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United States Department of the Interior

OFFICE OF SURFACE MINING
Reclamation and Enforcement
POST OFFICE BLDG. RM. 270
1823 STOUT STREET
DENVER, COLORADO 80202

ACT/015/004

January 5, 1979

Mr. Ron Daniels
Staff Assistant
Division of Oil and Gas
Department of Natural Resources
1588 N. West Temple
Salt Lake City, Utah 84116



Dear Ron,

We have made an initial review of Swisher's Plan for the Huntington Canyon #4 Mine.

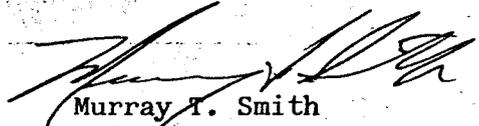
We must have more detailed plans before we can approve extending the mine into new Federal coal. Enclosed is a Draft list of the items we believe are necessary to add to the plan. These items refer to the mine and the mining area. For the C.V. Spur coal processing plant, we need a complete plan. The C.V. Spur should discuss existing conditions and proposed construction, operation, monitoring, pollution control and reclamation in just as much detail as the mine plan. Even though the attached comments do not refer to C.V. Spur, an acceptable plan for C.V. Spur would have to address each individual subject area in the comments as well as those included in the Swisher Mine Plan.

We are still in the process of developing our staff, procedures, and criteria for mine plan approvals. The procedures are probably going to change, but we are still aiming toward a workable, concurrent plan review with the States. At this time, several things have been made clear to us. First, we will not be able to make any approval unless we have a long term and complete plan for the whole operation. Approvals cannot be conditioned on submission of more data or plans at a later date, but must be made on a complete package. The plan must demonstrate that the whole operation complies with performance standards. In addition, it is becoming obvious that the hydrologic system must be evaluated in much greater detail than in the recent past. These points are being raised in the review of mine plans in all of the western states. Our list of additional information requirements reflects our position with respect to these concerns.

As we agreed, I have given a copy of this letter and the attachment to Swisher. We will be glad to meet with you and/or the company to discuss the points contained in this letter and to expedite approval of the mining plan. It is our

understanding that once we agree on what additional information is needed, you will give Swisher a formal request to furnish it.

Sincerely,

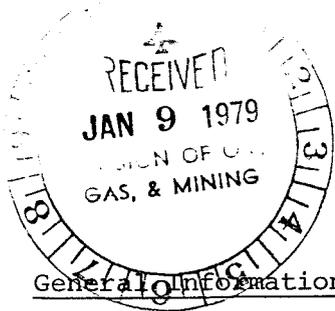


Murray T. Smith
Federal Lands Coordinator

Encl:

- cc: Clark Johnson, Fish and Wildlife Service, Salt Lake City, Utah
- Dan Guy, Swisher Coal Company
Forest Service, Price, Utah
- Jack Moffitt, Salt Lake City, Utah, USGS
- George Horn, Denver, Colorado, USGS

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HUNTINGTON CANYON #4 MINE

Additional Information Needed
For Federal Approval

General Information

1. Map of region showing cities, towns, transportation corridors, major surface drainages and all public roads.
2. Description of recreational, historical, conservation, archeological, and wildlife features in the region surrounding the mine area.
3. Description, and maps if necessary, showing wildlife, wildlife habitat and migration routes in the mine area, with special emphasis on big game and raptors. Include copies of any wildlife studies and rare and endangered species clearances.
4. Description, and maps if necessary, showing types, density, productivity, dominance and distribution of vegetation in the mine area.
5. Description, and maps if necessary, showing archeological features in the mine area. Include copies of any archeological studies or clearances.
6. Map showing roadless or wilderness study areas in the mine area.
7. Map, description, and design of any additional access roads, ventilation entry, portal areas, or other surface facilities needed over life of the mine.
8. More detailed description of final surface configuration of roads, ramps, face-up areas, etc., including cross sections.

Signs and Markers

1. Description of or sketch of sign design. Criteria for placement of identification and topsoil signs.

Land Use

1. Description of present land uses in mine area, including carrying capacities, condition of range, and management practices. Explain differences between stream valleys, steep slopes, flat hilltop areas, etc.
2. Description of how post-mining land use will be obtained.

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Disposal of Spoil and Waste Materials

1. Potential to degrade ground water by leaching, stability, and suitability for reclamation and revegetation should be evaluated for mine waste.
2. Specific designs for refuse and waste fills (certified by a registered professional engineer) should be presented.
3. Procedures for stripping of all vegetative organic material in the disposal area(s) and also for topsoil removal, segregation, and replacement should be supplied.
4. The methods of refuse and waste placement (so as to ensure mass stability, prevent mass movement, and provide suitable drainage control) should be described.
5. Final configuration of all fills should be given and compatibility with post-mining land uses should be demonstrated.
6. Inspection procedures for all fill should be specified.
7. An inventory of all springs, seeps, and water courses in the fill area(s) should be provided.
8. Foundation conditions for all fills should be supplied.

Water Quality

1. Due to the fact that the final location(s) of the sediment pond(s) at the mine site have yet to be determined, it cannot be assessed whether all surface drainage from the disturbed area passes through sediment pond(s). A more detailed drainage plan for the mine site should be submitted.

Surface Water Monitoring

1. With respect to the proposed surface water monitoring program, the following information should be provided:
 - a. The types of flow and sampling devices to be utilized and specific monitoring locations;
 - b. The type of analytical quality control system (including standard methods of analysis) to be utilized;
 - c. Types of reports and timing of reports to be submitted.
 - d. The following should be included in the water monitoring plan:

(1) Increased monitoring frequency to at least twice per month for sediment pond discharge and inflow, monitoring within 12 hours following a rainfall event (per EPA permit requirements), and for the first year of operation, intensively monitoring (e.g., on a daily basis) Mill Fork Creek during periods of high, normal, and low flow to characterize "likely diurnal and seasonal variation".

(2) Added parameters which historically have elevated levels in the mine area along Mill Fork Creek (e.g., TDS, and SO₄).

(3) An additional monitoring station on Mill Fork immediately upstream of slack basin which supplies water to the mine.

d. It should be noted that the EPA NPDES permit, which would cover discharges from Swisher's proposed sediment pond, specifies that waters will be discharged to Huntington Creek (not Mill Fork Creek). The permit will have to be amended.

Diversion and Conveyance of Overland Flow

1. Overland flow diversions in the mine site area should be clearly delineated on a detailed topographic map.
2. Diversions should be declared temporary or permanent. Restoration practices should be specified and justification for permanent diversions should be supplied.
3. Diversion designs (with standard cross-sections) should be provided, ability to safely pass design storms should be demonstrated, and sediment and discharge control measures should be specified.

Sedimentation Ponds

1. Finalized sediment pond location(s) should be specified and potential impacts of such ponds on Mill Fork Creek Valley should be evaluated. Effects of floods should be assessed. Alternative sediment pond locations should also be supplied.
2. Appropriate sediment storage volume should be taken into account in all sediment pond designs.
3. Drainage areas to be controlled by each sediment pond should be clearly delineated on a detailed topographic map.
4. Spillway and dewatering devices design specifications should be supplied.

5. A maintenance program for the removal of sediment should be spelled out.
6. Design information should be supplied (e.g., embankment height, width, and slopes) to demonstrate compliance with paragraphs (9) through (21) of 30 CFR 715.17(e).

Discharge Structures

1. Specifications for discharge control structures (e.g., energy dissipators) should be provided for sediment ponds and diversions.
2. Minimum flows from the cyclone water treatment system overflow to Mill Fork Creek should be specified.

Acid and Toxic Materials

1. The toxicity of the preparation plant refuse and mine waste should be evaluated and burial and treatment options (including placement on impermeable material) should be explored for the C.V. Spur area.
2. Disposal and drainage plans should be more clearly described.

Ground Water Systems

1. A more detailed analysis should be provided with respect to the joint and fracture system in the proposed mine area and also this system's relation to local springs and seeps. The extent of the perched water table system should also be addressed. In addition, analyses should also be performed with regard to the expected effects of mining on the joint and fracture system and subsequent impacts of springs and seeps (particularly Little Bear Spring). The source of water in the Star Point Sandstone should also be addressed.
2. A detailed inventory of all springs and seeps in the mine vicinity (including Mill Fork Canyon, Little Bear Canyon and portions of Crandall Canyon) should be supplied. The inventory should include surficial location, stratigraphic location, flow, quality, and any evidence of use. Color infrared photography might benefit the inventory.
3. Water conditions in the existing mine should be described in terms of source, flow and quality.
4. The stratigraphic relation (in feet) of the Blind Canyon Coal Seam to Little Bear Spring should be specified (particularly in the mine area closest to Little Bear Canyon).

5. The applicant should provide a detailed spring and seep monitoring program (including sampling locations, frequency, and methods).
6. Information should be supplied with regard to the monitoring program currently in effect at Little Bear Spring.

Hydrologic Impact of Roads

1. A general drainage plan for roads should be provided.
2. Culvert and ditch specifications should be supplied and ability to safely pass required design flows should be demonstrated.
3. Road maintenance practices should be spelled out.
4. Discharge structures for drainage control devices should be described.

Soils

1. Map and description of soils in the area where topsoil will be "borrowed" and in other areas to be disturbed. Description of topsoil recovery, storage redistribution and compaction plan.

Vegetation

1. Description of plan to use native species, including trees, shrubs, and forbs, as well as grasses, in revegetation of disturbed lands. How will areas be planted, mulched, fertilized and managed to assure revegetative success?

Wildlife

1. Description of plan to protect wildlife during and after operations by controlling and posting vehicle speed, limiting night-time coal haulage, preventing wind and water-born sediment or coal particles from entering streams, preventing coal or other material spills from entering streams, revegetating, access control, etc.

Subsidence

1. Detailed description of subsidence control and monitoring plan to include subsidence predictions, percent recovery in major segments of the mine, bearing strength and location of coal remnants, types and locations of artificial support, construction of subsidence measuring monuments, spacing of monuments, intervals of surveys, provisions for visual observation of effects, etc.

Dust Control

1. The plan should describe dust control measures for the tipples, ponds, stockpiles and other mine use areas.