paul B. Baker, Reclamation Biologist and Project Team Lead

RE: Experimental Practice Evaluation, West Ridge Resources, Inc., West Ridge Mine,
[REDACTED] AM00F-1

SUMMARY:

On September 1, 2000, the Division received the evaluation of the experimental practice at the West Ridge Mine. This evaluation is required by permit stipulation to be done annually. The Division responded with a technical analysis on October 23, 2000, and West Ridge Resources responded on December 6, 2000.

In addition to the evaluation of the experimental practice, the proposal includes a plan to sample fill material for acid-forming potential. This resulted from the Division's evaluation of the experimental practice and its concern that soils buried under the fill could be contaminated by acid-producing materials.

TECHNICAL ANALYSIS:

**REQUIREMENTS FOR PERMITS FOR SPECIAL
CATEGORIES OF MINING**

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:

By permit stipulation, the applicant is required to conduct an annual evaluation of the

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experimental practice at the West Ridge Mine. Basically, this practice entails not salvaging topsoil from part of the disturbed area. Instead, the soil was covered with geotextile which was then covered with fill. In areas where the soil was classified as rock outcrop/rubbleland, it was covered with marker strips before the fill was put over the top.

Both the Division and the operator felt this construction plan, if properly implemented, would result in improved reclamation success. The channel would remain essentially intact, and rocks on the soil surface would still be present at the time of reclamation.

On August 4, 2000, the Division wrote to the applicant with several questions it felt should be answered as part of the experimental practice evaluation. The Division considers the evaluation for the first year to be particularly important for judging whether the practice will be successful.

The experimental practice evaluation portion of the amendment proposal consists of answers to the Division's questions and includes comments a Division representative made after viewing several photographs of the construction sequence. As far as the Division is aware, this information in the application is complete and accurate.

In its annual evaluation of the experimental practice, the Division expressed concern about the potential for acid leachate adversely affecting soils buried under the pad. The applicant was required to submit an annual monitoring plan to detect the potential for acid formation. According to the proposal, samples will be taken at depths of three to six inches from three locations shown on revised Plate 2-2. These samples will be analyzed for acid and toxic forming potential per Division guidelines unless roof and floor samples do not indicate any toxicity problems. If no toxicity problems are found in the roof and floor samples, the soil samples will only be analyzed for acid/base potential.

This plan is adequate. The Division does not anticipate toxicity problems in the coal, but there could be problems with acid leachate that might adversely affect the growth medium. The sampling program should detect if this will be a problem.

Findings:

Information in the proposal is adequate to meet the requirements of this section of the regulations.

RECOMMENDATIONS:

The application meets regulatory requirements and can be approved. The applicant should be aware that the next evaluation of the experimental practice is due April 1, 2001.