



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

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November 14, 2001

TO: Internal Files
THRU: Karl R. Housekeeper, Reclamation Specialist, Team Lead *KRH*
FROM: Gregg A. Galecki, Reclamation Specialist *GA*
RE: Midterm Review, West Ridge Resources, Inc., West Ridge Mine, C/007/041-MT01, Carbon County, Utah

SUMMARY:

Elements selected for review during the Midterm were outlined in the Division's letter to West Ridge Resources, Inc. on October 4, 2001. Item #3 is discussed in this memo. The elements reviewed include ensuring that the Plan contains commitments for application of the best technology currently available (BTCA) to prevent additional contributions of suspended solids to stream flows outside of the permit area. A review of the Plan was conducted in conjunction with a technical site visit on November 8, 2001.

TECHNICAL ANALYSIS:

OPERATION PLAN

HYDROLOGIC INFORMATION

Regulatory Reference: 30 CFR 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:

TECHNICAL MEMO

Sediment Control Measures

The existing plan primarily provides sediment control through the use of silt fences, straw bales, sedimentation ponds, and ASCA's for the BTCA treatment of disturbed areas. All silt fences viewed were maintained and in good working order.

ASCAs X, Y, and Z were inspected in the field and determined to be providing adequate sedimentation control. ASCA X, the Test Plot, was well vegetated and a well-maintained silt fence prohibited any sediment from entering the stream. ASCA Y is actually being used as a coal storage area, with drainage reporting to the Sedimentation Ponds. A berm separates the coal storage area from the undisturbed drainage. The side of the berm reporting to undisturbed culvert UC-HH is riprapped and is showing no signs of erosion. ASCA Z is functioning satisfactorily. The outslope where water discharges into the creek (UC-PP) is well armored with riprap and no sediment accumulation is evident. Silt fences downstream also show no sign of sediment accumulation. It was noted, however, that Mine Site Drainage Map 7-2 does not accurately reflect the drainage configuration from ASCA Z. Map 7-2 in both the currently approved plan (dated 06/06/2000) and the Division Order (dated 07/02/2001) illustrate an oil/grease catch box and berm that apparently do not exist in the field.

Sedimentation Ponds

Sediment pond A was holding water and pond B was dry, in good working order, and appeared empty. No discharges have been reported from any of the DMRs for the West Ridge Sedimentation Ponds. The permit commits to having 60 percent clean-out markers in both ponds that were not present during the site visit. This commitment is supported by Maps 7-4, 7-4A, and verbally on page 7-34 of the permit. Stakes/markers are valuable so that a visual determination of the pond volume can be assessed during inspections.

Findings:

During the technical site visit, the Operator committed to installing a precipitation gauge, and reporting its activity on an annual basis. This commitment adds valuable information to the hydrologic and climatic monitoring. It also provides valuable storm-event information for determining compliance.

The precipitation gauge was installed and functioning on the 11/14/2001 inspection. The operator committed at that time to install the 60% sediment markers into both cells of the sediment pond as agreed to in the approved MRP.

No failure of BTCA off the permit area was noted during the site inspection.

RECOMMENDATIONS:

The precipitation gauge and the 60 percent sediment level markers need to be installed on site and the operator committed to perform this installation.