



State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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May 21, 2001

TO:

~~Internal File~~

FROM:

Peter Hess, Reclamation Specialist, Team Lead

RE:

Notice of Temporary Cessation, Energy West Mining Company, Trail Mountain Mine, C/015/009, TC01B

SUMMARY:

On March 7, 2001, underground coal extraction operations at the Trail Mountain Mine ceased. At that time, the permittee began the removal of mining machinery from the mine workings. The sealing of the Trail Mountain Mine was completed on May 2, 2001, via the MSHA approved sealing plan.

On May 2, 2001, the permittee notified the Utah Division of Oil, Gas and Mining of its intent to enter the Trail Mountain Mine into temporary cessation status. That document was received in the Division's Salt lake office on May 7, 2001 and in the Price Field Office on May 9, 2001.

This document has been prepared to determine the adequacy of the permittee's notification that the Trail Mountain Mine and its associated facilities have met the requirements of the R645 coal rules relative to temporary cessation status.

TECHNICAL ANALYSIS:

RECLAMATION PLAN

CESSATION OF OPERATIONS

Regulatory Reference: 30 CFR Sec. 817.131, 817.132; R645-301-515, -301-541.

Analysis:

TECHNICAL MEMO

As noted above, underground coal extraction ceased at the Trail Mountain Mine on March 7, 2001. All of the current leases held by Energy West had been depleted as of that date with the exception of two remaining panels in Federal lease 49332. These two panels were left to provide ground protection for the First West Mains, Main South, and Third West Mains, which have been left (i.e., no secondary extraction) in order to provide access to the Cottonwood Canyon tract. The Cottonwood Canyon tract is owned by the State of Utah and managed by the School and Institutional Trust Lands Administration.

Regulation R645-301-515.300 requires that the mining and reclamation plan for a permitted mine site incorporate a procedure for the temporary cessation of operations. Temporary cessation is briefly discussed within the Trail Mountain Mine mining and reclamation plan Volume 1, Chapter 3, page 3-31, Section 3.3.6.4 TEMPORARY CESSATION. That section of the mining and reclamation plan commits the permittee to notify the Division whenever it is known that operations will be ceased for more than thirty days via a notice of intent.

As noted within the summary, Energy West Mining Company submitted a notice of intent to the Division on May 2, 2001 to enter the Trail Mountain Mine into temporary cessation status.

Regulation R645-301-515.310 requires that the permittee meet all of the terms and conditions of the currently approved mining permit, irregardless of the fact that the permitted site is considered to be under temporary cessation. Paragraph 2 of Section 3.3.6.4 TEMPORARY CESSATION mentioned above, commits the permittee to include within the notice of intent a description of the mitigation measures to be employed in accordance with the terms and conditions of the permit approval, such as a statement of the number of surface acres involved in the cessation, extent of sub-surface strata, prior reclamation efforts accomplished on the property, and identification of all backfilling, regrading, revegetation, environmental monitoring, underground opening closures, and water treatment activities that will continue during the temporary cessation.

The permittee's May 2, 2001 notice of intent also makes the commitment to continue compliance maintenance as necessary in order to meet all permit conditions.

Regulation **R645-301-515.311** requires that the permittee will effectively support and maintain all surface access openings to underground operations, as well as all surface facilities in which there are no current operations, but operations are to be resumed under an approved permit. This regulation applies to the six portals into the Hiawatha seam, as well as one opening which was inaccessible. The six outcrop portals were sealed in by the outcrop as specified in 30 CFR Part 75.335, in accordance with the MSHA approved sealing plan. The inaccessible opening was completely backfilled with non-combustible fill from the surface. Effective support remains in place at the outcrop through the use of concrete archways and other standard methods of ground control. Volume 1, Chapter 3, Page 3-31 of the currently approved mining and reclamation plan allows the use "of a

chain link or other substantial wire mesh fabric fence placed over the portals to prevent public access.....Locked gates may be installed in the portal to allow for mine inspection". As observed on May 17, 2001, chain link fencing has been installed at the outcrop to prevent unauthorized access to the Mine's seals.

All other surface facilities including the mine buildings and shops, coal storage handling/loading facilities, and sediment containment structures are covered under this requirement.

Regulation **R645-301-515.312** is relative to a surface coal mining and reclamation operation. Trail Mountain Mine was an underground coal extraction operation. This regulation is not applicable.

Regulation **R645-301-515.320** requires the permittee to submit a notice of intent to cease or abandon operations, as soon as it is determined that the period of temporary cessation will extend beyond thirty days. Energy West Mining Company notified the UDNR/OGM with its notice of intent to enter into temporary cessation status on May 2, 2001. The portal seals at the Mine were completed on the same day.

Regulation **R645-301-515.321** requires any permittee who conducts underground coal mining and reclamation activities and who has submitted a notice of intent to enter into temporary cessation include with said notice a statement of the exact number of surface acres and the horizontal and vertical extent of subsurface strata which have been in the permit area prior to cessation or abandonment, the extent and kind of reclamation of surface area which will have been accomplished, and identification of the backfilling, regrading, revegetation, environmental monitoring, underground opening closures, and water treatment activities that will continue during the temporary cessation.

Energy West Mining Company's letter of intent to enter the Trail Mountain Mine into temporary cessation dated May 2, 2001, lists 10.69 acres of disturbed area and 3,538.98 acres within the permit area. No reclamation activities have been undertaken by the permittee; all surface facilities will remain intact at this time to enhance the potential for the development of the Cottonwood Canyon tract.

All revegetation work that has been performed is relative to topsoil storage area protection.

The closure of openings to access the underground workings has been previously addressed under **R645-301-515.311**.

There are no known water treatment activities occurring at the Trail Mountain Mine site. Ground water will no longer report to UPDES discharge point 002A. The permittee's notice of intent letter dated May 2, 2001 commits to the maintenance and monitoring of all hydrologic conveyance structures as specified in the mining and reclamation plan.

TECHNICAL MEMO

The continuation of environmental monitoring has been committed to by the permittee and has been discussed previously under **R645-301-515.310**.

Regulation **R645-301-515.322** is relative to a surface coal mining and reclamation operation. Trail Mountain Mine was an underground coal extraction operation. This regulation is not applicable.

Findings:

The Trail Mountain Mine mining and reclamation plan contains a procedural plan for the temporary cessation of mining operations as required by **R645-301-515.300**.

The commitment made by the permittee in the mining and reclamation plan and its reaffirmation to do so in the May 2, 2001 notification of temporary cessation to maintain the surface facilities for the underground mine, as well as prevent any environmental harm, adequately addresses the requirements of **R645-301-515.310**.

The commitment made by the permittee in the mining and reclamation plan and its reaffirmation to do so in the May 2, 2001 notification of temporary cessation to maintain the surface facilities for the underground mine adequately addresses the requirements of **R645-301-515.311**.

Notification of entrance into temporary cessation is not applicable to requirements of **R645-301-515.312**.

The permittee's notification to the Utah Division of Oil, Gas and Mining to enter the Mine into temporary cessation was made as soon as it was determined by the permittee that cessation of operations would extend beyond thirty days. Coal mining operations have ceased. The requirements of **R645-301-515.320** have been met.

The requirements of **R645-301-515.321** have been adequately met.

Notification of entrance into temporary cessation is not applicable to requirements of **R645-301-515.322**.

RECOMMENDATIONS:

Amendment C/015/009-TC01B adequately addresses all requirements of **R645-301-515.300 through -515.322**. It is recommended that amendment TC01B be approved as submitted.