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# State of Utah

## DEPARTMENT OF NATURAL RESOURCES

BRIAN C. STEED  
Executive Director

### Division of Oil, Gas and Mining

JOHN R. BAZA  
Division Director

January 10, 2020

Rick Parkins, President  
Bronco Utah Operations, LLC  
P.O. Box 527  
Emery, Utah 84522

Subject: Conditional Approval of Midterm Completion Response, Bronco Utah Operations, LLC, Hidden Valley Mine, C/015/0007, Task #6045

Dear Mr. Parkins:

The above-referenced amendment is approved conditioned upon receipt of 2 clean copies prepared for incorporation. Please submit these copies by February 11, 2020. Once we receive these copies, final approval will be granted.

A stamped incorporated copy of the approved plans will also be returned to you at that time, for insertion into your copy of the Mining and Reclamation Plan.

If you have any questions, please call me at (801) 538-5350.

Sincerely,

Steve Christensen  
Coal Program Manager

SKC/sqs

cc: John Gefferth

Kit Pappas

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## Technical Analysis and Findings

### Utah Coal Regulatory Program

**PID:** C0150007  
**TaskID:** 6045  
**Mine Name:** HIDDEN VALLEY MINE  
**Title:** MIDTERM COMPLETION RESPONSE

### Summary

This application updates Appendix 1-1 with ownership and control information for Bronco Utah Operations, LLC. Bronco will proceed with vegetation analysis required for bond release of the Hidden Valley Mine. (MRP Chap III page 8). Reclamation of the 6.7 acre site was completed in 1986 with additional work completed in 1989 and 1994 (p. 52 A & 52B) and in 1997 (Amendment 97B).

pburton

### General Contents

#### Identification of Interest

*Analysis:*

The application meets the State of Utah R645 requirements for Identification of Interest. The Chapter I, Appendix I-1, Directors, Ownership & Control has been updated to reflect the end date of 4/1/2019 for Bart Hyta as Chief Executive Officer and President of Bronco Utah Operations, LLC, Bronco Utah Reserves, Inc. and Bronco Coal Resources, LLC and has been updated to add Rick Parkins as Chief Executive Officer and President with a start date of 4/1/2019 with the listed companies. These updates have been entered into the AVS effective 12/17/2019.

ssteab

#### Violation Information

*Analysis:*

The application meets the State of Utah R645 requirements for Violation Reporting. Appendix I-IV (History of Violations) is current for the past 3 three years.

pburton

### Environmental Resource Information

#### Vegetation Resource Information

*Analysis:*

The amendment meets the State of Utah R645-301-320 requirements for Vegetation Resource Information.

On Page 5-97b of the amendment, the Permittee commits to conducting vegetation sampling in the reclaimed areas as well as the reference area(s). The results will be provided no later than the 2020 annual report to the Division.

tmiller

## **Maps Vegetation Reference Area**

*Analysis:*

The amendment meets the State of Utah R645-301-323 requirements for Vegetation Reference Area Maps.

Plate III-1 of the amendment depicts the location, boundary, and GPS coordinates for the B-Side reference area. The location and boundary of a potential A-Side reference area is also shown, although, it has not been sampled or formally submitted for inclusion as of this time.

tmiller

## **Reclamation Plan**

### **PostMining Land Use**

*Analysis:*

The amendment meets the State of Utah R645-301-412 requirements for Postmining Land Use.

Page 5-97b of the amendment clarifies the reclassification of the postmining land use for the site to wildlife habitat.

tmiller

### **Revegetation Timing**

*Analysis:*

The amendment meets the State of Utah R645-301-354 requirements for Revegetation Timing.

Pages 2-97b and 5-97b of the amendment clarify the dependence of establishing revegetation timing on the vegetative sampling the Permittee has committed to do in 2020. Once the data from the 2020 sampling is available, a more solid reclamation and/or Phase III bond release plan can be implemented.

tmiller

### **Revegetation Standards for Success**

*Analysis:*

The amendment meets the State of Utah R645-301-356 requirements for Revegetation Success Standards.

Page 5-97b of the amendment clarifies the postmining land use for the property as wildlife habitat and it also contains a commitment to perform vegetation sampling in the reclaimed and reference areas. The B-Side reference area is clarified on Plate III-1 and a "potential" A-Side reference area is also identified. Following the receipt of the vegetation sampling results, viable success standards can be made and applied to the current state of the site and a path forward, either involving reclamation, Phase III bond release, or both, can be made.

tmiller

### **Bonding and Insurance General**

*Analysis:*

The application meets the State of Utah R645 requirements for General Bonding and Insurance.

The application satisfies the requirements of R645-301-820 and -830.300 because the narrative on Chapter III, pages

69a and 69b indicate that the reclamation bond has been escalated as previously requested. A 5-yr escalation factor of 2.32% has been applied, increasing the reclamation bond by \$16,000 to \$148,000.

jeatchel

### **Bonding Determination of Amount**

*Analysis:*

The application meets the State of Utah R645 requirements for Determination of Bonding Amount.

The application satisfies the requirements of R645-301-830 because the narrative on Chapter III, pages 69a and 69b indicate that the reclamation bond has been escalated, and an updated Bond Estimate included. A previous deficiency erroneously claimed that the posted bond needed to be increased by \$36,000, but that claim was made because the Bond Cost Estimate calculations within the MRP had not been updated. The Permittee posted an additional \$16,000 effective November 14, 2019 to account for 5-yr escalation, bringing the total posted bond to \$148,000.

jeatchel