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State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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December 15, 1992

TO: Pamela Grubaugh-Littig, Permit Supervisor

FROM: Thomas Munson, Senior Reclamation Hydrologist *TM*

RE: Review of Plan Amendments for the Hidden Valley Plan and the Abatement Plans of NOV N91-26-8-2, Hidden Valley Mine, Hidden Valley Coal Company, ACT/015/007, Folder #2, Emery County, Utah

Synopsis

This memo reviews the abatement plan titled Hidden Valley Coal Company Plan for Abatement of Notice of Violation No. N91-26-8-2, dated December 8, 1992, submitted on December 14, 1992 by JBR Consultants. This same document was faxed to the Division on December 11, 1992. The review was carried out on the JBR submittal. No other documents or submittals by the operator were reviewed.

Analysis

The operator has provided a plan that treats the gully erosion at the outfalls of the road water bars using alternative erosion control methods. These methods have not been tried at other mine sites in Utah with these slope conditions, in other words, the operator is attempting to repair gully erosion on slopes beyond the envelope of design parameters.

The treatment of the water bar outfalls were reviewed under the operator's assumptions and premise that the gullies will not act as diversions. If this assumption proves false the following analysis will be revised and changes to the plan will be required. It has been determined by the operator that the only acceptable means of treatment is using fiber dams, reshaping the gullies by hand, and where feasible laying synthetic fiber erosion matting.

The operator states that the function of these porous dams will be to reduce velocity of runoff in the outfall, causing sediments to deposit behind and within the dams. It was assumed that deposition of sediments behind these dams will build up the gully floor to a reasonable elevation. The overall result will be a series of steps down the outfall, with the flat sections vegetated and the steep

sections stabilized. In addition to the work performed on the gullies, the water bars will be improved by adding more substantial check dams perpendicular to the water bars.

The plan amendments discussing the NOV abatement plan are found in the PAP on revised pages 21-b, 27, and 52-b. The NOV abatement plan has been placed at the end of Appendix III of the PAP. The plan amendments were part of the December 8, 1992 submittal.

Recommendations

The amendment plans and the abatement plan for the NOV are considered the same based on the review of the revised pages submitted, referencing the abatement plan of December 8, 1992 as being included at the end of Appendix III.

The Division accepts these plans as a means of potentially repairing the gullies at the water bar outfalls, but does not believe that these methods are considered standard engineering practices for use on the vertical unconsolidated gully slopes found at Hidden Valley.

In accepting gully repair and water bar enhancement as an appropriate abatement of N91-26-8-2, the Division is not making a statement that the site is erosionally stable. Therefore the Division is not representing that, in the event of failure of these gully structures, measures beyond those contemplated by JBR, will not be required. Nor is the Division representing that the present site configuration will meet future bond release criteria with respect to erosion. Site maintenance in accordance with performance standards, rules, and the permit is an ongoing responsibility of the operator.

In making the finding that the plan submitted to abate N91-26-8-2 is acceptable, the Division is not representing that the present site configuration is acceptable for post-mining land use and bond release purposes or that compliance with the sediment control performance standards cited at R645-301-752 has been established with respect to future inspections.

The operator must meet the implementation date of April 1, 1993 and the work completed within thirty days.