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# TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

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March 21, 2012

TO: Internal File *DCJ*

THRU: Ingrid Campbell, Lead *IC*

FROM: Steve Christensen, Environmental Scientist *SCC*

RE: Appendix 5-19 Temporary Re-Opening of B Canyon Portal, West Ridge Resources, Inc., West Ridge Mine, C/007/0041, Task ID #4010

## SUMMARY:

On February 22, 2012, the Utah Division of Oil Gas & Mining (the Division) received an amendment from West Ridge Resources, Inc. (the Permittee) to the Mining & Reclamation Plan (MRP) of the West Ridge Mine.

The Permittee seeks approval to re-open the B Canyon portal in order to perform safety related rehabilitation work in portions of the old Kaiser mine entries prior to longwall development in that area. The Permittee indicates that the work would be temporary with reclamation of the B Canyon Portals to be conducted within 6 months after re-opening them. The total disturbed area of the proposed work will be approximately 0.25 acres.

The amendment should not be approved at this time. The following deficiencies must be addressed prior to Division approval:

**R645-301-742:** The Permittee must provide additional information/clarification as to the sediment control measures to be implemented at the proposed project site. Plate #2 of 2 in Attachment 10 must be revised to clearly identify that excelsior logs will be utilized as the 'continuous sediment control' at the base of the temporary topsoil storage pile and directly adjacent to the B Canyon drainage.

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**TECHNICAL ANALYSIS:**

**GENERAL CONTENTS**

**LEGAL DESCRIPTION AND STATUS OF UNSUITABILITY CLAIMS**

Regulatory Reference: 30 CFR 778.16; 30 CFR 779.12(a); 30 CFR 779.24(a)(b)(c); R645-300-121.120; R645-301-112.800; R645-300-141; R645-301-115.

**Analysis:**

The amendment meets the Legal Description and Status of Unsuitability Claim requirements of the State of Utah R645-Coal Mining Rules.

In Section R645-301-114 of the amendment, the Permittee revises the disturbed acreage calculations. The additional 0.25 acres of disturbance associated with the project is added to the total disturbed acreage (31.24 acres total).

The B Canyon portal is located within Federal Lease SL-068754 (See Map 5-2, Surface Ownership Map). The legal description for Federal Lease SL-068754 is provided on page 1-8 of Chapter 1.

**Findings:**

The amendment meets the Legal Description and Status of Unsuitability Claim requirements of the State of Utah R645-Coal Mining Rules.

## ENVIRONMENTAL RESOURCE INFORMATION

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

## HYDROLOGIC RESOURCE INFORMATION

Regulatory Reference: 30 CFR Sec. 701.5, 784.14; R645-100-200, -301-724.

### Analysis:

#### Baseline Information

The B Canyon portal is located directly adjacent to the B Canyon drainage. Appendix 7-1 provides baseline information for the proposed project area (See Appendix 7-1, *Investigation of Surface-Water and Groundwater Systems in the West Ridge Area, Carbon County, Utah, January 19<sup>th</sup>, 1998, Mayo and Associates, LC*).

The information presented in Appendix 7-1 establishes the B Canyon drainage as ephemeral.

#### Probable Hydrologic Consequences Determination

The amendment meets the Probable Hydrologic Consequences Determination of the State of Utah R645-Coal Mining Rules.

As a result of the small amount of disturbance associated with this project (0.25 acres) and the temporary nature (6 months), the potential for hydrologic impacts to the ephemeral B Canyon drainage is considered minimal.

### Findings:

The amendment meets the Hydrologic Resource Information requirements of the State of Utah R645-Coal Mining Rules.

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## OPERATION PLAN

### ROAD SYSTEMS AND OTHER TRANSPORTATION FACILITIES

Regulatory Reference: 30 CFR Sec. 784.24, 817.150, 817.151; R645-301-521, -301-527, -301-534, -301-732.

#### Analysis:

##### Road Classification System

The amendment meets the Road Systems and Other Transportation Facility requirements of the State of Utah R645-Coal Mining Rules.

The proposed project will not require the construction of any roads. The existing B Canyon road will be utilized to access the proposed project site.

#### Findings:

The amendment meets the Road Systems and Other Transportation Facility requirements of the State of Utah R645-Coal Mining Rules.

## 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, -300-147, -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:

##### Diversions: General

The amendment meets the Diversion requirements of the State of Utah R645-Coal Mining Rules.

No diversions are proposed with the re-opening of the B Canyon portal.

##### Stream Buffer Zones

The amendment meets the Stream Buffer Zone requirements of the State of Utah R645-Coal Mining Rules.

The proposed project is located adjacent to the B Canyon drainage that has been characterized as ephemeral. No intermittent or perennial streams are located in the area of the proposed project.

### **Sediment Control Measures**

The amendment does not meet the Sediment Control Measures of the State of Utah R645-Coal Mining Rules.

The Permittee must provide additional information/clarification as to the sediment control measures to be implemented at the proposed project site. Plate #2 of 2 in Attachment 10 must be revised to clearly identify that excelsior logs will be utilized as the '*continuous sediment control*' at the base of the temporary topsoil storage pile and directly adjacent to the B Canyon drainage.

### **Findings:**

The amendment does not meet the Sediment Control Measures of the State of Utah R645-Coal Mining Rules.

**R645-301-742:** The Permittee must provide additional information/clarification as to the sediment control measures to be implemented at the proposed project site. Plate #2 of 2 in Attachment 10 must be revised to clearly identify that excelsior logs will be utilized as the '*continuous sediment control*' at the base of the temporary topsoil storage pile and directly adjacent to the B Canyon drainage.

## **RECLAMATION PLAN**

### **HYDROLOGIC INFORMATION**

Regulatory Reference: 30 CFR Sec. 784.14, 784.29, 817.41, 817.42, 817.43, 817.45, 817.49, 817.56, 817.57; R645-301-512, -301-513, -301-514, -301-515, -301-532, -301-533, -301-542, -301-723, -301-724, -301-725, -301-726, -301-728, -301-729, -301-731, -301-733, -301-742, -301-743, -301-750, -301-751, -301-760, -301-761.

### **Analysis:**

#### **Hydrologic Reclamation Plan**

The amendment meets the Hydrologic Reclamation Plan requirements of the State of Utah R645-Coal Mining Rules.

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On page 8 of Appendix 5-19, the Permittee discusses the reclamation plan following the termination of rehabilitation work underground. The site will be reclaimed to its approximate original contour, will be covered with the removed topsoil material and re-seeded. The Permittee further commits to installing an additional row of excelsior logs along the down-slope edge of the reclaimed area. Additionally, the excelsior logs will remain in place following reclamation until a determination has been made that the re-vegetation efforts will provide sufficient sediment control.

**Findings:**

The amendment meets the Hydrologic Reclamation Plan requirements of the State of Utah R645-Coal Mining Rules.

**RECOMMENDATIONS:**

The amendment should not be approved at this time. The aforementioned deficiency relative to sediment control measures must be addressed prior to final approval.