

**ADMINISTRATIVE COMPLETENESS REVIEW WORKSHEET
(R645-301-150)**

DATE: February 17, 1999
 REVIEWER(S): Wayne Western, Sharon Falvey, Paul Baker, Bob Davidson, Jim Smith
 APPLICANT: CO-OP Mining Company MINE NAME: Bear Canyon Mine
 FILE NO. ACT/015/025-98-1 #D

"Administratively Complete Application" means an application for permit approval or approval for coal exploration, where required, which the Division determines to contain information addressing each application requirement of the State Program and to contain all information necessary to initiate processing and public review.

Directions: The categories listed below correspond to the minimum requirements for information necessary to initiate processing and public review. If a category is checked the Applicant has met the Completeness requirement for that category. If a category is not checked, the Completeness requirements have not been met. The comments column will identify the deficiency and what is necessary to correct it.

		Comments
301-112	Identification of Interests <u> X </u>	
100	Applicant's Business Structure <u> X </u>	
210	Applicant's Name/Address/Phone <u> X </u>	
220	Resident Agent's Name/Address/Phone <u> X </u>	
230	Name/Address/Phone of AML Fees Payer <u> X </u>	
300	Corporate Structure & Ownership <u> X </u>	
400	Identify Other Mining Operations in US <u> X </u>	

500	Surface & Mineral Ownership	<u> X </u>	
600	Ownership Contiguous to Permit	<u> X </u>	The application shows owners of lands contiguous to the permit (including proposed) area, but it does not include their addresses. Consider administratively complete.
700	MSHA Numbers	<u> X </u>	Need to be included in the application.
800	Interest in Contiguous Lands	<u> X </u>	

301-113	Violation Information	<u> X </u>	No new information received; consider administratively complete.
100	Suspension or Revocation Information	<u> X </u>	
300	List of Violations - 3 Previous Years	<u> X </u>	

301-114	Right of Entry	<u> X </u>	There are errors (relatively minor) in the legal description and/or maps that should be corrected for the advertisement.
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301-115	Status of Unsuitability Claims	<u> X </u>	Hunting cabin is more than 300 feet from proposed operations.
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301-116	Permit Term	<u> X </u>	
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Comments

<p>301-117</p>	<p>....Insurance <u> X </u></p> <p>....Proof of Publication <u> X </u></p> <p>....Facilities and Structures Used in Common <u> X </u></p>	<p>Proof of publication will need to be submitted after publication. Errors in legal description in application will need to be corrected. Consider administratively complete.</p>
<p>301-118</p>	<p>Filing Fee <u> X </u></p>	<p>Not required.</p>
<p>301-123</p>	<p>Notarized Signature of Responsible Official <u> X </u></p>	
<p>301-130</p>	<p>Information Collection: Technical Data Accompanied by Names of Persons or Organizations that Collected and Analyzed the Data - Dates of Collections - and Analysis of the Data and Description of the Methodology Used to Collect and Analyze Data</p>	<p>Some baseline data is submitted without laboratory data sheets; Specifically lab sheets for WHR-2, WHR-3 and WHR-4, WHR-5 WHR-6, 16-7-24-3, 16-7-24-4 and 16-7-24-5 were not found. Consider incomplete.</p> <p>Names, titles, and qualifications for the person conducting the soil survey and specifics were not found and need to be provided.</p>

Comments

301-200	Soils _____	Incomplete.
211	Description of Pre-mining Soil Resources _____	An Order-1 soil survey is required to accurately describe the soil resources and needs to meet the standards of National Cooperative Soil Survey.
212	Soil Resource Protection Measures _____	<p>Soil protection measures for both topsoil and subsoil need to be evaluated using an Order-1 soil survey.</p> <p>A plan to separately remove, segregate and stockpile topsoil and subsoil is required.</p>
221	Prime Farmland Investigation _____	A Prime Farmland Investigation and determination needs to be provide by the NRCS.
222, 223	Soil Survey and Soil Characterization _____	<p>The NRCS survey of the proposed Wild Horse Ridge is not included in the submittal. Other than the names of four pits and illegible copies of laboratory data, no other specific information for the 1998 Order 1 survey is provided. Field notes, soil pit descriptions and locations need to be provided. Locations were not found on the soils map.</p> <p>Soil descriptions existing in the plan for past surveys have been removed and deleted and need to be retained.</p>
224	Substitute Topsoil Info (When Proposed) _____	Adequate soil salvage for reclaiming the entire proposed Wild Horse Ridge disturbed area needs to be ascertained before a determination can be made that substitute topsoil is not needed.

230	Operation Plan: Topsoil Handling/Removal/Storage	<p>Soil protection measures need to be evaluated using an Order-1 soil survey for salvaging topsoil and subsoil.</p> <p>Topsoil and subsoil need be saved, separately removed, segregated and stockpiled.</p> <p>A soil salvage map is needed. The exact location, size, dimension, etc of the topsoil stockpile is needed based on projected soil salvage volumes. Final configuration should be sized and shaped to show that enough room is available for projected soil salvage.</p>
240	Reclamation Plan: Soil Redistribution/Stabilization <u> X </u>	

Comments

301-300	Biology _____	See comments below.
320	Vegetation Information _____	<p>Vegetation productivity information for the Wild Horse Ridge area is not included and needs to be provided.</p> <p>The proposed disturbed area includes a riparian area: a wetland could be present possibly requiring a wetland delineation. The application needs to address wetlands.</p>
322	Fish and Wildlife Information _____	Information about threatened and endangered species (both for surface disturbances and for undermined areas), and information about bats inhabiting the area needs to be included.
323	Maps/Photos: Vegetation-Fish-Wildlife Areas _____	The new reference area discussed in the vegetation report is not shown on Plate 9-1 and needs to be mapped.

330	Operation Plan: Vegetation-Fish-Wildlife Protection _____	<p>The entire area is critical deer winter range, and some riparian habitat would be disturbed, but there is no protection/enhancement plan for these areas.</p> <p>The current MRP says eagle nests will be protected by not mining near cliffs, but the proposal shows mining under escarpments: the application needs a protection plan.</p> <p>The application needs a plan to propagate the canyon sweet vetch for planting at final reclamation.</p>
341	Reclamation Plan for Revegetation _____ X _____	
342	Fish & Wildlife Plan for Reclamation Phase _____ X _____	

301-400	Land Use and Air Quality _____	<p>Not administratively complete. The proposed activity may require an amendment to the Air Quality Approval Order. The applicant needs to show proof that the new disturbance does not require a revision to the existing order or, needs to submit the NOI to the Division of Air Quality.</p>
411	Pre-Mining Land Use Information (Includes Cultural Resources) _____	<p>The archaeological report from Dr. Juell does not analyze whether the Bear Creek Shelter is eligible for listing in the National Register of Historic Places. It does not show the area surveyed, so it is unknown whether the entire area proposed to be disturbed has been surveyed. The archaeological report needs to show the area surveyed and needs to cover new areas that would be undermined.</p>
412	Post-Mining Land Use Information _____ X _____	

		Comments
301-500	Engineering <u> X </u>	
510 and 520	General Description of Operation Plan: (Maps, Locations, Cross-Sections, Narrative, Descriptions & Calculations) <u> X </u>	Plate 2-4G presents surface facilities information. Plate 3-1 provides cross sections. Other information should be in approved PAP.
522	Coal Recovery Description <u> X </u>	Coal Recovery Description is included on pp 3-20 to 3-28.
523	Mining Methods <u> X </u>	Mining Methods are included on pg 3-13.
524	Blasting and Explosives Plan <u> X </u>	Blasting and Explosives Plan is included on pg 3M-3.
525	Subsidence Control Plan <u> X </u>	Subsidence Control Plan is included on pp 3C-4 to 3C-11.
526	Mine Facilities Description (Narrative, Plans, Maps) Including Existing Structures & Support Facilities <u> X </u>	There are no existing structures (a mine did exist at the site 30 years ago). There are no public roads in the new permit area pg 3-9. Existing and proposed structures are listed on pp 3A-2 to 3A-8. Facilities are provided on Plate 2-4F. Cross sections are provided on Plate 3-1.
527	Transportation Facilities (Including Plans & Maps) <u> X </u>	Wild Horse Ridge road pg 3-9. Primary roads cross sections are on Plate 3-1. Primary roads are shown on Plate 2-4F.
528	Coal Mine Waste Plans (Description & Designs) <u> </u>	On Page 3-6 the Applicant states that this information is presented in Section 3.5.8 of the amendment. There is no Section 3.5.8 in the amendment.

529	Management of Mine Openings (Design) _____	A reference was not found in the amendment.
531	General Plans for Structures <u> X </u>	Sediment pond general plans are on provided, pg 3-5.
532	Sediment Control <u> X </u>	See: Hydrology section for additional comments.
533	Impoundments _____	<p>On Page 3-5 the Applicant states that the slope stability analysis for the fourth pond (pond D) is given in Appendix 3-F Page 3F-32 and that the safety factor is 1.46.</p> <p>Appendix 3F is not in the amendment.</p> <p>The slope stability analysis in Amendment 3O does not have cross sections that show the location of Pond D.</p> <p>See: Hydrology section for additional comments.</p>

301-534	Roads (Plans, Drawings, Designs, & Specifications) <u> X </u>	<p>Wild Horse Ridge road information is on pg 3-9.</p> <p>Primary road cross sections are on Plate 3-1.</p> <p>Primary roads are shown on Plate 2-4F.</p>
535	Spoil <u> X </u>	Spoil handling is not addressed. The Division considers spoil information unnecessary, since spoil is usually associated with surface mining.
536	Coal Mine Waste _____	The Applicant did not state how coal mine waste (underground development waste) will be handled. On Page 3-6 the Applicant states that coal mine waste will be discussed in Section 3.5.8. However, there is no Section 3.5.8. in the PAP.
537	Regraded Slopes <u> X </u>	Spoil or underground development waste is not proposed to be retained in settled revegetated fill; therefore, the Applicant did not address this section.

<p>540 541-542</p>	<p>Reclamation Narrative, Maps and Plans _____</p>	<p>Reclamation cross sections for the Wild Horse Ridge area need to be provided.</p> <p>Plans to reclaim the Wild Horse Ridge (mine #3) area are given in Section 3.6.12 of the PAP.</p> <p>A timetable is included on pg 3-80. Pond D Reclamation is provided on pg 7-130.</p> <p>Plate 3-2G is a reclamation contour map for the Wild Horse Ridge area.</p>
<p>551</p>	<p>Casing and Sealing: Underground Openings <u> X </u></p>	<p>Casing and sealing of Underground Openings is found on pg 3-63.</p>
<p>553</p>	<p>Backfilling and Grading Description _____</p>	<p>The application needs to discuss how higwalls will be reclaimed.</p> <p>A backfilling plan is provided pg 3-111.</p> <p>The Wild Horse Ridge reclamation contour map is on Plate 3-2G.</p>

<p>301-600</p>	<p>Geology <u> X </u></p>	
<p>621</p>	<p>Description of Geology (Permit & Adjacent Area) <u> X </u></p>	
<p>622</p>	<p>Geologic Cross-Sections, Maps, and Plans <u> X </u></p>	
<p>630</p>	<p>Plans for Casing and Sealing Holes <u> X </u></p>	<p>No new bore holes are proposed.</p>

		Comments
301-700	Hydrology _____	Not considered complete.
721	Description of Hydrologic Resources: (Permit and Adjacent Area) _____	The PHC describes the previously mined area but confounds the information specific to the new lease area. Information from the northern mines in the adjacent areas is not addressed. WHR-6, 16-7-24-3, 16-7-24-4, and 16-7-24-5, springs that issue from the Star Point as referred to in the PHC lab sheets, are not found in baseline data. Well drill log information is not sufficient to determine distances between the coal seams, the top of the Star Point and the water elevations.
722	Cross-Sections and Maps: Subsurface Water - Surface Water - Monitoring Stations - Wells _____ <u>X</u>	Maps are included in the submittal. Some monitoring locations can not be found on the maps.
723	Sampling and Analysis _____	Some lab analysis sheets were not provided. See 301-130. Information shows the sampling and analyses did not meet holding times in some cases.
724	Baseline Information: Ground Water - Surface Water - Geology - Climatological & Supplemental; If Needed _____	Lab sheets for some baseline data are not included. Well log scales are not clear and related geologic information can not be discerned. References to color infrared photography illustrates linear features representing fractures are present but were not mapped. Infrared photography should be made available or the source should be referenced. BC-3 and BC-4 are proposed operational monitoring sites but no baseline information was found for these sites.
728	PHC Determination _____ <u>X</u>	Appendix 7-P includes a PHC for the Wild Horse Ridge lease additions. Information specific to the new lease area is difficult to discern from the pre-mined area within the PHC document.

730	General Operation Plan: Minimize Disturbance to Hydrologic Balance & Compliance with Clean Water Act <u> X </u>	Information adequate to initiate review is provided.
731	Ground and Surface Water Protection <u> X </u>	Information adequate to initiate review is provided.
732	Ground and Surface Water Monitoring <u> X </u>	Information adequate to initiate review is provided.

Comments

301-740	Plans and Designs: Operation and Reclamation Plan Sediment Control Measures <u> X </u> Siltation Structures <u> X </u>Sediment Ponds <u> X </u>Other Treatment Facilities <u> X </u> Diversions <u> X </u>Road Drainage <u> X </u>Impoundments <u> X </u>Discharge Structures <u> X </u>Disposal of Excess Spoil <u> X </u>Coal Mine Waste <u> X </u>Disposal of Non-Coal Mine Waste <u> X </u>Casing and Sealing of Wells <u> X </u>	 Siltation Structure designs are included in Appendix 7-H for reclamation ASCA's Sedimentation Pond Designs are provided in Appendix 7-F. N/A Appendix G contains Diversion Calculations for pad and road areas. Reclamation Diversion designs are included in Appendix 7-H for pad and road areas. An Excess Spoil site is not proposed. A Coal Mine Waste site is not proposed Disposal of Non-Coal Mine Waste is addressed in Chapter 3. Casing and Sealing wells is discussed in the existing permit.
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Comments

301-800	Bonding and Insurance	<u> X </u>	
820	Applicant: Have Adequate Bond at Permit Issuance	<u> X </u>	
830	Bond Estimate and Calculations Provided	<u> </u>	The Applicant did not give the Division a reclamation cost estimate for the Wild Horse Ridge facilities.
890	Certificate of Insurance Provided	<u> X </u>	

302-200	Special Categories of Mining	<u> X </u>	N/A
210	Experimental Practices Mining	<u> X </u>	N/A
220	Mountaintop Removal Mining	<u> X </u>	N/A
230	Steep Slope Mining	<u> X </u>	N/A
240	Auger Mining	<u> X </u>	N/A
250	In Situ Processing Activities	<u> X </u>	N/A

Comments

302-260	Coal Processing Plants (Not Located Within Permit Area of Mine)	N/A
270	Variances From Approximate Original Contour Restoration Requirements	No variance from approximate original contour is requested.
280	Variances for Delay in Contemporaneous Reclamation Requirement in Combined Surface and Underground Coal Mining Activities	N/A
290	Small Operator Assistance Program (SOAP)	N/A

302-300	Special Areas of Mining	N/A
301	Prime Farmland	N/A
302	Alluvial Valley Floors	A discussion concerning Alluvial Valley Floors that may be associated with Fish Creek was not provided to make a AVF determination for the adjacent area.