

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

June 12, 2006

TO: Internal File

THRU: Wayne Hedberg, Permit Supervisor
Jim Smith, Team Lead

FROM: Priscilla Burton, CPSSc, Environmental Scientist III

RE: Loadout Expansion, Task ID # 2469, CO-OP Mining Company, Bear Canyon Mine, C/015/025

SUMMARY:

This application to expand the loadout area at the Bear Canyon will increase the disturbed area by 0.05 acres (Table 2-3). The area to be cut is the slope between the coal storage yard and the primary access road in reclamation area TS 5. This slope has been designated as a source of substitute topsoil under R645-301-233.100. Therefore, the operation plan must describe salvage and segregation of the substitute topsoil.

The plan reduces the volume of salvageable substitute topsoil from the TS-5 area by 395 cubic yards (Table 2-3). Approximately 1,000 cu yds of fill from TS-5 is slated for use during reclamation of Wildhorse Ridge area TS-17 (page 5I-13 and 5K-7). Appendix Q describes the loadout expansion. Figure 1 indicates that a 20 ft cut will be made into the substitute topsoil slopes (see Plate 2-3C).

TECHNICAL ANALYSIS:

ENVIRONMENTAL RESOURCE INFORMATION

Regulatory Reference: Pub. L 95-87 Section's 507(b), 508(a), and 516(b), 30 CFR 783., ET. al.

OPERATION PLAN

TOPSOIL AND SUBSOIL

Regulatory Reference: 30 CFR Sec. 817.22; R645-301-230.

Analysis:

Figure 1 of the application and Plate 2-3C of the MRP indicate that the slopes to be cut have been designated as substitute topsoil. The Permittee must include in the operation plan, the removal and stockpiling of all available substitute topsoil from this location. A storage location separate from the Wildhorse Ridge stockpile must be designated, because the Wildhorse Ridge stockpile has reached its capacity.

Findings:

The information provided is not adequate to meet the requirements of this section of the regulations. Prior to approval the applicant needs to provide the following in accordance with:

R645-301-232.200, the Permittee must describe the removal and segregation (stockpiling) of all substitute topsoil from the area to be disturbed during the loadout expansion.

RECLAMATION PLAN

BACKFILLING AND GRADING

Regulatory Reference: 30 CFR Sec. 785.15, 817.102, 817.107; R645-301-234, -301-537, -301-552, -301-553, -302-230, -302-231, -302-232, -302-233.

Analysis:

General

Plates 2-3 C, E & G illustrate the location of reclamation areas TS 5, TS 7, TS 8, , TS 15 and TS 17 under discussion.

- TS 8 will require 952 cu yds of imported fill from TS 5.
- The Blind Canyon tunnel area (TS 15) was backfilled with 1,000 cu yds of soil from the Wild Horse Ridge TS 17 area.
- Additional material generated from the Wild Horse Ridge development was hauled to TS-7 and TS-8 for reclamation of those areas. So the use of TS 5 soils may have been reduced even further. If so, the cut/fill balance plan must reflect the change.

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Thus, a 1,000 cu yd deficit was created in TS 17. The cuts of TS 17 will be partially filled with 1,000 cu yds of material from the TS 5 (page 5I-13 and 5K-7). The plan must address the cut/fill balance of TS 17 as a result of using fill from TS 5 for construction of the retaining walls.

Findings:

The information does not meet the requirements of the Backfilling and Grading Reclamation plan . Prior to approval, the Permittee must provide the following in accordance with:

R645-301-121.200, The plan must address the cut/fill balance of TS 17 as a result of using fill from TS 5 for construction of the retaining walls.

POSTMINING LAND USES

Regulatory Reference: 30 CFR Sec. 784.15, 784.200, 785.16, 817.133, R645-301-412, -301-413, -301-414, -302-270, -302-271, -302-272, -302-273, -302-274, -302-275.

Analysis:

The main access road will remain in place for the post-mining land use. The application indicates that the road will remain as part of the County road system. There is a reference to an agreement between the county and the mine (page 5F-5). The county road agreement must be included in the MRP, because in addition to establishing whether the road remains, this document is important for the purposes of defining reclamation cut/fill balances.

Findings:

The information provided is not adequate to meet the requirements of this section of the regulations. Prior to approval the applicant needs to provide the following in accordance with:

R645-301-412.200, The county road agreement (references on page 5F-5) must be included in the MRP, because in addition to establishing whether the road remains, this document is important for the purposes of defining reclamation cut/fill balances

RECOMMENDATIONS: