



GARY R. HERBERT
Governor

SPENCER J. COX
Lieutenant Governor

State of Utah

DEPARTMENT OF NATURAL RESOURCES

MICHAEL R. STYLER
Executive Director

Division of Oil, Gas and Mining

JOHN R. BAZA
Division Director

July 12, 2018

Karin Madsen, Resident Agent
Genwal Resources, Inc.
P.O. Box 910
East Carbon, Utah 84520-0910

Subject: Update Plate 7-3, Genwal Resources, Inc., Crandall Canyon Mine, C/015/0032,
Task #5692

Dear Ms. Madsen:

The Division has reviewed your application. The Division has identified deficiencies that must be addressed before final approval can be granted. The deficiencies are listed as an attachment to this letter.

The deficiencies authors are identified so that your staff can communicate directly with that individual should questions arise. The plans as submitted are denied. Please resubmit the entire application by no later than August 24, 2018.

If you have any questions, please call me at (801) 538-5325.

Sincerely,

Daron R. Haddock
Coal Program Manager

DRH/sqs
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Technical Analysis and Findings

Utah Coal Regulatory Program

PID: C0150032
TaskID: 5692
Mine Name: CRANDALL CANYON MINE
Title: UPDATE PLATE 7-3

Summary

The Division of Oil, Gas and Mining (DOGM) received an amendment to the Crandall Canyon Mine's Mining and Reclamation Plan (MRP). Genwal Resources, LLC (the Permittee) submitted a revised Plate 7-3, Crandall Canyon Mine Sediment Pond AS-BUILT (Plate 7-3). The currently approved Plate 7-3 depicts the installation of three sediment markers in the primary sediment pond for the mine site. In addition, Plate 7-3 provides a schematic of the sediment markers themselves. The Permittee proposes the elimination of two of the three sediment markers and has removed the as-built schematic.

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Operation Plan

Hydrologic Siltation Sedimentation

Analysis:

The amendment does not meet the State of Utah R645 requirements for Siltation Structures: Sedimentation Ponds.

The Division of Oil, Gas and Mining (DOGM) received an amendment to the Crandall Canyon Mine's Mining and Reclamation Plan (MRP). Genwal Resources, LLC (the Permittee) submitted a revised Plate 7-3, Crandall Canyon Mine Sediment Pond AS-BUILT (Plate 7-3). The currently approved Plate 7-3 depicts the installation of three sediment markers in the primary sediment pond for the mine site. In addition, Plate 7-3 provides a schematic of the sediment markers themselves.

The Permittee proposes the elimination of two of the three sediment markers and has removed the as-built schematic. The schematic of the sediment marker provides the elevations for the 60% sediment cleanout level as well as the maximum sediment cleanout elevation (7,769.0' and 7,770.0' respectively). The respective elevations were to be identified with color spray paint on the sediment markers (red, yellow and green from top to bottom). The top of the green spray paint was to denote the 60% sediment cleanout elevation. The top of the yellow section of the sediment marker identified the maximum cleanout elevation.

What's become apparent is that due to the harsh winter conditions and freezing snow/ice that accumulates in the primary sediment pond, the paint on the markers gets rubbed off. The Permittee has indicated that re-establishing the painted intervals on the sediment markers is cumbersome and difficult to do.

While DOGM understands why the Permittee would want to remove two of the three sediment markers due to the time and expense of maintaining them, the sediment markers provide a useful and immediate ocular method for determining the accumulated sediment levels in the pond during inspections (without the use of survey equipment) and thus

identifying when maintenance of the sediment pond is necessary.

Due to the relatively large size of the primary sediment pond, DOGM would be comfortable with the utilization of two sediment markers in order to ascertain accumulated sediment levels in the pond, but feels one sediment marker would be inadequate. The utilization of one sediment marker could very easily under- or over-estimate the amount of accumulated sediment in the pond.

The Permittee must revise Plate 7-3 to clearly identify the locations of at least two sediment markers. In addition, Plate 7-3 must identify how the sediment markers will be constructed/installed in order to ascertain the 60% and 100% accumulated sediment levels by an ocular estimate during an inspection.

Deficiencies Details:

The amendment does not meet the State of Utah R645 requirements for Siltation Structures: Sedimentation Ponds. The following deficiency must be addressed prior to final approval:

R645-301-731, -732 and -732.100: The Permittee must revise Plate 7-3 to clearly identify the locations of at least two sediment markers. In addition, Plate 7-3 must identify how the sediment markers will be constructed/installed in order to ascertain the 60% and 100% accumulated sediment levels by an ocular estimate during an inspection.

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