



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

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February 23, 1994

TO: File

THRU: Daron Haddock, Permit Supervisor

FROM: Steven M. Johnson, Reclamation Hydrologist *SMT*

RE: Mid-Term Response, part II, Division Order #93B, Consolidation Coal Company, Emery Deep Mine, ACT/015/015-94A, Folder #2, Emery County, Utah.

SUMMARY

Consolidation Coal Company (Consol) submitted revised proposals addressing requirements 1 through 4 in response to Division Order #93B and the first proposal deficiencies. They changed Sections VI.B.2 and VI.B.3 to include Pond No. 8, removed references to small area exemptions, and redesigned alternate sediment control measures. A complete cross-reference was included relating the MRP to the R645 regulations. The proposed changes were reviewed in February 1994.

ANALYSIS

Consol has reclassified all the small area exemptions (SAEs) as alternate sediment control areas (ASCAs). With this reclassification, designs were included for the alternate sediment control measures. There were five measures used for sediment control on areas not treated by sediment ponds. These methods are: catch basins, runoff collection berms, rock check dams, silt fences, and vegetative cover.

Five areas were grouped as areas with vegetative cover sediment control. These areas are three borehole pump sites, the test plot site, and the fire control area. Except Borehole 3, Consol showed that vegetation covers these areas at, or near, the same rate as the surrounding area, and protects them to the same extent. Borehole 3 has no vegetation on site, so it is not practical to use vegetation as sediment control at this time; however, Consol proposes a silt fence until a vegetative cover can be established. They have initiated a plan of soil sampling and seeding to promote the growth of a plant cover.

There is a road to borehole pump # 1 that is not included in the MRP. Consol discussed a plan for reseeding this road in their memorandum included with this amendment;



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however, they did not include this information in the amendment. There are some questions about the timing of the seeding and the type of seed that will be used that should have been answered in this amendment.

Finally, a cross-reference list has been included correlating the MRP to the Utah R645, Coal Mining Rules. The list appears helpful in referencing the current rules; however, Chapter 6, Hydrology was omitted from the list.

RECOMMENDATION

This new revision is hydrologically complete. The new alternate sediment control designs properly address the regulations and the conditions of the division order. This amendment should be approved with a couple stipulations. First, information about the borehole pump # 1 road should be included along with the information about the reseeding activity. If seeding is to take place in the spring the Division's Reclamation Biologist suggest that it should be done as soon as possible. Second, the cross-reference list should be made complete by including references for chapter 6.

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