



State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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January 3, 1989

TO: Susan C. Linner, Permit Supervisor

FROM: Randy Harden, Reclamation Engineer *REH*

RE: Five-Year Permit Renewal Review, Deficiency Review, Genwal Coal Company, Crandall Canyon Mine, ACT/015/032, Folder #2, Emery County, Utah

SUMMARY:

Initial review regarding Genwal's five-year permit renewal was made on October 13, 1988. Only those sections which were found to be deficient or technically inadequate during that review are noted below.

In accordance with the requirements of UMC 800.11, after permit approval but prior to issuance of permit, bond must be issued to the Division. Information previously requested in regard to mass balance and bonding calculations has not been submitted by the operator. Until such time as this information is complete, a revised bond amount cannot be determined by the Division.

UMC 800 Bonding - JRH

This section is not considered adequate.

The cost estimate provided by the operator does not reflect modifications and changes in the mining and reclamation plan on the existing or proposed facilities. Such changes in the facilities include the addition of a portal, relocation and redesign of the bathhouse facilities, and, additional proposed loadout facilities.

The operator needs to revise the cost estimate found as Item 3-12 in the mining and reclamation plan. Additionally, the mass balance as required in UMC 817.101 must also be completed in order to determine the cost estimate complete.

A determination of the bond amount cannot be made until such time as the operator submits an updated cost estimate.

UMC 817.71 Disposal of Excess Spoil and Underground Development
Waste: General Requirements - JRH

UMC 817.72 Disposal of Underground Development Waste and Excess
Spoil: Valley Fills - JRH

UMC 817.73 Disposal of Underground Development Waste and Excess
Spoil: Head-of-Hollow Fills - JRH

UMC 817.74 Disposal of Underground Development Waste and Excess
Spoil: Durable Rock Fills - JRH

This section is not considered to be adequate.

The operator has indicated that the response to this section is in progress. No information has been submitted to meet the requirements of this section. Previous comments are as listed below:

The operator has referenced these sections of the regulation to Section 3.3.9 of the MRP.

The operator has not conducted a mass balance of the site in order to determine whether or not there is an excess of spoil or mine development waste on the site in conjunction with reclamation. It is evident that due to the allowance of the Forest Service road in conjunction with post-mining facilities, there will most likely be a shortage of materials on the site, in order to perform reclamation work. The operator needs to address the requirements of this section in conjunction with the requirements of UMC 817.101 Backfilling and Grading.

The operator has indicated that underground development waste will be returned to underground workings in this section, however, no determination as to the handling of mine development waste in conjunction with the development and construction of the surface facilities has been accomplished in the MRP.

UMC 817.101 Backfilling and Grading: General Requirements - JRH

This section is not considered to be adequate.

This section was not addressed in the operator's response. The following deficiencies are still found within the MRP:

The operator has referenced this section of the regulations to Part 3.5.4 of the MRP and plates 3-1 and 3-5.

The operator has included in the MRP, cut and fill calculations for portions of the site to be reclaimed. These calculations are found in Item 3-12. However these calculations indicate a shortage of material of approximately 10,000 cubic yards of fill required for the site.

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No reference as to the mass balance of the materials required for backfilling and grading is made in the MRP. The operator must provide earthwork calculations and a mass balance for the backfilling and grading to be accomplished on the site. The operator shall include suitable cross sections indicating the pre-mining, the mining, and the post-reclamation sections of the site in order to show the cut and fill requirements and in order to determine whether or not the operator has met approximate original contour requirements for the site.

Earthwork calculations shall also include a mass balance for topsoil requirements on the site. These, and the general earthwork calculations, can be provided as part of the bonding calculations which will further require equipment selection and productivity calculations for the backfilling and grading in order to determine the adequacy of the reclamation bond.

In those areas where complete reduction of highwalls along cuts, pads, portals and embankments is not accomplished, the operator shall be required to provide justification for the remaining highwall. This justification shall include, but not be limited to, stability analysis of the highwall and the fill material to be backfilled.

cc: B Team
BT18/32-34