



# State of Utah

## DEPARTMENT OF NATURAL RESOURCES

MICHAEL R. STYLER  
*Executive Director*

### Division of Oil, Gas and Mining

JOHN R. BAZA  
*Division Director*

November 27<sup>th</sup>, 2018

Mr. Byant Bunnell  
Fossil Rock Resources, LLC  
597 South SR24  
Salina, Utah 84654

Subject: Midterm Completion Response, Fossil Rock Resources, LLC., Fossil Rock Mine, Task ID #5771, C/015/0009

Dear Mr. Bunnell:

The Division has reviewed the Midterm Completion Response and has recommended conditional approval. Final approval will be granted when the following conditions have been met:

- (1) The reclamation bond must be increased \$14,000 (from \$1,154,000 to \$1,168,000). In order to facilitate that increase, the following items are required: a rider increasing the bond amount, a revised Exhibit "D" and affidavits to revise the surety company from Ironshore Indemnity Inc. to Endurance Assurance Corporation. These documents are needed in order to update the Reclamation Agreement for the Fossil Rock Mine.
- (2) Upon the receipt of two clean hard-copies prepared for incorporation into the approved Fossil Rock Mining and Reclamation Plan (MRP). A stamped incorporated copy will be returned to you for insertion into your copy of the MRP.

The amount of additional bond required (i.e. \$14,000) was established on July 18<sup>th</sup>, 2018 with the completion of Task #5599. At that time, the outstanding deficiency relative to the amount of required bond increase was resolved with the calculations submitted by Fossil Rock Resources, LLC. As such, it's the Division's hope that we can complete the bond revision process without undue delay.

As a reminder, with the approval of this amendment a commitment was established to provide the Division with As-built drawings of the Fossil Rock Waste Rock Site by April 2019 (See Volume 4, Chapter 2, page 4, Re-mining 2016-2018). The commitment has been added to Fossil Rock's Annual Report document that will be coming to you in the near future.



Page 2

November 26, 2018

Subject: Fossil Rock, LLC- Midterm Completion Response (Task #5771)

Please submit the aforementioned documents and two clean hard-copies by December 10<sup>th</sup>, 2018. If you have any questions, please call me at (801) 538-5325.

Sincerely,



Daron R. Haddock

Coal Program Manager

DRH/sqs

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GARY R. HERBERT  
Governor

SPENCER J. COX  
Lieutenant Governor

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## Technical Analysis and Findings

### Utah Coal Regulatory Program

**PID:** C0150009  
**TaskID:** 5771  
**Mine Name:** FOSSIL ROCK MINE  
**Title:** MIDTERM COMPLETION RESPONSE

## Summary

The Fossil Rock Mine's midterm permit review commenced on July 20, 2017. After numerous reviews, the last and final deficiencies have been adequately addressed. The MRP meets the State of Utah R645 requirements for Coal Mining and Reclamation.

kstorrar

## Operation Plan

### Topsoil and Subsoil

#### Analysis:

The application meets the requirements of R645-301-230 Soil Operations Plan, because a commitment to provide the volume of topsoil/subsoil salvaged during re-mining of the waste rock site is stated in Vol. 4, Chapter 2, p. 4. That information is promised in six months or April 15, 2019.

Interim reclamation of the salvaged soil piles and cut slopes is described in Chap. 3, p.8 - 11. The seed mix is described in Table 300-5 on p. 10. Fertilizer ammonium nitrate 50 lbs/ac and triple superphosphate (75 lbs/acre) will be applied. Either an erosion control blanket or 2 tons/acre hay mulch will be applied (p. 11). There is a criteria stated for interim revegetation success which is 60% ground cover, to be determined during spring and fall inspections.

pburton

## Reclamation Plan

### Topsoil and Subsoil

#### Analysis:

The application meets the requirements for Reclamation soils handling.

This application contains a temporary cessation notice dated October 15, 2018 (Incoming document 10172018.5771) which applies to both the waste rock and mine facilities locations.

At the waste rock site, the plan for reclamation has not changed. The MRP calls for seeding as soon as practicable following soil placement. Fertilizer application (Ammonium nitrate 50 lbs/ac and Triple Superphosphate (75 lbs/ac), following by seeding and a mulch application (either mulch blanket or alfalfa hay crimped in to the soil (Chap 3, p. 13). Hydroseeding will be followed by wood fiber mulch at 2,000 lbs/acre ( Chap 3, p. 11).

At the facilities yard coal will be removed from the soil surface. Salt laden soils and acid/toxic forming waste will be buried below four feet. Soils with 50 or less coal will be placed against the highwall. The final graded surface will be scarified to a depth of 12 – 24 inches. Surface soils will be sampled for nutrients (Section 3.5.5.1)

pburton

## **Stabilization of Surface Areas**

### *Analysis:*

The application meets the requirements of R645-301-244, Stabilization of Surface Areas.

At the waste rock site, the plan for soil stabilization has not changed. The MRP calls for pocking and soil tackifier on slopes greater than 20% (Chap 2, p. 5). Erosion control blanket or 2 tons/ac alfalfa hay mulch will be applied followed by 2,000 lbs/ac wood fiber mulch (Chap 3, p. 13).

At the mine site: Section 3.5.5.2 states depressions will be created in the soil to hold moisture. One ton/acre straw will be incorporated into the soil during surface roughening (Section 3.5.4, item e, p. 62). Slopes greater than 2.5h:v will be hydroseeded (Section 3.5.5.2, p.68)

pburton