



State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

Michael O. Leavitt
Governor
Ted Stewart
Executive Director
James W. Carter
Division Director

355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203
801-538-5340
801-359-3940 (Fax)
801-538-5319 (TDD)

September 1, 1994

TO: Darron Haddock, Permit Supervisor

FROM: Tom Munson, Hydrologist *T.M.*

RE: Draft Review, Sediment Control Measures, Hidden Valley Coal Company, Hidden Valley Coal Mine, ACT/015/007, Working File, Emery County, Utah.

SYNOPSIS

On August 16, 1994 the Division received a submittal from JBR consultants discussing issues identified in the July 21, 1994 meeting with Mr. Carter and certain Division staff. My review of this submittal relates to my understanding of the regulations and how this submittal relates to the rules and fits the existing plan.

ANALYSIS

The review of this submittal is complete. It addresses the information needed to assess the use of the non-traditional fiberdams for erosion control in the severe, highly erosive environment found at the Hidden Valley mine. The outfalls of the water bars found on the reclaimed road leading to the site of the reclaimed Hidden Valley Mine have been treated using rock, fiberdams, and rock check dams perpendicular to the faces of the water bars. The fact that we call these structures diversions or sediment control structures does not change the fact that the operator is meeting the requirements of the regulations by minimizing erosion to the extent possible in this environment and preventing additional contributions of suspended sediments from entering Ivie Creek based on current sediment controls and maintenance of these structures. The establishment of a permanent and diverse vegetative cover over time will only help ameliorate erosion and contributions of sediment. Data is being collected and will continue to be collected by the Division and the operator to determine the gross impacts of sediments and erosion on ephemeral washes and perennial desert streams such as Ivie Creek. Until such time as we have the substantial meaningful data on sediment contributions will the CHIA be updated and the determinations made in 1986 be changed or updated. A finding of no significant impact was made then and is

still considered valid from a surface and ground water standpoint.

The information found regarding maintenance of these structures is found on page 21-E of the amendment and described as the following commitments:

1.) All structures will be inspected once a month.

2.) All repairs due to substantial runoff damage will be repaired within one calendar month following the discovery of the damage. A photographic record will be kept to track the condition of the sediment control measures and to identify trends towards stabilization. (page 21-E).

FINDING/RECOMMENDATION

The Division feels that this submittal in combination with the work done in the field is adequate to meet the requirements of the regulations regarding minimizing erosion to the extent possible, preventing additional contributions of sediment to Ivie Creek, and meeting any applicable State and Federal Effluent criteria.