



Technical Analysis and Findings
Utah Coal Regulatory Program

February 23, 2017

PID: C0070041
TaskID: 5347
Mine Name: WEST RIDGE MINE
Title: MIDTERM COMPLETION RESPONSE

Summary

The following is a list of all amendments that have been recorded in CTS since the permit was issued 1/31/14
Task 5015 Citizen Complain
Task 4977 NOV #21156
Task 4905 Bond Sheet Corrections
Task 4904 Raptor Survey File Location
Task 4882 Ownership and Control
Task 4725 Certificate Location

Deficiencies Details:

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General Contents

Identification of Interest

Analysis:

Chapter 1, Section 112 contains the Identification of Interests for the West Ridge Mine. West Ridge Resources, Inc is the operator.
Ownership and Control (Appendix 1-7) was updated and incorporated into the approved MRP 4/27/15.

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Violation Information

Analysis:

The MRP meets the State of Utah R645 requirements for Violation Information.
The Applicant/Violator System was queried on 11/29/16. Results displayed 3 outstanding violations. One Cessation Order

(Permit 32940105, PA) One Notice of Violation (Permit 32940105, PA) and one State Civil Penalty (Permit U00383, WV). The Division requested additional information from OSM and all violations are at "conditional," indicating a settlement, payment plan, or pending challenge. Linking entities are Fifth Third Bank of NE Ohio Trustee (Murray 2003 Trust), etc. On 1/9/17, a second permit evaluation was queried and only State Civil Penalty for Permit U00383 remained. West Ridge Resources provided the conference findings for this violation and adequately demonstrated the violation has been resolved.

A listing of violations received by the applicant in connection with any coal mining and reclamation operation during the three year period preceding the application date is provided in Appendix 1-2.

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Right of Entry

Analysis:

The MRP meets the State of Utah R645 requirements for Right of Entry.

Right of Entry information is proved in Ch. 1, tables 1-1 through 1-3. There have been no lease relinquishments since the permit was renewed 4/1/14.

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Permit Term

Analysis:

The MRP meets the State of Utah R645 requirements for providing a permit term.

The permit term as outlined in Section 116.100 has been updated to show mining longwall mining ceased in 2015 and pillar mining will begin in July 2018 and be complete by July 2019. Facilities are planned for removal in winter/spring 2020 with regrading and revegetation in the fall/winter 2020.

The asterisk indicates the mine is pursuing the acquisition of adjacent state and federal coal reserves.

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Environmental Resource Information

Fish and Wildlife Resource Information

Analysis:

The MRP meets the State of Utah R645 requirements for providing a Fish and Wildlife Resource information.

On 4/17/15 the Permittee submitted an amendment to replace the cover sheet to 3-2 with a new cover sheet to indicate the location of the confidential Raptor Surveys.

Ireinhart

Operation Plan

Fish and Wildlife Protection and Enhancement Plan

Analysis:

The MRP meets the State of Utah R645 requirements for providing Fish and Wildlife Protection and Enhancement.

Chapter 3, Page 3-8 & 3-9 requires locations within the permit area that contain potential raptor nesting habitat will be surveyed in the field within one year of any proposed mining activity that could result in subsidence. Should any nests be found, West Ridge Resources, Inc. would consult with the Division (DOGM), the Division of Wildlife Resources and the US Fish and Wildlife Service.

Raptor surveys were performed and the report was submitted as required for 2015. Two active Golden Eagle nests were located and successfully hatched chicks.

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Hydrologic Water Quality Standards

Analysis:

The amendment meets the State of Utah R645 requirements for Hydrologic Water Quality Standards.

The previous technical analysis identified a deficiency relative to the West Ridge Mine's Utah Pollutant Discharge Elimination System (UPDES) permit. Appendix 7-10 of the approved MRP contains a copy of UPDES permit #UTU0025640. The permit expired on April 30th, 2016. The previous deficiency directed the Permittee to replace the old UPDES permit with the up to date permit. However, the Division of Water Quality (DWQ) has not yet approved/issued the new permit. DWQ staff has indicated that until the permit revision has been finalized, the Permittee operates under the old permit (i.e. the one that expired on April 30th, 2016). As such, the Permittee remains in compliance with the Clean Water Act and UPDES permit.

At such time as the new UPDES permit is issued by DWQ, the Permittee can then up date the MRP at an appropriate time. Until then, routine Division inspections will serve to verify that the Permittee's UPDES permit is up to date.

schriste

Reclamation Plan

Topsoil and Subsoil

Analysis:

Analysis:

The Mining and Reclamation Plan does not meet the soils performance standards, R645-301-250.

CATCH BASINS:

The MRP Appendix 5-15, p. 14 states that Catchment A will be reclaimed when no longer needed with the same seed mix, but catch basin A was reclaimed in October 2016 (communication between S. Christensen and K. Madsen on 2/12/2017).

MRP Vol. 2, Appendix 5-15, Attachment 9, (p. 14) states that Catchment structures B, D, and F were never constructed. Catchment structures C and E were fully reclaimed in the fall 2009.

BEAR CANYON:

The cover letter attached to this Task 5347, dated January 17, 2017, states that the status of the Bear Cyn Gob Vent Hole (Appendix 5-14) has not changed. Appendix 5-14, page 13 states that the operation of the GVH facilities is expected to continue through temporary cessation for the life of the West Ridge Mine. It will be reclaimed at th same time as the minesite surface facilities in C Canyon.

B CANYON:

The current status of the B Cyn portal reclamation is described in Appendix 5-19 and in mid-term inspection report 5661, dated October 11, 2016.

Deficiencies Details:

The Mining and Reclamation Plan does not meet the soils performance standards.

In accordance with R645-301-250, Appendix 5-15 p. 14, must state that Catch Basin A was reclaimed in October 2016.

pburton

Revegetation Standards for Success

Analysis:

The MRP meet the State of Utah R645 requirements for providing reference areas to be used to measure reclamation success.

West Ridge Mine has three Division approved reference areas that are delineated on MRP Map 3-1 as required under R645-301-323.100. These reference areas represent Douglas fir/maple, Pinyon/juniper, and Douglas fir/Rocky Mountain/juniper communities. On May 19, 2016, the Division physically inspected each reference area. The pinyon/juniper and

Douglas-fir/Rocky Mountain/ juniper areas were in the same vegetative condition as those approved in the MRP. However, the Douglas fir/Maple site appeared to have been impacted from adjacent boulder fallout which had altered ground cover, production, and woody species density at that precise location. As such, the Division requested the Permittee relocate the Douglas fir/Maple reference site to another appropriate location that meets the Divisions regulatory requirements. As such, the Permittee had the consultant, Mt. Nebo Scientific, inspect the site and it was then found that the Division had not been to the actual reference site and the Douglas fir/Maple reference site was indeed still a viable reference site. The Permittee has submitted a report of these findings with the mid-term. See Vegetation Reference Areas at the West Ridge Mine 2016 This report also provides GPS coordinates to facilitate future inspections to ensure the correct location is examined.

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Bonding Determination of Amount

Analysis:

The midterm review of the amendment to update the MRP is deficient and does not meet the minimum requirements of R645-301-830 due to missing and incorrect information. Permittee must submit corrected and complete bonding sheets with support documentation.

Deficiencies Details:

The midterm review of the amendment to update the MRP is deficient and does not meet the minimum requirements of R645-301-830 due to missing and incorrect information. Please submit correct and complete bonding sheets with support documentation. Including the following.

1. Red line any changes from the previous approved MRP so it is easier to identify the difference.
2. Please include 3 current (2016) bids for the following or any other cost that need bids: City Sanitation Price county
Reveg002
Reveg001
JennChem - Seal Portal
Nielson Construction - haul
WestRidge007411
WestRidge007412
WestRidge007413
WestRidge007414
WestRidge007416
WestRidge007417
Nature Hill -Doug Fir Transplant
JennChem-Labor
Nielson Construction Plug well
All sheets need to have all references (RS Mean and sources) Referenced on each line item.
4. I also found quite a few calculation for (Cubic Feet) and CY (Cubic Yard) and swell factor errors throughout the Demo Workbook that need to be corrected and updated. Swell factor times CF = CF with swell factor. $CY = CF / 27$. When and if swell factor is included in the CY then formula for Cubic yard is Cubic Foot times swell factor divided by 27 = CY. Example: sheet named Shop Warehouse 01 had Length = 160, Width = 60, Height = 30 so $L \times W \times H = 288000$ CF. CF with swell factor of 0.33 is 95040, and CY with swell factor is 3520, and CY without swell factor is 10667. Please update all calculations as needed.
5. I am Missing the B Canyon Portal Reclamation sheet. If something has changed indicate it with red lines and provide support documentation why the change was made.
6. The Escalation Factor for 2016 is 0.7 percent or .007. Please update the escalation factor to .007 for 5 years out to 2021.
7. Double check the subtotals and totals on each sheet to insure that they are calculating everything they should be. Make sure all line items are included or removed as needed. example DOGM bonding sheet -Reclaim Conveyor Stringers 10- has a City services with 59 CY. and it doesn't match West Ridge submitted sheets and I don't know why or if it is suppose to be there, are we missing a reclamation amount or is it an error that shouldn't be there? Please Identify each of the line items and calculations so all numbers and line items are correct and updated as needed. Provide support documents for any changes that are made.

bwiser

Special Categories

Experimental Practices Mining

Analysis:

The MRP meets the requirements of Experimental Practices Mining, R645-302-210.

A statement in Appendix 2-6 (p. 21) states that the experimental test plot monitoring commitment has been fulfilled after ten years of monitoring. Please refer to annual report reviews for the last ten years for Division reviews of this monitoring.

Separate from the above test plot monitoring, required annual monitoring of protected buried topsoil is found in Appendix 2-8 addendum. Analysis of this surface soil is still a commitment in the MRP. The cover letter dated January 17, 2017 that accompanies this task 5347 amendment states that while in temporary cessation, the roads are not being salted in the location of T1 or T3 and that alternative de-icing procedures will be investigated.

pburton