



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

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January 27, 1994

Mr. Larry Johnson, Engineer
Genwal Coal Company
P. O. Box 1201
Huntington, Utah 84528

Re: Amendment 93G and NOV N93-43-1-1 abatement, Genwal Coal Company, Crandall Canyon Mine, ACT/015/032, Folder #3, Emery County, Utah

Dear Mr. Johnson:

On November 12, 1993, Notice of Violation N93-43-1-1 was terminated based on information provided by Genwal which met the NOV abatement requirements. Although the information which was provided was deemed adequate to terminate the NOV, it was not considered acceptable for amending the Crandall Canyon Plan. Our November 12, 1993 correspondence indicated that proposed changes involving C-3, C-4, C-5, C-10, DD-2 and DD-7 and the new Plate 7-5a were deficient and were not approved. Only those changes associated with culvert C-9 and the abatement of the NOV were approved.

In order to keep your plan current and to eliminate confusion with the NOV abatement and the other proposed changes, Genwal must submit (as requested in the November 12, 1993 correspondence) 12 copies of the approved abatement information pertaining to culvert C-9 found on page 28 Appendix 7-7 and page 17, Appendix 7-11. Please provide this by February 25, 1994, at which time it will be incorporated into your plan and distributed to other agencies.

In your letter dated December 1, 1993 you requested that we relook at the proposed changes since our initial review had been based on an outdated map. You were correct in pointing out that outdated information was being reviewed, and the Division subsequently located the appropriate plan information (Plate 7-5A, revision 5/4/93) and conducted a 2nd review of Genwal's proposal with the benefit of that information.

The results of that review indicate that the proposed changes are still not acceptable for amending your plan. Following is a list of deficiencies which have been identified.

- 1) Important information has been deleted from Plate 7-5A. This includes important cross-sections, legend, north arrow, elevation contour labels, and certification statement.



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- 2) Drainage designs in Appendix 7-7 conflict with designs in Appendix 7-11.
- 3) Watershed areas are not clearly identified.
- 4) Slope and length of culverts is not provided.
- 5) Flow depth of velocity of flow is not given for Ditch DD-7.

In a submittal completely separate from the one asked for above, Genwal must provide corrections to the deficiencies identified in the proposed amendment 93G. Please provide an adequate response by no later than February 25, 1994. If you have any question with regard to these requirements please call me or Sharon Falvey. I have enclosed a copy of Sharon's review memo which may help you in responding to the deficiencies.

Sincerely,



Daron R. Haddock
Permit Supervisor

Enclosure

cc: S. Falvey
J. Helfrich
AMEND93G.GEN



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January 13, 1994

TO: File

THRU: Daron Haddock, Permit Supervisor

FROM: Sharon Falvey, Senior Reclamation Specialist *SJF*

RE: N-93-43-1-1 Abatement Submitted October 19 1993, Second Review Request December 2, 1993, Genwal Coal Company, Crandall Canyon Mine, ACT/015/032, Folder #2, Carbon County, Utah

Subject:

The Division received Genwal's Response to N93-43-1-1 on October 19, 1993. The submittal included revised Surface Runoff Control Plate 7-5 A, designs for Culvert C-9 and C-10, and re-routing of culverts C-5, C-7 and C-3. The operator has proposed routing culvert C-5 (currently routed to C-4) to ditch DD-7 and culvert C-3. The operator has removed Ditch DD-2 from the map.

The operators' submitted amendment was determined incomplete and was approved for page 28, Appendix 7-7 and page 17, Appendix 7-11 for the information relating to culvert C-9 to abate violation N93-43-1-1. The response memo requested the operator to submit 12 copies of the approved information to be submitted by December 10, 1993. On December 2, 1993 the operator submitted a request that the Division re-review the proposal. The request was based on the review being done by the Division, according to a plate found in the file copy which was not the most recently approved map. It is probable that the latest approved map dated 5/4/93 has not been reviewed for the Hydrology regulation requirements.

Analysis:

The operator has revised the surface runoff Control Map Plate 7-5A. This area was recently surveyed and the map approved as a result of a violation issued in 1992. In the revision, the operator has decreased the scale of the map from 1" = 50' to 1" = 40'. The operator also increased the previously described undisturbed areas within the site by 0.05 acres and 0.01 acres. The Disturbed area boundary appears to have changed configuration, and some cross section surveys were re-located or removed (surveyed cross sections, such as M-M' and K-K', are no longer shown on the plate). Some important



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information is omitted that should have remained on the map such as; a legend describing the map symbols, a north arrow and, elevation contour labels. The submitted plate is stamped certified but does not have an accompanying signature or certification statement.

Although the presented culverts may be adequately sized according to the reference to appendix 7-11, the operator has presented an additional design amendment in Appendix 7-7 dated 3/26/92. Information contained within these two appendices is confusing and inconsistent. Information in DD-2 which no longer pertains to the proposed submittal should be removed or other wise clarified. If the designs submitted in section 7-7 superseded 7-11 the operator should propose that 7-11 be removed and pertinent information be replaced in section 7-7.

The operator refers to the design flow of DD-A on page 7 of Appendix 7-11. It appears the operator is actually referring to DD-4 on that page. It appears the drainage to that ditch has changed, since ditch DD-2 is no longer shown on the submitted Plate 7-5A. Additionally, watershed areas are not clearly identified. For instance WSDD-11 shown on Plate 7-5C is shown to be WS-5 on Plate 7-3.

Additional missing information includes the slope and length of culverts used in the designs (the operator often refers to the up stream ditch slope but, not the culvert slope). Watershed areas are not clearly identified in the designs and time of concentrations do not correlate between the designs. No flow depth or velocity of flow is indicated for Ditch DD-7. The operator should also include the new culverts on the summary tables presented within the plan.

Recommendation:

After further review of the operators submittal, it appears the operator needs to provide clarification between applicable portions of drainage designs in Appendix 7-7 and Appendix 7-11. This same information is carried through to the LBA#9 submittal. There exists more than one peak event designed for some of the ditches and culverts included in the plan. It is recommended this application be denied and a Division Order issued to clarify information submitted in Appendices 7-7 and 7-11. The plan could be clarified through the review of the LBA#9 submittal however, it is recommended the Division Order be issued because the operator may not proceed with the LBA addition within a reasonable time period. The operator should be requested to submit 12 copies of the approved information related to page 28, Appendix 7-7 and page 17, Appendix 7-11 for the information relating to culvert C-9 only.