



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

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November 5, 2002

Wendell Owen, Mine Manager  
Co-Op Mining Company  
P.O. Box 1245  
Huntington, Utah 84528

Re: BTCA Area, Co-op Mining Co., Bear Canyon Mine, C/015/025-AM02F-1, Outgoing File

Dear Mr. Owen:

The above-referenced amendment has been reviewed. There is one deficiency that must be adequately addressed prior to approval. A copy of our Technical Analysis is enclosed for your information. In order for us to continue to process your application, please respond to this deficiency by November 29, 2002.

If you have any questions, please call me at (801) 538-5325 or Mike Suflita at (801) 538-5259.

Sincerely,

A handwritten signature in black ink that reads "Daron Haddock".

Daron Haddock  
Permit Supervisor

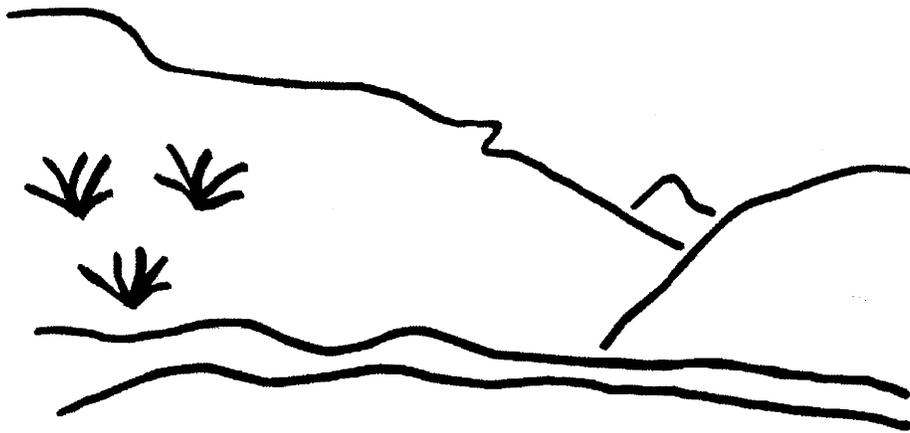
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Enclosure

cc: Price Field Office

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# State of Utah



## Utah Oil Gas and Mining

### Coal Regulatory Program

Bear Canyon Mine  
BTCA Area  
C/015/025-AM02F-1  
Technical Analysis  
November 5, 2002

TECHNICAL ANALYSIS

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## TECHNICAL ANALYSIS

The Division ensures compliance with the Surface Mining Control and Reclamation Act of 1977 (SMCRA). When mines submit a Permit Application Package or an amendment to their Mining and Reclamation Plan, the Division reviews the proposal for conformance to the R645-Coal Mining Rules. This Technical Analysis is such a review. Regardless of these analyses, the permittee must comply with the minimum regulatory requirements as established by SMCRA.

Readers of this document must be aware that the regulatory requirements are included by reference. A complete and current copy of these regulations and a copy of the Technical Analysis and Findings Review Guide can be found at <http://ogm.utah.gov/coal>

This Technical Analysis (TA) is written as part of the permit review process. It documents the Findings that the Division has made to date regarding the application for a permit and is the basis for permitting decisions with regard to the application. The TA is broken down into logical section headings which comprise the necessary components of an application. Each section is analyzed and specific findings are then provided which indicate whether or not the application is in compliance with the requirements.

Often the first technical review of an application finds that the application contains some deficiencies. The deficiencies are discussed in the body of the TA and are identified by a regulatory reference which describes the minimum requirements. In this Technical Analysis we have summarized the deficiencies at the beginning of the document to aid in responding to them. Once all of the deficiencies have been adequately addressed, the TA will be considered final for the permitting action.

It may be that not every topic or regulatory requirement is discussed in this version of the TA. Generally only those sections are analyzed that pertain to a particular permitting action. TA's may have been completed previously and the revised information has not altered the original findings. Those sections that are not discussed in this document are generally considered to be in compliance.

Page 2  
C/015/025-AM02F-1  
November 5, 2002

**TECHNICAL ANALYSIS**

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**INTRODUCTION**

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**INTRODUCTION**

On May 14, 2002 the Division received an amendment to remove artificial silt control measures and only use vegetation in three BTCA areas. On August 29, 2002 the Division returned a Technical Analysis to the Operator with one deficiency. On October 15, 2002 the Division received a revised amendment. This Technical Analysis is a review of that latest submittal. There is one deficiency.

Page 4  
C/015/025-AM02F-1  
November 5, 2002

**INTRODUCTION**

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OPERATION PLAN

## OPERATION PLAN

### HYDROLOGIC INFORMATION

Regulatory Reference: 30 CFR Sec. 773.17, 774.13, 784.14, 784.16, 784.29, 817.41, 817.42, 817.43, 817.45, 817.49, 817.56, 817.57; R645-300-140, -300-141, -300-142, -300-143, -300-144, -300-145, -300-146, -300-147, -300-147, -300-148, -301-512, -301-514, -301-521, -301-531, -301-532, -301-533, -301-536, -301-542, -301-720, -301-731, -301-732, -301-733, -301-742, -301-743, -301-750, -301-761, -301-764.

#### Analysis:

##### Sediment Control Measures

The amendment proposes to revise BTCA areas D, and F to use plant cover as the sediment control method and eliminate all artificial erosion control measures. Justification for this is contained in Attachment A, Vegetation Monitoring for Erosion Control, a report by Mt. Nebo Scientific, Inc. This report details the types of plant species in the BTCA areas and compares them to a reference area. Included are Trees & Shrubs, Forbs, and Grasses for each area. Also included are statistical analyses comparing the areas to the reference area. Basically, the percent cover in areas D, and F are greater than the reference area. Also, there is considerable plant diversity in the areas. The report does a credible job of justification. In addition, a field visit on August 29, 2002 showed areas D and F can be revised as proposed in the amendment. Both areas have revegetated well and no rills or gullies are apparent.

The cover letter indicates, "We are no longer trying to remove the erosion controls for BTCA Area C." The amendment submittal contains copies of page 7K-3 only. The argument for withdrawal of Area C is contained on page 7K-4. Thus, page 7K-4 should be the one to be replaced in this revised amendment. This was discussed with the Operator and they concur. The Operator needs to submit a revised page 7K-4 and include clean copies of pages 7K-3, 7K-4, and 7K-5.

The page, 7O-45 explaining culvert C-36 was not used is acceptable and desirable.

#### Findings:

The amendment does not meet minimum regulatory requirements. Accordingly, the Permittee must address those deficiencies as found within this Technical Analysis and provide the following, prior to approval, in accordance with the requirements of:

**R645-301-121.200**, The Operator needs to submit a revised page 7K-4 and include clean copies of pages 7K-3, 7K-4, and 7K-5.