



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 27, 2018

Tony Welch, Resident Agent
Castle Valley Mining, LLC
P.O. Box 475
Huntington, Utah 84528

Subject: Determination of Administrative Completeness, Castle Valley Waste Rock Site, Castle Valley Mining, LLC, C/015/0036, Task #5721

Dear Mr. Welch:

The Division has completed a review of the information you submitted on July 5, 2018 for permitting the Castle Valley Waste Rock site. This application is considered to be administratively complete. A copy of our review worksheet is enclosed for your information and records.

A technical review of your plan has been initiated. Technical deficiencies will be forwarded to you as reviews are completed. The Division will also coordinate with other agencies and incorporate their comments into our review process. Issues raised will need to be resolved prior to permit issuance.

At this time you should publish a Notice of Complete Application for adding Castle Valley Waste Rock site as a separate mining operation as required by R645-300-121. A copy of the publication affidavit should be sent to the Division as soon as it is available. You should also insure that a copy of the application is on file at the appropriate County Courthouse. The Division will complete a technical analysis, which must find that your application is technically complete. We anticipate that additional information may be necessary to make your application technically complete and look forward to working with you throughout the permitting process.

Please call if you have any questions. Thank you for your help in the permitting process.

Sincerely,

Daron R. Haddock
Coal Program Manager

DRH/sqs
Enclosure
O:\015036.CVWR\WG5721 APPLICATION\ADMCOMP.DOC



**ADMINISTRATIVE COMPLETENESS REVIEW WORKSHEET
(R645-100)**

DATE: July 27, 2018

REVIEWER(S): Suzanne Steab, Joe Helfrich, Keenan Storrar, Daron Haddock, Justin Eatchel, Priscilla Burton

APPLICANT: Castle Valley Mining, LLC

MINE NAME: Castle Valley Waste Rock **FILE NO.:** C/015/0036

"Administratively Complete Application" means an application for permit approval or approval for coal exploration, where required, which the Division determines to contain information addressing each application requirement of the State Program and to contain all information necessary to initiate processing and public review.

Directions: The categories listed below correspond to the minimum requirements for information necessary to initiate processing and public review. If a category is checked the Applicant has met the Completeness requirement for that category. If a category is not checked, the Completeness requirements have not been met. If a category is Not Applicable, enter NA in check box. The comments column will identify the deficiency and what is necessary to correct it.

Comments

			Comments
301-112	Identification of Interests	<u>X</u>	
100	Applicant's Business Structure	<u>X</u>	
210	Applicant's Name/Address/Phone	<u>X</u>	
220	Resident Agent's Name/Address/Phone	<u>X</u>	
230	Name/Address/Phone of AML Fees Payer	<u>X</u>	
300	Corporate Structure & Ownership	<u>X</u>	
400	Identify Other Mining Operations in US	<u>X</u>	
500	Surface & Mineral Ownership	<u>X</u>	
600	Ownership Contiguous to Permit	<u>X</u>	
700	MSHA Numbers	<u>X</u>	
800	Interest in Contiguous Lands	<u>X</u>	

301-113	Violation Information	<u>X</u>	
100	AVS Violation Evaluation	<u>NA</u>	
200	Suspension or Revocation Information	<u>X</u>	
300	List of Violations - 3 Previous Years	<u>X</u>	One violation has been issued within the last three years, # 21177, it has been terminated effective 9/22/2016.

301-114	Right of Entry	<u>X</u>	<p>The application incorrectly identifies DOGM permit #0070045 on page 1-4. The application incorrectly identifies the legal description of the permit area on p. 1-8. i.e. It should read Beginning at the Northeast corner of Section 6. These errors should be corrected before public notice.</p> <p>A temporary right of entry agreement between Pacificorp and Castle Valley Mining LLC is included in App. 1-1 of the application.. The effective date is 6/11/2018.</p>
---------	----------------	----------	---

301-115	Status of Unsuitability Claims	<u>X</u>	There are no unsuitability claims on this site. It is currently permitted as a waste rock site by PacifiCorp.
---------	--------------------------------	----------	---

301-116	Permit Term	<u>X</u>	The permit will be issued for a term of five years with right of successive renewal.
---------	-------------	----------	--

301-117	Insurance	<u>X</u>	<p>A certificate of Liability Insurance is included in the application. It is valid through 6/1/2019</p> <p>Change purchase from to permit the (paragraph 2 line 5) and add the Emery County Recorders office to the list of locations.</p>
	Proof of Publication	<u>X</u>	
	Facilities and Structures Used in Common	<u>NA</u>	

301-118	Filing Fee	<u>X</u>	The \$5 filing fee for new permit has been paid.
---------	------------	----------	--

301-123	Notarized Signature of Responsible Official	<u>X</u>	Tony Welch is the responsible Official, the application will need to include a notarized signature.
---------	---	----------	---

301-130	Information Collection: Technical Data Accompanied by Names of Persons or Organizations that Collected and Analyzed the Data - Dates of Collections - and Analysis of the Data and Description of the Methodology Used to Collect and Analyze Data	<u>X</u>	<ul style="list-style-type: none"> •Richard B. White, P.E. - President/Civil Environmental Engineer Earth Fax Engineering Group, LLC (engineering, soils, hydrology, bonding, alluvial valley) •Patrick Collins, Ph.D.- President, Mt. Nebo Scientific, Inc. (vegetation) •Val Payne- Wildlife Biologist, Utah Power and Light Company (wildlife)
---------	--	----------	--

301-200	Soils	<u>X</u>	
211	Description of Pre-mining Soil Resources	<u>X</u>	Appendix 2-2
221	Prime Farmland Investigation	<u>X</u>	None present, Section 223.
222	Soil Survey	<u>X</u>	Section 222.
224	Substitute Topsoil Info (When Proposed)	<u>X</u>	none proposed, Section 224.
230	Operation Plan Topsoil Handling/Removal/Storage	<u>X</u>	Section 230 through 234.300 and Plate 2-1 and Appendix 3-2 . 33,900 CY subsoil and 2,300 CY topsoil stockpiled, Plate 5-1.
240	Reclamation Plan Soil Redistribution/Stabilization	<u>X</u>	Section 240 through 244.300, Section 542.100 through 542.300. Plates 5-2, 5-3 and 5-4.

301-300	Biology	<u>X</u>	Biology is addressed in chapter three.
320	Vegetation Information	<u>X</u>	Vegetative, fish, and wildlife resources in the vicinity of the CVM site are discussed in Section 320. Additional information regarding vegetative resources is provided in Appendices 3-1 and 3-2.
322	Fish and Wildlife Information	<u>X</u>	Vegetative, fish, and wildlife resources in the vicinity of the CVM site are discussed in Section 320. Additional information regarding vegetative resources is provided in Appendices 3-1 and 3-2.

323	Maps/Photos Vegetation-Fish-Wildlife Areas	<u>X</u>	The results of vegetation and wildlife surveys in the permit area are provided on Plates 3-1 and 3-2, respectively. The location of the reference area for determining revegetation success is shown on Plate 3-1.
330	Operation Plan Vegetation-Fish-Wildlife Protection	<u>X</u>	Measures taken for the protection of fish and wildlife are included in this section
341	Reclamation Plan for Revegetation	<u>X</u>	The plan to reclaim vegetative, fish and wildlife resources to a condition suitable for the post-operations land use is presented in Section 340.
342	Fish & Wildlife Plan for Reclamation Phase	<u>X</u>	The plan to reclaim vegetative, fish and wildlife resources to a condition suitable for the post-operations land use is presented in Section 340.

301-400	Land Use and Air Quality	<u>X</u>	Included in the 400 section of this application.
411	Pre-Mining Land Use Information (Includes Cultural Resources)	<u>X</u>	Section 301-411 and APPENDIX 4-2 CULTURAL RESOURCE INVENTORY
412	Post-Mining Land Use Information	<u>X</u>	Included in section 301-412.100 of the application.

301-500	Engineering	<u>X</u>	Narrative describing engineering aspects, including reclamation and operation plan are included in chapter 5.
510 520	General Description of Operation Plan (Maps, Locations, Cross-Sections, Narrative, Descriptions & Calculations)	<u>X</u>	General description included in chapter 5. Plan map with X-sections provided on Plate 5-1. Full Geotechnical evaluation and slope stability analysis provided in Appendix 5-2 and 5-3 respectively.
522	Coal Recovery Description	<u>X</u>	Narrative in Chapter 5 (Page 5-13) states that no coal will be recovered from this site.
523	Mining Methods	<u>X</u>	Narrative in Chapter 5 (Page 5-13) states that neither underground nor surface mining will occur at the CVM site.
524	Blasting and Explosives Plan	<u>NA</u>	
525	Subsidence Control Plan	<u>NA</u>	
526	Mine Facilities Description (Narrative, Plans, Maps) Including Existing Structures & Support Facilities	<u>X</u>	Narrative in Chapter 5 mentions that all support facilities on site are to be mobile only -- no permanent structures utilities or equipment is to be constructed on this site.

527	Transportation Facilities (Including Plans & Maps)	<u>X</u>	No belts nor rail systems are to be constructed on site. Only a primary road into the mine plus minor ancillary roads are to exist on site. Primary road X-sections included on Plates 5-3 and 5-4.
528	Coal Mine Waste Plans (Description & Designs)	<u>X</u>	Narrative in Chapter 5 (Pages 5-16, 5-17) describe how potentially acid forming waste will be treated on site.
529	Management of Mine Openings (Design)	<u>NA</u>	
531	General Plans for Structures	<u>X</u>	Chapter 5 narrative (Page 5-18) clarifies that only a sediment pond will be located on site. No other structures will exist in the permit area.
532	Sediment Control	<u>NA</u>	
533	Impoundments	<u>X</u>	Chapter 5 narrative (Pages 5-19 - 5-21) discusses slope stability considerations for the waste pile and sed pond, and Appendix 5-3 includes a stability analysis.

301-534	Roads (Plans, Drawings, Designs, & Specifications)	<u>X</u>	Narrative in Chapter 5 describes construction and maintenance of the primary road, and cross sections are included in Plates 5-1 and 5-3. Road certification is found in Appendix 5-1.
535	Spoil	<u>X</u>	Chapter 5 narrative (Page 5-22) states that no spoil will be generated within the permit area.
536	Coal Mine Waste	<u>X</u>	Chapter 5 narrative (Page 5-23 - 5-26) describes how coal mine waste will be placed and surface water managed on site. Full Geotechnical evaluation and slope stability analysis provided in Appendix 5-2 and 5-3 respectively.
537	Regraded Slopes	<u>X</u>	Chapter 5 narrative (Page 5-26) states that no no significant slope regrading will be performed on site.
540 541-542	Reclamation Narrative, Maps and Plans	<u>X</u>	A reclamation narrative is included in Chapter 5 (Page 5-26 - 5-33), including a timetable on Table 5-1. Reclamation X-sections for roads and waste piles included on Appendices 5-2, 5-3, & 5-4.
551	Casing and Sealing Underground Openings	NA	
553	Backfilling and Grading Description	<u>X</u>	Backfilling and Grading is addressed in Chapter 5 (Pages 5-33, 5-34).

301-600	Geology	<u>X</u>	A description of the Geology of the site is located in section 600 of the application..
621	Description of Geology (Permit & Adjacent Area)	<u>X</u>	Geology resource information is found in section 621-627. This site is an existing permitted waste rock site that is now being permitted by another operator. The entire site, with the exception of a small area covered by a thin veneer of tertiary gravel, is composed of Masuk member of Mancos shale of the Cretaceous period. Appendix 6-1 contains an evaluation of the acid and toxic forming characteristics of the waste rock deposited at the site.
622	Geologic Cross-Sections, Maps, and Plans	<u>X</u>	Plate 6-1 is a map of the geology of the area. No coal mining or exploration is planned for the area so there is very little stratigraphical information provided.
630	Plans for Casing and Sealing Holes	<u>X</u>	No exploration holes are planned to be drilled as the site will only be used for the disposal of waste rock from the near by mines.

301-700	Hydrology	<u>X</u>	The hydrology section is well organized and written in a format following the R645-301-700 rules.
721	Description of Hydrologic Resources (Permit and Adjacent Area)	<u>X</u>	The application provides a discription of Surface and Groundwater resources within the permit area.
722	Cross-Sections and Maps Subsurface Water - Surface Water - Monitoring Stations - Wells	<u>X</u>	The water resources within the permit area are shown on Plate 7-4.
723	Sampling and Analysis	<u>X</u>	The application discusses water monitoring locations within the permit area.
724	Baseline Information Ground Water - Surface Water - Geology - Climatological & Supplemental; If Needed	<u>X</u>	Water monitoring information has been collected at the site by the sites previous owner for decades.
728	PHC Determination	<u>X</u>	The application provides a narratvie on Probable Hydrologic Consequences in section R645-301-728.
730	General Operation Plan Minimize Disturbance to Hydrologic Balance & Compliance with Clean Water Act	<u>X</u>	The operation plan includes narratives and supporting maps and designs to protect surface and groundwater resources within and adjacent to the permit area.
731	Ground and Surface Water Protection	<u>X</u>	The application provides narratives and calculations in appendicies discussing BTCA and ASCA implementation at the site.

732	Sediment Control Measures	<u>X</u>	The application provides narratives and calculations on BTCA measures that will be implemented at the site.
-----	---------------------------	----------	---

301-740	Plans and Designs Operation and Reclamation Plan Sediment Control Measures	<u>X</u>	In addition to the Hydrology narrative, the application includes nine appendicies showing designs and calculations for sediment control measures at the site.
	Siltation Structures	<u>X</u>	Appendix 7-8 discusses ASCA's at the site.
	Sediment Ponds	<u>X</u>	The application provides a narrative and
	Other Treatment Facilities	<u>NA</u>	
	Diversions	<u>X</u>	Diversion narrative and calculations are provided in Appendix 7-7.
	Road Drainage	<u>X</u>	Appendix 7-7 discusses road drainage and sediment control measures to treat the drainage prior to leaving the site.
	Impoundments	<u>X</u>	Appendix 7-7 includes informaion on impounding runoff at the site.
	Discharge Structures	<u>X</u>	Appendix 7-7 includes operation hydrology designs on discharge structures.
	Disposal of Excess Spoil	<u>X</u>	The main narrative includes a discussion on disposal of Excess Spoil.
	Coal Mine Waste	<u>X</u>	Coal mine waste will be contained onsite by impletement BTCA's.
	Disposal of Non-Coal Mine Waste	<u>X</u>	The main narrative includes a discussion on disposal of non-coal mine waste.
	Casing and Sealing of Wells	<u>X</u>	Reclamation narrative and designs are provided in Appendix 7-9.

301-800	Bonding and Insurance	<u>X</u>	Narrative describing which areas are included in the bonding calculations, and where the calculations are derived from.
820	Applicant Have Adequate Bond at Permit Issuance	<u>X</u>	Calculated bond amount appears to be adequate.
830	Bond Estimate and Calculations Provided	<u>X</u>	Detailed calculations provided in Appendix 8-1.

890	Certificate of Insurance Provided	<u>X</u>	Certificate of insurance provided in Appendix 1-2. -- Although the certificate does not identify DOGM as the Certificate Holder, nor does it indicate the Division will be notified in the event of cancellation.
-----	-----------------------------------	----------	---

302-200	Special Categories of Mining	<u>NA</u>	
210	Experimental Practices Mining	<u>NA</u>	
220	Mountaintop Removal Mining	<u>NA</u>	
230	Steep Slope Mining	<u>NA</u>	
240	Auger Mining	<u>NA</u>	
250	In Situ Processing Activities	<u>NA</u>	

302-260	Coal Processing Plants (Not Located Within Permit Area of Mine)	<u>NA</u>	
270	Variances From Approximate Original Contour Restoration Requirements	<u>NA</u>	
280	Variances for Delay in Contemporaneous Reclamation Requirement in Combined Surface and Underground Coal Mining Activities	<u>NA</u>	
290	Small Operator Assistance Program (SOAP)	<u>NA</u>	

302-300	Special Areas of Mining	<u>NA</u>	
301	Prime Farmland	<u>NA</u>	
302	Alluvial Valley Floors	<u>NA</u>	