



State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

1594 West North Temple, Suite 1210

PO Box 145801

Salt Lake City, Utah 84114-5801

801-538-5340

801-359-3940 (Fax)

801-538-7223 (TDD)

Michael O. Leavitt
Governor

Lowell P. Braxton
Division Director

October 12, 1999

To: File

Thru: Pamela Grubaugh-Littig, Permit Supervisor. *PL*
Daron Haddock, Permit Supervisor *10/24*

From: Peter Hess, Reclamation Specialist III, Team Lead *PHH*

RE: Rilda Canyon Access Revision, PacifiCorp, Deer Creek Mine, ACT/015/018-99B, Folder #2, Emery County, Utah

SUMMARY:

This technical analysis has been prepared in response to Energy West's response (received October 7, 1999) to technical deficiencies forwarded to you on August 5, 1999. This analysis only covers issues from the applicant's disturbed area perimeter (the gate across the Rilda Canyon access road) up to and including the Rilda fan pad and the Mine portals. Issues relative to the Emery County road in Rilda, the highway entrance to State Highway 31, the Utah Division of Wildlife Resources and/or the US Forest Service will not be addressed here.

TECHNICAL ANALYSIS:

OPERATION PLAN

ENGINEERING

Regulatory Reference: R645-301-527, et al.

Analysis:

Transportation Facilities Classification of Roads

Analysis of Energy West's response to this deficiency indicates that the applicant feels the current design and P.E. certification for the Rilda Canyon road are adequate to meet the increase in usage and heavy vehicle weights which will be encountered in changing the road classification from ancillary to primary. Weigh tickets have been included with this most recent response which provide verification that the road supported heavy loads of gravel and fill material during the Rilda fan pad construction period.

Rilda Canyon Access Revision
ACT/015/018-99B
October 12, 1999
Page 2

The applicant has submitted a revised page 41 (red line/strike out version) to the Deer Creek Mine MRP which (upon approval) will change the road access from emergency use only to allow hauling of 5.4 truckloads/day of bulk material to the Rilda Canyon portals. These materials will consist of longwall gate road support materials (cans), ventilation stopping construction materials (Omega blocks), and road base.

As described under R645-301-527.122, the Rilda Canyon road will now be a primary road, as the usage period will extend from April 16 through November 30, (UDWR elk/deer winter range stipulation). The Deer Creek Mine MRP must be modified to change this road's classification from ancillary to primary, should wording relative to same exist in other areas of that plan.

Although the applicant has submitted information relative to the design adequacy of the road under examination, and that information appears to be adequate from this reviewer's perspective, the U. S. Forest Service, Manti La-Sal National Forest must also examine the newly submitted information and either endorse the current design and P.E. certification or require additional information. USFS consensus on this road design/certification is necessary prior to UDNR/OGM approval of same.

Findings:

Information provided by the applicant relative to the adequacy of design and construction of the Rilda Canyon access road appears to be adequate. The applicant has not provided a new P.E. certification as was requested; the stamp on drawing numbers CE-10891-EM, 1 of 3 and 2 of 3 and CE-10890-EM, as provided by Mr. John Christensen, P. E., has no date. It is assumed that the applicant deems the original certification of the road design as adequate.

The applicant must make any changes relative to the classification of the Rilda Canyon road as necessary to the Deer Creek Mine MRP.

The U. S. Forest Service, Manti La-Sal National Forest must endorse the current road design as adequately meeting that agencies' design criteria for roads.

SEDIMENT CONTROL/SNOW REMOVAL

Regulatory Reference: R645-301-731.121, 742.423.1

Analysis:

**Protection of Surface Water Quality
Primary Road Drainage Controls**

The applicant's snow removal plan relative to the Rilda Canyon road above the disturbed area perimeter gate was determined to be adequate in the 8/5/99 technical review. The most recent submittal includes a revised red line/strike out page 41 which adequately reflects this new plan and updates the MRP.

Findings:

The permittee's snow removal operation plan is adequate to meet the requirements of R645-301-731.121 and 742.423.1.

Analysis of Stipulations

Page 3 of the August 5th technical review as prepared by this individual discussed four stipulations. This section will re-review those same items.

- 1) Page 43, stipulation #4, indicated that no surface facilities map of the Rilda pad area had been submitted in the original document to designate where the bulk material items would be stored. Information received 10/7/99 from the applicant includes a drawing (designated as Rilda Canyon Surface Facility Map) which shows a gravel storage area and a "can" storage area. It is assumed that Omega blocks will be unloaded and then taken immediately underground for storage. The drawing adequately fulfills this requirement.
- 2) Page 43, stipulation #5 refers to the unauthorized access lock out procedure at the permittee's disturbed area perimeter gate. The applicant has revised this procedure such that the gate will be allowed to remain open as long as Energy West personnel are on the surface at the Rilda pad, (i.e., the gate will be allowed to remain open while the tractor/trailer is up on site). This revised procedure needs endorsement from the USFS before it can be approved by UDNR/OGM.
- 3) Page 43, stipulation #7; the 10/7/99 submittal, page 2, indicates that Energy West Mining Company and/or the tractor/trailer driver will determine when the road is unsuitable for delivery of material. This appears to be acceptable. The nature of the surface material on the Rilda road is such that if too much moisture permeates same, traction/vehicle control problems may arise. The driver is probably the best judge of when he can or cannot deliver material up this road. Also, Energy West has committed to repairing any damage to the road (and its associated drainage controls) as noted under revised stipulation #14, (page 43 of 10/7/99 submittal).
- 4) Page 43, stipulation #13 of the original submittal indicates that "material will not be hauled out of the Rilda portal down the Canyon without prior written approval."

It was suggested in the 8/5/99 response to Energy West that this be revised to read "Materials such as coal, coal mine development waste, and/or non-coal waste will not be hauled out of the Rilda Canyon portal and transported down the Rilda Canyon road without prior written approval from the USFS Manti La-Sal National Forest, Utah DWR, and the Utah Division of Oil, Gas, and Mining."

The applicant's 10/7/99 submittal reflects change under stipulation #13, page 43.

- 5) The applicant's 10/7/99 submittal includes a revised red line/strike out version of page 3-7, Volume 2 of the Deer Creek Mine MRP. This was submitted in response to the "RECOMMENDATION TO APPLICANT" in the 8/5/99 UDNR/OGM response to Energy West. Same accurately reflects surface conditions at the Rilda Canyon facilities.

CONCLUSIONS AND RECOMMENDATIONS

It is felt from a R645 rule application, that the revisions and additional information which the applicant has submitted with the 10/7/99 submittal, that ACT/015/018-99B is adequate to meet the requirements of the aforementioned rules.

It is still necessary for the U. S. Forest Service, Manti La Sal National Forest to provide endorsements for the design adequacy of the Rilda Canyon road above the gate, as well as an endorsement to leave the access gate open while the tractor/trailer is inside the Rilda disturbed area.

Once the endorsements from the USFS are received, it is recommended that ACT/015/018-99B be approved.

sd

C:\Shared\WP\PETE\MINES\DEERCREE.K\AMENDMEN\MEMOS\rildarev.99B.wpd