



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

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February 23, 1998

Dennis Winterringer
Denver Field Division
Office of Surface Mining
Reclamation and Enforcement
1999 Broadway, Suite 3320
Denver, CO 80202-5733

Re: Channel Canyon Breakout - Phase III Bond Release, Cottonwood/Wilberg Mine,
PacifiCorp, ACT/015/019, Folder #3, Emery County, Utah

Dear Mr. Winterringer:

Enclosed please find the decision document for the Phase III bond release for the Channel Canyon Breakout at the Cottonwood/Wilberg Mine. Please review this document and notify the Division of your concurrence or comments. If you have any questions, please call me.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Pamela Grubaugh-Littig'.

Pamela Grubaugh-Littig
Permit Supervisor

Enclosure

cc: Chuck Semborski, Energy West
Price Field Office

DECISION DOCUMENT
CHANNEL CANYON BREAKOUT
PHASE III BOND RELEASE
COTTONWOOD/WILBERG MINE
ACT/015/019-97G

Background

The Channel Canyon ventilation breakouts consisted of two separate portals which occur on a steep escarpment located in an un-named canyon on the western side of East Mountain. According to the reclamation plan in the Cottonwood/Wilberg plan, two sets of seals were to be constructed at the Channel Canyon Portal. The first set were constructed in December 1990 (approximately 25 feet from the outcrop.) The seals were inspected and approved on May 13, 1997. An additional set of seals were constructed at the outcrop to conform with the near vertical slope. Energy West completed final reclamation of the these portal sites as specified in the approved plan on August 1, 1997.

Reclamation activities included constructing a set of seals that conform to the coal outcrop and to blend in with the surrounding environment. Reclamation work included building additional seals at the outcrop, brushing blacktar over the front of the seal to blend in with the natural environment, removing walkway and escape structures, and removing any refuse leftover from the reclamation processes. All materials were flown in and out by helicopter due to the remoteness of the portals. Existing structures were also dismantled and removed from the area.

The portals are located in the coal outcrop on a vertical cliff face. No topsoil was available to be stored during development or reapplied during final reclamation. Without topsoil, seeding of the portal area is unwarranted. No discharges are generated from and no drainage occurs through the portal sites.

These breakouts are located within federal coal lease U-47978 in the SW1/4SW1/4NW1/4 of Section 32, Township 17 South, Range 7 East. Total disturbance associated with the ventilation breakouts is approximately 0.01 acres.

Publication of this permitting action for Phase III bond release for the Channel canyon Breakouts was published in the Emery County Progress on December 9, 16, 23, and 30, 1997. No comments were received. Letters were sent to landowners, no comments were received.

Summary and Findings

The referenced amendment was received in the Price Field Office on September 15, 1997, six copies submitted to Salt Lake Office together with a memorandum on September 16, 1997. A field investigation was conducted on September 23, 1997. Mike Kaminski represented BLM, the land management agency.

Because of the topography, the portals being located on a steep rock escarpment, the final seals constructed next to the escarpment, in addition to other reasons, the area in question cannot be backfilled and topsoiled, and therefore, seeding of the area disturbed by the portal breakouts is unwarranted.

The soils and biology evaluation and findings that Phase I and Phase II bond release are not applicable because the affected area occurs on a solid sandstone escarpment are valid. Further, it is not warranted to topsoil or seed the areas associated with the breakouts and sealing of the portals. Therefore, Phase I and Phase II requirements on soils and biology have been met.

Further, since the area is not backfilled and topsoiled, the disturbed solid rock escarpment area is not subject to erosion. Therefore, no erosion maintenance required.

As related to Phase III, the area is presumed to receive under 25 inches of precipitation a year, the liability period is 10 years¹. However, the 10-year period relates solely to an evaluation period on the effectiveness of the Phase I and Phase II work and maintenance associated therewith. Further, since maintenance is not an issue, the Phase III bond release time frame should be waived.

The soils and revegetation reclamation for final revegetation of all lands disturbed by coal mining and reclamation operations is included in the approved MRP and does not require traditional reclamation on the portal areas in question. (See permittee's amendment application pages 3.6, 3.7, 4.1 and 4.1.1.)

Soils, R645-301-200.

Analysis. Associated with the portal breakouts:

- (1) The two breakouts are each 20 feet wide and 8 feet high. The rock ledge, void of topsoil, is about 45 feet long and with width averages of 4 feet.
- (2) No soils were available, harvested, or stockpiled. The breakout took place on a steep solid rock escarpment.
- (3) The topography is such that topsoil, even if readily available, could not be placed or held on such a steep and solid rock escarpment.

¹ R645-301-357.220. "In areas of more than 26.0 inches average annual precipitation, the period of responsibility will continue for a period of not less than five full years."

Findings. Topsoil placement is unwarranted on this reclamation project.

Biology, R645-301-300.

Analysis. Since soil cannot be placed and held on the escarpment and whereas the escarpment consists of bare rock, seeding is not warranted.

Findings. This area need not be seeded.

Protection of Fish and Wildlife and Related Environmental Values

Analysis. The reclamation and portal sealing will not have any significant impact on wildlife and environmental values. Bats may have utilized the unsealed portal; however, bat populations are only speculative because of the general area being void of surface water.

Findings. The project will not have any significant impact on fish, wildlife, and related values. The operator tarred the front of the seals to better blend with the natural exposed coal seam.

Safety

Analysis. The portals lie on an inaccessible escarpment at the base of a rock strewn canyon, accessible by foot near the Trail Canyon Mine, adjacent to and about one mile east of Emery County Road 506.

Findings. Since the access ladder has been removed, the sealed portals are difficult to access; therefore, pose no human safety hazard.

Land Use, R645-301-400.

Analysis. The post-mining land use is wildlife.

Findings. The post-mining land use is wildlife. Elk droppings were observed. The general area appears to be a winter habitat area for deer and elk. It also provides habitat for birds and small mammals.

Engineering, R645-301-500.

Non-coal Waste

Analysis. No non-coal waste was observed on the solid rock ledge adjacent to the sealed portals, nor on the natural outslope below the portals.

Findings. The permittee has met this requirement.

Coal Waste

Analysis. An insignificant amount of coal fines were observed on the rock ledge adjacent to the portal; however, no lump coal or development waste was observed. The natural outslope below the portal was devoid of coal fines, lump coal, or development waste.

Findings. The permittee has met this requirement.

Portal Seals

Analysis. Double seals have been installed by the permittee. MSHA has approved the portal seals (see letter from MSHA dated July 10, 1997. The outside seal was constructed as required. Backfilling material even if imported would not be held in place.

Findings. The permittee has met these requirements.

Geology/Subsidence, R645-301-600.

Analysis. Only entry mining development has taken place in the Channel Canyon breakout area.

Findings. No subsidence expected in the Channel Canyon breakout area. This is based on Annual Subsidence Surveys (reviewed 1996 report).

Hydrology, R645-301-700.

Analysis. The Hiawatha seam, in which the Channel Canyon breakouts are located, dips away from the breakouts at approximately 3°. Thus, drains have not been installed in the breakout seals. Therefore, no expected buildup of underground water contiguous to the sealed partials will take place.

The area when operation did not require sediment control.

Findings. Drains are unnecessary in the Channel Canyon breakout seals because underground will flow downgrade for the portal seals.

The reclaimed area does not require sediment control since no signs of surface runoff was observed and the area has an excellent stand of native vegetation.

Conclusion and Recommendation

Based on the Division findings, it is recommended that this Phase III bond release for the Channel Canyon breakouts be approved.