

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

August 17, 2007

TO: Internal File

FROM: James D. Smith, Environmental Scientist, Team Lead *DS 09/07/07*

RE: Wild Horse Ridge Tank Seam As-Built, Co-op Mining Co., Bear Canyon Mine, C/015/0025, Task ID #2823

SUMMARY:

Construction of the Wild Horse Ridge roads and portals produced results that did not exactly match pre-construction drawings and specifications. This amendment revises and corrects a number of plates and tables to more closely match what is actually on the ground.

This As-Built amendment was originally submitted as part of the Wild Horse Ridge Tank Seam As-Built/Snow Storage amendment, received May 11, 2006 to mitigate N06-46-2-2: it was assigned Task # 2523. Because that initial submittal was found deficient, the Permittee revised and resubmitted the amendment: the Division received the revision on October 2, 2006 and assigned it Task # 2588. During the Technical Review of that second submittal it became evident that the two tasks - the Snow Storage amendment to abate the NOV and the Wild Horse Ridge As-Built amendment - needed to be separated in order to expedite the abatement and termination of the NOV. The Division received the third Snow Storage submittal on October 4, 2006. This third iteration, which addressed only the snow storage issue, was found sufficient for incorporation into the MRP (Task # 2669). A letter of conditional approval for the Snow Storage amendment was sent November 14, 2006, the Division received clean copies December 11, 2006, and the final approval letter was dated December 12, 2006.

The other half of the third submittal of the Wild Horse Ridge As-Built/Snow Storage amendment, which addressed only the As-Built deficiencies, was submitted October 10, 2006 (received October 13, 2006). The information was scanned into the Division's electronic file system; however, the paper copy was somehow lost and the amendment was not given a Task number and was not assigned for technical review. An inquiry from the Permittee as to the status of this amendment brought the oversight to the Division's attention. A copy of the submittal was regenerated from the scanned file on February 23, 2007, the amendment was assigned task #2753, and a deficiency letter was sent April 13, 2007.

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On May 24, the Division received the Permittee's response and assigned it Task # 2811. Several remaining deficiencies were identified in a letter dated June 28, 2007: the deficiencies in the Hydrology section were simple formatting errors. The Division received the Permittee's response July 6, 2007 and designated it Task # 2823. In this latest submittal, the Permittee has satisfactorily addressed all hydrology deficiencies.

TECHNICAL ANALYSIS:

GENERAL CONTENTS

PERMIT APPLICATION FORMAT AND CONTENTS

Regulatory Reference: 30 CFR 777.11; R645-301-120.

Analysis:

The Permittee corrected the pagination errors at pp. 7-114 and 7-115 and pp. 7-117 and 1-118. Page 7-115 shows that it is D-37U, rather than C-37U, that reports to D-31U. Page 7-118 has the revision showing that AD-19 reports to C-34U.

The Permittee matched the volume of discharge of C-23U indicated in the table on p. 7G-50 with that on p. 7G-77.

The Permittee included all pages indicated on the C2 form, specifically, 5K-14 through 5K-21 and 5K-21A.

Pages 6C-31 and 6C-32 are listed on the C2. These pages are in the submittal but previously were not numbered. In this July 6 submittal, they have been numbered.

Finding:

Permit Application Format and Contents are sufficient to meet the requirements of the Coal Mining Rules.

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:

Diversions: Miscellaneous Flows

Just above the coal storage bin area (BTCA Area W), culvert C-26U has two inlets, one for the ephemeral stream channel and the other for ditch D-28U.

In Table 7-24, AU-27 is included in the sub-drainages reporting to D-33U, but AU-27 does not report to this ditch. Subdrainage AU-29 reports to two ditches, D-33U and D-35U, and the 0.20 cfs runoff from AU-29 has been included in the design calculations for both ditches. These factors result in excess capacity in the design of D-33U and D-35U, so these ditches easily meet the requirements of the Coal Mining Rules.

Table 7-25 indicates that C-32U either was never built or has been abandoned. On Plates 7-1G and 7-5a, culvert C-32U has been labeled "Abandoned In Place".

Ditch D-24U starts above Catch Basin 2. It is close to and parallel to D-25U for a short distance, but D-25U reports to Catch Basin 2 while water flowing in D-24U eventually reaches Bear Creek. The separation between D-24U and D-25U is shown on Plate 7-1G.

Sediment Control Measures

Catch Basin 2 is designed for total containment. As shown on Plate 7-1G, D-25U and BTCA W (indicated by the hatched pattern) drain to Catch Basin 2 and do not drain to D-24U.

Findings:

Operation Plan Hydrologic Information in this amendment meets the requirements of the Coal Mining Rules.

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RECOMMENDATIONS:

The proposed amendment should be approved.

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