



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

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February 3, 1999

TO: File

THRU: Daron Haddock, Permit Supervisor *DH*

FROM: Wayne H. Western, Senior Reclamation Specialist *WHW*

RE: Highwalls, Genwal Resources, Crandall Canyon Mine, ACT/015/032, File #2
Emery County, Utah

SUMMARY:

On February 3, 1999, Gary Grey and Wayne Western discussed highwall elimination at the Genwal Mine. We agreed that the MRP would be updated to show how the highwalls would be completely reclaimed.

Background:

In a letter date March 6, 1997, the Permittee responses to the highwall survey sent by the Division. The Permittee's response to the survey is as follows:

1. Identify each highwall used in connection with the mine and provide a description of its location and extent. (Reference maps where the highwall is shown)

One highwall exists within the mine portals. Four entries enter the coal seam in this area. No other portals or highwalls exist. See attached map. The attached map is from Plate 5-3, Surface Facilities in the approved MRP. The location of the mine is in Section 5, T15S, R7E, SLBM.

2. Provide verification of highwall and adjacent cutslope creation dates. (At a minimum determine whether it was created before of after May 3, 1978)

The mine was begun in the early 1940's. Production over the years was erratic. The mine was shut down. In 1983 the mine was reopened, using the existing portals & entries.

3. Provide a reference to the Mining and Reclamation Plan (MRP) which discusses

the final reclamation and elimination or retention of the identified highwalls. If no reference exists, state "none."

No reference to elimination of highwalls exist in the approved MRP. Plans exist in the Crandall Creek Culvert Amendment to fully eliminate this area however.

In a letter dated March 5, 1998 the Division notified Genwal Resources Inc. that the MRP for the Crandall Canyon Mine did not adequately address the following highwall issues:

4. Those situations where the permits show parts of the post May 3, 1978, highwalls will be retained contrary to the requirements of Utah's program.
5. Other situations where the permits are not clear as to what extent pre and post May 3, 1978, highwalls will be eliminated.

Analysis:

In a letter dated April 17, 1998 to the Division the Permittee states that the MRP has been amended and that the highwall issues have been resolved. The Division reviewed the MRP in January 1999. The cross section on Plate 5-17A and the reclaimed surface topography showed on Plate 5-16 show that the highwalls will be reclaimed. However, the Permittee did not address all the regulations that deal with reclaiming highwall and some of the information in the MRP was incomplete. The highwall defects are as follows:

1. In Section 5.53 of the MRP Removal or Reduction of Cut Slopes the Permittee refers to the area above the portals as a cutslope instead of a highwall.
2. The requirements that the reclaimed highwall has a safety factor of at least 1.3 are not addressed. (R645-301-553.100)
3. The Permittee did not state in the MRP if any highwall remnants will remain as allowed in previously or continuously mined areas. (R645-301-553.600)

On February 3, 1999, Wayne Western and Gary Gray discussed highwall elimination at the Crandall Canyon Mine. During the meeting both sides agreed that the highwalls would be completely eliminated during reclamation. The fill needed to reclaim the highwalls would come from the fill used to construct the pad expansion.

Both sides also agreed that the MRP needed to be amended with respect to highwall elimination. Gary Gray agreed to amend the MRP with respect to:

1. The Permittee would refer to the area above the portals as highwalls instead of cutslopes. See Section 5.53 of the MRP

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2. The Permittee would show that the reclaimed highwall areas had a safety factor of at least 1.3. See R645-301-553.130
3. The Permittee would state that all highwalls would be eliminated. No highwall remnants would be remaining after final reclamation, even highwalls that were created prior to May 3, 1978.

Gary Grey said that he would try to amend the MRP within the next month. The Division will consider the highwall issues resolved if the Permittee amends the MRP as describe above.

Findings:

The Permittee did not adequately address the highwall regulations for the Crandall Canyon Mine. The Permittee must address the following:

R645-301-121.200. The MRP does not clearly state what areas are highwall or cutslopes. In Section 5.53 of the MRP the Permittee refers to the area above the portals as a cutslope instead of a portal.

R645-301-553.130. The Permittee did not address the requirement that all reclaimed highwalls must have a safety factor of at least 1.3.

R645-301-553.600. The Permittee did not address this section. The Permittee must state whether or not any highwall remnants will remain after reclamation as allowed by the provisions for previously mined areas (PMA) or continuously mined areas (CMA).