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

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OK

February 24, 2003

Gary E. Gray, Resident Agent  
West Ridge Resources, Inc.  
P.O. Box 1077  
Price, Utah 84501

Re: Conditional Approval of Abatement to N02-49-2-1 (Mine Water), West Ridge Resources, Inc., West Ridge Mine, C/007/041-AM03A-1, Outgoing File

Dear Mr. Gray:

The above-referenced amendment is conditionally approved upon receipt of five clean copies prepared for incorporation. Please submit these copies by March 20, 2003. Once we receive these copies, final approval will be granted, at which time you may proceed with your plans.

A stamped incorporated copy of the approved plans will also be returned to you at that time, for insertion into your copy of the Mining and Reclamation Plan. A copy of our Technical Analysis is enclosed.

If you have any questions, please call me at (801) 538-5268 or Gregg at (801) 538-5260.

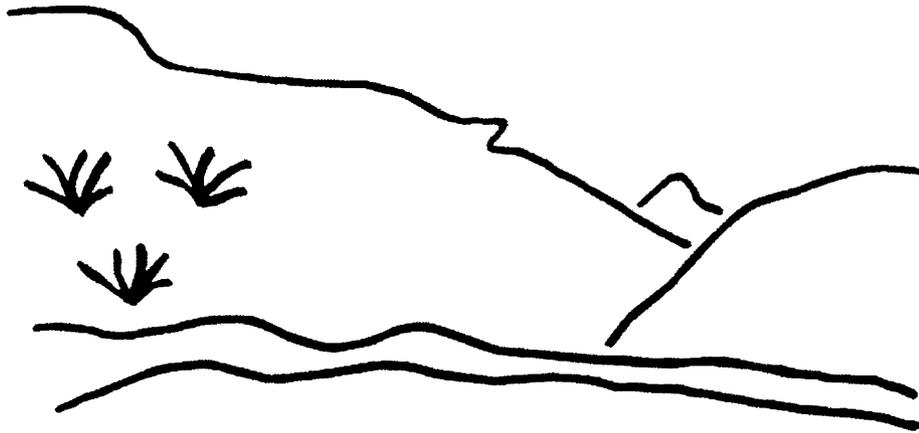
Sincerely,

A handwritten signature in black ink, appearing to read "Pamela Grubaugh-Littig".

Pamela Grubaugh-Littig  
Permit Supervisor

an  
Enclosure  
cc: Price Field Office  
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# State of Utah



## Utah Oil Gas and Mining

### Coal Regulatory Program

West Ridge Mine  
Abatement to N02-49-2-1 (Mine Water)  
C/007/041-AM03-1  
Technical Analysis  
February 19, 2003

TECHNICAL ANALYSIS

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## TECHNICAL ANALYSIS

The Division ensures compliance with the Surface Mining Control and Reclamation Act of 1977 (SMCRA). When mines submit a Permit Application Package or an amendment to their Mining and Reclamation Plan, the Division reviews the proposal for conformance to the R645-Coal Mining Rules. This Technical Analysis is such a review. Regardless of these analyses, the permittee must comply with the minimum regulatory requirements as established by SMCRA.

Readers of this document must be aware that the regulatory requirements are included by reference. A complete and current copy of these regulations and a copy of the Technical Analysis and Findings Review Guide can be found at <http://ogm.utah.gov/coal>

This Technical Analysis (TA) is written as part of the permit review process. It documents the Findings that the Division has made to date regarding the application for a permit and is the basis for permitting decisions with regard to the application. The TA is broken down into logical section headings which comprise the necessary components of an application. Each section is analyzed and specific findings are then provided which indicate whether or not the application is in compliance with the requirements.

Often the first technical review of an application finds that the application contains some deficiencies. The deficiencies are discussed in the body of the TA and are identified by a regulatory reference which describes the minimum requirements. In this Technical Analysis we have summarized the deficiencies at the beginning of the document to aid in responding to them. Once all of the deficiencies have been adequately addressed, the TA will be considered final for the permitting action.

It may be that not every topic or regulatory requirement is discussed in this version of the TA. Generally only those sections are analyzed that pertain to a particular permitting action. TA's may have been completed previously and the revised information has not altered the original findings. Those sections that are not discussed in this document are generally considered to be in compliance.

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**TECHNICAL ANALYSIS**

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INTRODUCTION

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## INTRODUCTION

The following technical memo is a review of information submitted by West Ridge Resources, Inc. (Operator) to the Division of Oil, Gas, and Mining (Division) on February 18, 2003. This data is supplemental to data submitted on January 17, and January 28, 2003, to amend Appendix 7-4, the Sedimentation and Drainage Control Plan. The proposed modifications were submitted as a proposed abatement response to Notice of Violation (NOV) N02-49-2-1. NOV N02-49-2-1 was serviced November 19, 2002, by Inspector Karl R. Housekeeper in response to the Operator diverting mine-water through disturbed-area culverts and ditches, and storing mine-water in the Sedimentation pond. The current Utah Pollutant Discharge Elimination System (UPDES) permit indicates outfall number 001 is for discharge of the Sedimentation Pond that drains the disturbed area and associated facilities area. Outfall number 002 is for discharge of mine-water directly to the C Canyon drainage/Grassy Trail Creek. The review is solely from a hydrologic prospective and addresses only the hydrologic regulations pertinent to the amendment. The additional modifications made to the chapter 7 and appendix 7-4 of the currently approved Mining and Reclamation Plan (MRP), adequately address the minimum requirements of the regulations. Incorporation of this amendment into the MRP is recommended.

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**INTRODUCTION**

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**GENERAL CONTENTS**

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## **GENERAL CONTENTS**

### **PERMIT APPLICATION FORMAT AND CONTENTS**

Regulatory Reference: 30 CFR 777.11; R645-301-120.

**Analysis:**

Spelling and pagination errors in Appendix 7-4 that were cited in the January submittal have been adequately addressed.

**Findings:**

Information in the proposal adequately address the requirements of the General Contents section of the regulations.

### **REPORTING OF TECHNICAL DATA**

Regulatory Reference: 30 CFR 777.13; R645-301-130.

**Analysis:**

The deficiencies cited in the January 17, 2003, submittal, were rectified with information submitted February 6, 2003. This information was part of an amendment to the M&RP that was approved in September 2002, but never submitted and officially incorporated into the Mine Plan. The exclusion of the information made a comprehensive review of the January 17, 2003 information very difficult. Primarily, all the tables and figures in Appendix 7-4 now reflect accurate 'as-built' information.

**Findings:**

Information in the proposal adequately addresses the requirements of the General Contents section of the regulations.

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**GENERAL CONTENTS**

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**ENVIRONMENTAL RESOURCE INFORMATION**

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**ENVIRONMENTAL RESOURCE INFORMATION**

Regulatory Reference: Pub. L 95-87 Sections 507(b), 508(a), and 516(b); 30 CFR 783., et. al.

**CLIMATOLOGICAL RESOURCE INFORMATION**

Regulatory Reference: 30 CFR 783.18; R645-301-724.

**Analysis:**

During the mine permit midterm review, conducted during the fall season 2001, the Operator committed to installing a precipitation gauge that would monitor precipitation events and would be submitted on an annual basis. A precipitation gauge was installed on November 14, 2001. At the time of this analysis, the precipitation data for 2001 and 2002 has not been submitted however, it is anticipated this information will be included in the 2002 annual report.

Depending on how accurate the precipitation information has been documented, the Division reserves the request to require the submittal of more information. This becomes more important with the current proposed amendment because UDPES Discharge Point 001 will now be conveying mine-water discharge, in addition to the disturbed area runoff, as was originally designed. The additional information may include the use of 'Best Technology Currently Available' (BTCA) and request a total-weather station be installed to record data continuously (models are available in the \$300 - \$700 range).

**Findings:**

Information in the proposal adequately meets the minimum requirements of the Environmental Resource Information – Climatological Resource Information section of the regulations.

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**ENVIRONMENTAL RESOURCE INFORMATION**

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**OPERATION PLAN**

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# **OPERATION PLAN**

## **HYDROLOGIC INFORMATION**

Regulatory Reference: 30 CFR Sec. 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:**

#### **Acid- and Toxic-Forming Materials and Underground Development Waste**

The MRP (pg 7-28) indicates 'any emulsion fluid spill underground would go to an underground sump'. This information is still valid because the Operator indicates small sumps exist at the end of each Main. These sumps are adequate for containment of spills should any occur. The Operator has also made a commitment of when a larger underground sump-area will be developed on page 1a of Appendix 7-4. This information adequately addresses an earlier-cited deficiency.

#### **Water-Quality Standards And Effluent Limitations**

The submittal of the currently proposed amendment affects the routing/process of the two UPDES Discharge Points within the currently approved permit. The current UPDES permit (expires April 2003) maintains the same water quality standards / effluent limits at both discharge points, and the Operator commits to maintaining those standards within this amendment.

#### **Sediment Control Measures**

As an added Sediment Control Measure the current amendment has been proposed. Recent testing of the mine-water discharge indicates the water may not always meet effluent limitations. The current amendment proposes routing mine-water discharge through the Sedimentation Pond. This routing is outlined in Section 1e) of the Sedimentation and Drainage Control Plan - Appendix 7-4. The following modifications have been made to the amendment for compliance:

- Pumping of water will be limited to a maximum rate of 230 gpm. This is the maximum flow-rate the smallest ditch can handle while still maintaining capacity for the 10-year/24-hour storm event and maintain ½-foot freeboard. These commitments are made in the Introduction Section of Appendix 7-4 and numerous other areas of the appendix.

- Both Map 7-2 and text clearly indicate how mine-water is conveyed from the mine portal to the UPDES 002 discharge point and sedimentation cell A.
- Culverts DC-8AR will only be used to convey water in excess of the designed 10-year/24-hour storm event. This is outlined in Appendix 7-4 Introduction item 1f.
- The commitment of the ditches 'maintaining a 0.5-foot of freeboard at all times' is stated in numerous places and is supported by Appendix 7-4 Table 13.

This information adequately addresses earlier-cited deficiencies in this section.

#### **Siltation Structures: Sedimentation Ponds**

In Section R645-301-742 – Sediment Control Measures of the MRP (page 40), the Operator commits to monitoring sediment levels with a marker in the pond and removing sediment at the 60 % volume level. The Operator also commits to monitor the water level with a marker and removing water at the 100% sediment volume level, commonly referred to as the 'dead storage' of the sedimentation pond.

#### **Discharge Structures**

Appendix 7-4 Table 15 – Disturbed Culvert Design Summary, indicates culvert DC-12 is a 1.5-foot culvert with a flow capacity of 21.59 cfs. The only additional water diverted to culvert DC-12 from culverts DC-8AR will be in excess of the designed 10-year/24-hour storm event. Ditch DD-12 and culvert DC-12 can handle the additional flow.

Appendix 7-4 Section 3.1g) indicates mine-water will utilize only the "dead" or sediment storage volume (100 % marker) of the Sediment Pond cells, at which point it will be discharged into the C Canyon drainage according to the UPDES Discharge Permit. A similar statement addressing the pumping of mine-water is to be provided in Appendix 7-4 Section 1e). Both of these sections also provide an adequate description of how the cells of the Sedimentation pond will be used for mine-water.

Section R645-301-733.130 – Impoundments (pg 7-34) indicates Cell B of the Sedimentation Pond will be supplied with a steel-constructed walkway to access the UPDES Discharge Point 001 (Principle Spillway – 36" C.M.P. culvert riser and oil skimmer). With the increased likelihood that both Cell A and Cell B of the Sedimentation Pond will be retaining water in the future, the Operator has committed to installing the walkway this spring once suitable weather exists.

#### **Findings:**

Information in the proposal adequately meets the minimum requirements of the Operation Plan – Hydrologic Information section of the regulations.

**OPERATION PLAN**

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**MAPS, PLANS, AND CROSS SECTIONS OF MINING OPERATIONS**

Regulatory Reference: 30 CFR Sec. 784.23; R645-301-512, -301-521, -301-542, -301-632, -301-731, -302-323.

**Analysis:**

**Mining Facilities Maps**

Map 7-2, Mine Site Drainage map, submitted January 28, 2003, and re-submitted February 10 with additional modifications. The map now clearly illustrates the location of UPDES discharge point 002 (mine-water discharge directly into the C Canyon drainage), and how mine-water is conveyed from the mine portal to Sedimentation Pond Cell A.

Also on Map 7-2, an area outlined with a copper-colored line, and extending up from the property gate, has been modified to illustrate the areas included in ASCA-W. These items adequately address previously cited deficiencies in this section.

**Findings:**

Information in the proposal adequately addresses the requirements of the Operation Plan – Maps, Plans, and Cross Sections of Mining Operations section of the regulations.

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