



State of Utah
 DEPARTMENT OF NATURAL RESOURCES
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Technical Analysis and Findings

Utah Coal Regulatory Program

July 22, 2016

PID: C0150009
TaskID: 5240
Mine Name: FOSSIL ROCK MINE
Title: ABATEMENT OF NOV#21173

General Contents

Permit Application Format and Contents

Analysis:

The amendment does not meet the State of Utah R645 requirements for Clear and Concise.

The amendment is not filed in the format required by the Division. The amendment is not submitted in redline strike out form.

The amendment includes changes and or additions to the narrative in Volume 4, Chapters 5 and up 7. The changes shift paragraphs causing the narrative to be duplicated or cutout if the amendment is incorporated into the MRP. The amended pages must be formatted to be seamlessly incorporated into the MRP.

The amendment appears to have included duplicate copies of figures. Only one copy of each figure should be included in the amendment.

Deficiencies Details:

R645-301-120: The amendment does not meet the State of Utah R645 requirements for Clear and Concise.

The amendment is not filed in the format required by the Division. The amendment must be submitted in redline strike out form for all text added to the narrative.

The amendment includes changes and or additions to the narrative in Volume 4, Chapters 5 and up 7. The changes shift paragraphs causing the narrative to be duplicated or cutout if the amendment is incorporated into the MRP. The amended pages must be formatted to be seamlessly incorporated into the MRP.

The amendment appears to have included duplicate copies of figures. Only one copy of each figure should be included in the amendment.

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Operation Plan

Hydrologic Diversion General

Analysis:

The amendment does not meet the State of Utah R645 requirements for Diversions.

The amendment proposes six alternative ditch designs for Ditch DA in addition to leaving the original ditch design within the MRP for a total of seven scenarios. In general, alternative designs or scenarios may not be incorporated into an MRP in any circumstance because of the affects it has on bonding and the inspection and enforcement of inspectable units. Additionally, by definition a diversion must be, "constructed to divert water". Therefore the amendment must provide only one diversion design for incorporation into the MRP and the ditch must be constructed to this design.

Deficiencies Details:

R645-301-742.312: The amendment does not meet the State of Utah R645 requirements for Diversions. The following deficiency must be addressed prior to final approval:

The amendment proposes six alternative ditch designs for Ditch DA in addition to leaving the original ditch design within the MRP for a total of seven scenarios. In general, alternative designs or scenarios may not be incorporated into an MRP in any circumstance because of the affects it has on bonding and the inspection and enforcement of inspectable units. Additionally, by definition a diversion must be, "constructed to divert water". Therefore the amendment must provide only one diversion design for incorporation into the MRP and the ditch must be constructed to this design.

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