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DEPARTMENT OF NATURAL RESOURCES

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Technical Analysis and Findings
Utah Coal Regulatory Program

PID: C0150015
TaskID: 4654
Mine Name: EMERY DEEP MINE
Title: REVEGETATION & DUST CONTROL REVISION

Operation Plan

Mining Operations and Facilities

Analysis:

The 4th East portal coal fines monitoring has been conducted over a period of ten years (2004 - 2014). The monitoring was initiated as an abatement for Notice of Violation N03-39-1-1 which was issued for coal fines off the permit area. In 2003, a large stockpile of approximately 10,000 Tons of coal existed at the 4th East portal. At the present time, the stockpile is non-existent. The mine has been idle since 2011. A summary of the 10 year monitoring is added to the MRP in App. X.C-3. The conclusions of the study were that coal fine deposition of between 1 and 10 mm depth off site has been gradually mixed into the soil by wind and water action. Photographs taken in 2014 illustrate no adverse effect to vegetation and no long term effect to soil albedo (solar reflection). The dust control monitoring is no longer necessary while the mine is idle and will not resume unless unforeseen circumstances require it.

This application states that the dust control monitoring and maintenance of Phase I dust controls outlined in Appendix X.C-3 will be suspended until mining activity resumes at the 4th east portal (Chap X-C, p. 5a).

The Permittee is in compliance with R645-301-526.222.

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Topsoil and Subsoil

Analysis:

This application changes the information in Chapter III p. 4a to reflect the course of action agreed upon during a meeting held at the mine site on April 16, 2014. The application states that the three recommendations made on page 5/5 of Section 11 (Contemporaneous Reclamation) of Division Inspection Report #3810 will be implemented. The amendment then summarizes the work to be accomplished. Some items of the work were not mentioned in this summary. So that there is no misunderstanding about what is to be accomplished, the summary on page 4a should specify that each reclamation site will be disced on the contour to incorporate 1 ton/acre straw or hay mulch and then seeded with the revised interim mix and that all sites will be resampled after grading for pH, EC and SAR. Secondly, the numbering of the bullets on page 4a should be re-examined, as it is confusing.

Deficiencies Details:

R645-301-121.200, So that there is no misunderstanding about what is to be accomplished, the summary on page 4a should specify that each reclamation site will be disced on the contour to incorporate 1 ton/acre straw or hay mulch and then seeded with the revised interim mix and that all sites will be resampled after grading for pH, EC and SAR from depths 0-6 and 6-12 inches. Secondly, the numbering of the bullets on page 4a should be re-examined, as it is confusing.

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Reclamation Plan

Contemporaneous Reclamation General

Analysis:

On August 22, 2014 the Division received an amendment to update certain portions of the current reclamation plan for the Emery Deep mine. This memo will include a review of that information.

The three areas that were chosen to demonstrate reclamation success include;

Sites 3-5 (pond 6 stockpiles. Map III-2);

Site 21 (partially removed reverse osmosis pond #4. Plate III-4) and;

Site 14(long subsoil pile adjacent to the proposed prep plant site. Chapter III, App.III, Table I).

The vegetative success of these sites would be compared to control sites 12 and 13.

Deficiencies Details:

The amendment should include a vegetation success monitoring schedule for the three areas that are seeded.

jhelfric