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C/025/0005
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Task ID #4772

December 26, 2014

Daron R. Haddock
Coal Program Manager
Oil, Gas & Mining
1594 West North Temple, Suite 1210
Salt Lake City, UT 84114-5801

Subject: **Response to Rejection for Underground Coal Mine Amendment, Task Id. 4730, Alton Coal Development, LLC, Coal Hollow Mine, Kane County, Utah, C/025/0005**

Dear Mr. Haddock,

Alton Coal Development, LLC has made the requested changes to the Underground Amendment identified in Task Id.4730. Competing scenarios have been removed from the MRP. Where Dwgs having alternate scenarios where labeled with an "A", the only remaining scenario does not have an alpha character. Dwgs 5-22A through 5-22H will remain as they are required by regulation showing the design of all the primary haul roads on the mine site. Drawing 5-3 show the updated spoils pile and new culverts requested to be added during and inspection. The Division indicated in the December 3rd meeting that the underground amendment could be resubmitted for review while discussion continued concerning bonding, thus deficiencies in Task Id. 4652 have not been addressed at this time.

Section 116 has been update as well as drawing 5-3 to show one disturbed area, however, the legal descriptions in Chapter 1 of the MRP are of the property leases not the disturbed areas. Revisions to the legal descriptions of disturbed areas will be revised on Exhibit A of the reclamation agreement. Finally, text and a revision has been added to address the contingency plan to use Sediment Pond 3 with this submittal.

Changes to the MRP associated with this amendment have been uploaded to the DOGM's server for review. PDF versions of drawing are not certified. Upon approval, 2 (two) clean hard copies of text and certified drawings for insertion into the MRP will be submitted. Please do not hesitate to contact me if you have any questions 435-691-1551.

Sincerely

B. Kirk Nicholes

B. Kirk Nicholes
Environmental Specialist

Alton Coal Development, LLC
463 North 100 West, Suite 1
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Phone (435) 867-5331 • Fax (435) 867-1192

November 26, 2014

Daron R. Haddock
Coal Program Manager
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1594 West North Temple, Suite 1210
Salt Lake City, UT 84114-5801

Subject: **Response to deficiencies for Underground Coal Mine Amendment, Task Id. 4652, Alton Coal Development, LLC, Coal Hollow Mine, Kane County, Utah, C/025/0005**

Dear Mr. Haddock,

Alton Coal Development, LLC is providing this submittal in response to the deficiencies received in Task Id.4652 for the addition of underground mining to the Coal Hollow MRP. The following pages respond to how each deficiency was addressed with the exception of those deficiencies that relate to bonding issues. A meeting has been scheduled with you and key members of your staff with the intentions clarifying the best method to determine the bond for the Coal Hollow Mine.

Changes to the MRP associated with this amendment have been uploaded to the DOGM's server for review. Upon approval, 2 (two) clean copies of text and drawings for insertion into the MRP will be submitted. Please do not hesitate to contact me if you have any questions 435-691-1551.

Sincerely

B. Kirk Nichole

B. Kirk Nicholes
Environmental Specialist

R645-301-116, Disturbed acreage is listed by mining phase in Section 116 of the MRP. Section 116 should be updated with this application along with drawings 5-16A, 5-18, 5-19, 5-38 and 5-38A.

The table in Section 116 for disturbance acreages has been updated. Drawing 5-16A, and 5-38A have been removed and 5-16

R645-301-112.800, The permit term is not extended by this application beyond 6 years (2017) at which time Pit 11 underground access will be reclaimed. If the Permittee has an interest in extending the underground operations eastward into adjacent lands and thereby delaying reclamation of pit 11, then a statement of the interest in contiguous lands should be declared in accordance with R645-301-112.800. If there is no interest in contiguous lands, then application should provide a narrative and timeline for reclamation of the portals and the pit in which they are located.

Additional details have been added to Section 116 with respect to interest in contiguous lands.

R645-301-121 The proposed clean-copy version of page 7-97 does not contain the information changed in the red-line version of the application.

Upon approval of the clean copy of this page will have the correct information.

R645-301-121 The following sets of pages within the approved MRP have information cut off between pages: 7-4 to 7-5, 7-12 to 7-13, 7-23 to 7-24, and 7-25 to 7-26. Please correct these problems.

A clean copy of pages 7-1 through 7-24 have been included with this submittal separate from pages in the Chapter 7 review to be added to correct missing information.

Clarify referenced rule: Rule R645-301-624.400 does not exist.

Corrected incorrect reference – it now reads 645-301-624.340 (ECP)

R645-301-121.200, The pagination of the Table of Contents is not accurate and must be revised.

Chapter 1 TOC was identified as having pagination. Chapter 1 TOC has been corrected and resubmitted.

R645-301-622.200, -624.110, -642.210; R645-301-722, -725.100: Need a geologic cross-section between drill holes CH-1-05 and CH-2-05 (extrapolation may be necessary below abandonment depth of well CH-2-05), north of cross-section E-E' in drawing 7-15. Cross-section should include:
1) the sink valley fault
2) geologic stratum
3) aquifer contained within alluvium and pre-mining potentiometric surface
4) delineation between 'Fine Grained Alluvium' and 'Potential Coarse Grained Alluvium' if present

Prepared a geologic/hydrogeologic cross-section that includes the requested information. It is presented as Figure 3 in the Petersen Hydrologic PHC for the underground mining. The location for the cross-section A-A' is provide in Figure 2 of the same report (ECP)

R645-301-728.350 Update section 728, Probable Hydrologic Consequences, of the MRP to include an evaluation of potential impacts to the hydrologic balance with the addition of underground mining.

A probable hydrologic consequences determination for the proposed underground mining has been prepared. It is included as Appendix 7-15 (ECP)

R645-301-728.334 In multiple sections of the PHC, groundwater impacts are evaluated based on the intention of leaving pits open less than 60 to 120 days. The pits where the underground mining portals will be located will be left open for a longer period of time, so these sections of the PHC should be updated to assess impacts of leaving these pits open.

A discussion of the probable hydrologic consequences of leaving pit 10 open for the portals access during the life of the underground mine is provided in the Petersen Hydrologic report in Appendix 7-15 (ECP)

R645-301-728.400 If pits 13, 14, and 15 will no longer be surfaced mined due to proposed underground mining, commitments in the current PHC regarding the construction of a low-permeability barrier should be evaluated to determine if this information is still needed in the plan. Section 731.530 of the approved MRP should also be updated to indicated that the water-replacement well has already been drilled.

The appropriate sections of Chapter 7 have been updated to reflect that the engineered barrier is no longer included in the mining and reclamation plan for the Coal Hollow Mine (ECP)

R645-301-722 Please update maps 7-4 and 7-5 of the approved MRP, to contain the most current permit boundary.

Drawings 7-4 and 7-5 have been updated to include the most current permit boundary.

R645-301-722 Please update maps 5-25 and 5-26 of the approved MRP, to contain the most current permit boundary.

Drawings 5-25 and 5-26 have been updated to include the most current permit boundary.

R645-301-525.212, Blasting within 500 feet of an active or abandoned underground mine. The added description of the mining method to be implemented to recover underground reserves meets the requirements of this section. However, the red line revised text of this section states that ""No surface mining or reclamation activities are proposed to take place within 500 feet of the underground mine."" This statement should be re-evaluated by the Permit applicant as its stated meaning is that no backfilling, grading, topsoiling or re-vegetation work can occur within 500 feet of the underground Coal Hollow Mine. R645-3Q1-525.212 references that if a Permittee needs to blast within 500 feet of an active or abandoned underground mine, that an anticipated blast design be submitted to the Division. No blast design was submitted as part of the Task ID # 4652 application. The revised text (no surface mining or reclamation activities are proposed to take place) dictates that no reclamation activities will occur within 500 feet of the deep mine face-up. The Division expects that all reclamation of the surface mined pits (with the exception of Pit 11) be completed within one year of the initiation of underground mining.

No surface mining or reclamation or mining activities are planned to take place within 500 ft of the underground mine at this time. A supplemental drawing has been attached at the end of the response to the deficiencies to illustrate the area of the permit that is encompassed within a 500ft radius of the portals. Pit 10 comprises most of that radius and a portion of topsoil stockpile 4 to the north of Pit 10 is also included. Material from this stockpile will be utilized once the underground is completed and backfilled. Therefore, there will be no surface mining or revegetation work within 500 feet of an active mine until reclamation of the underground mine portals and the pit that it is established in.

In accordance with the requirements of R645-3Q1-524.212, Drawing 5-38 should be re-certified for the Task ID#4652 application.

Drawing 5-38 has been recertified.

In accordance with R645-301-515.321 the statement in this section needs to be updated to include any potential underground opening closures and water treatment activities that will continue during the temporary cessation.

Section R645-301-515.321 was added to address temporary cessation of the underground.

R645-301-521.141 the text was edited to include the updated Drawings, however, the text only references surface mining while the Drawings include surface and underground mining. Following said paragraph in section 521.141 a new paragraph was added describing the underground operations but only references Drawings 5-38 and 5-10A when Drawings 5-3, 5-9A, 5-10A and 5-38 (as currently labeled) also show relevant information. As per R645-301-521.141, this section of text should be edited to include all the properly labeled Drawings that are relevant to understanding both surface and underground operations.

Both the text and the Drawing labels have been changed to agree with the addition of the underground.

The text in the section 526 mine facilities R645-301-121,-121.100 for this section in the redline is the original MRP and is not current version of the MRP for this section.

Cheryl Parker indicated that she was referring to an incorrect version of the MRP. No additional changes are needed.

R645-301-521.142 states that subsidence will be prevented by following the recommendations provided in the reference Norwest Corporation letter report, Appendix 5-9. The attached report included recommendations of a seven or five entry designs but does not reference or detail the calculations for pillar stability of the three entry design shown on Drawing 5-10A. See subsidence control plan section for further discussion. The calculations for pillar safety and percent extraction for the proposed five underground sections is not included and should be to verify no subsidence around the portals where overburden is relatively thin.

See Section 525 and Appendix 5-9 for additional information on pillar sizing and subsidence protection for low cover areas.

R645-301-521.162 text needs to be updated to include a yearly and overall disturbance sequence for the permitted area on Drawing 5-2 for open pit mining, alternative method of highwall mining, and underground mining.

Drawing 5-2 is open pit or surface mining only, which is not being changed with this amendment. However, Drawing 5-2A has had text updates to make it consistent with the open pit, highwall and underground mining alternative.

R645-301-521.163 needs to be updated to include specific reclamation techniques required for reclamation of underground operations as well as the area of land shown on the updated Drawing 5-3.

Reclamation of underground operations is discussed in updated Section 541.100-400 of this submittal.

R645-301-521.170 the transportation facilities text and drawings need to be updated to include the new conveyor system and the portal access/haul road associated with underground operations.

Updated text and drawings of transportation facilities are included in this Section and on Drawings 5-3 and 5-3A.

R645-301-121 .100, As discussed during a recent site visit, the portals may be developed in Pit 10 rather than Pit 11 as shown on Drawing 5-10A and if so, the benches developed in pit 10 are at 40 ft. intervals rather than the 50 ft. intervals shown on Dwg 5-3B. A commitment to provide as-built maps for Drawing 5-10A and 5-3B is requested in the MRP.

Asbuilt Drawings 5-10A and 5-3B will be added to the MRP once Underground Facilities are completed.

The applicant will need to update the current plan to include emissions from generators and any other emission type equipment that may be needed to facilitate underground mining activities and provide the appropriate approvals from the Division of Air Quality.

Text detailing actions complete in revising the Approval Order with UDAQ have been added to Chapter 4 Section 422.

R645-301-121,-121.100 The redline section of Chapter 5, page 5-22 through 5-26 does not use the latest incorporated version of the MRP that the Division has on file. The current version of the MRP has incorporated task items #4517 (3/21/2014) and #4605 (6/25/2014) which supersedes all prior versions.

Cheryl Parker indicated that she was referring to an incorrect version of the MRP. No additional changes are needed.

R645-301-522 requires a discussion of the underground operation designs that will utilize an extraction of 50% or less, and a pillar width/height ratio in excess of 4.0 to negate any subsidence as a best technology currently available to maintain the environmental integrity of the site so that re-affecting the land in the future through coal mining and reclamation operations in minimized. In the event the portals will remain open and future underground operations are to occur outside the current permit boundary a discussion of such intents should also be included. The reference Norwest Report (appendix 5-9) reference designs for the Federal Right of Way and not sections within the permitted area.

Additional text has been added to this Section and to Section 525 (Subsidence Control Plan) to protect the portals if needed for future underground operations.

R645-301-523 The opening text of this section needs to be updated to reflect the underground mining methods as well as the open pit methods, including underground mining equipment.

The opening text of the Section has been updated to reflect underground and surface mining methods, including planned underground mining equipment.

R645-301-523 The following paragraph needs to be updated to reflect the updated alternative option tons produced from 3.0 million tons of coal to 3.5 million tons of coal with an update life approximation.

Updates have been have been made.

R645-301-523.100,-523.200.-523.220 Additional detail must be added to describe the sequence of mining and reclamation activities associated with Pit 9 Panel 3, Pit 10, and Pit 11 reclamation. If the portals are install within Pit 10 instead of Pit 11, as shown on Figure 5-10A, Pit 9 will likely fall within the 500 feet radius and will need to be addressed as to what its current state will be at the point of start of underground mining.

Additional text has been added to Chapter 5. Also a supplemental drawing has been attached at the end of the response to the deficiencies to illustrate the area of the permit that is encompassed within a 500ft radius of the portals. Pit 10 comprises most of that radius and a portion of topsoil stockpile 4 to the north of Pit 10 is also included. Material from this stockpile will be utilized once the underground is completed and backfilled. Therefore, there will be no surface mining or revegetation work within 500 feet of an active mine until reclamation of the underground mine portals and the pit that it is established in.

R645-301-525.311, Utilization of Subsidence Technology / R645-301-525.490, Other Information
The Task ID# 4652 application utilizes the information contained in Appendix 5-9 as technical support for the five entry and seven entry development systems which are intended to prevent subsidence and material damage to the extent economically and technologically feasible, maintain mine stability, and maintain the value and reasonably foreseeable use of the surface lands (See R645-301-525.311).

Appendix 5-9 is to be added to the mining and reclamation plan. It discusses entry width, cutting height, # of entries, extraction ratios, etc. and its contents meet the requirements of R645-301-525.240.

The submitted geotechnical report does not meet the requirements of the R645 Coal Mining Rules for the following reasons:

1) Appendix 5-9 was not P.E. certified by Mr. John C. Lewis. The Division can require that a subsidence control plan be certified under R645-301-525.490, Other Information. A sufficient amount of technical support was used in determining the pillar sizes for the different overburden depths and multiple entry configurations and the Division believes this technology is adequate to support the requested P.E. certification.

2) Although the pillar designs and their respective extraction ratios indicate that no subsidence will occur over the developed workings, the Division requires that in accordance with;

a. R645-301-525.440, A description of the monitoring, if any, needed to determine the commencement and degree of subsidence so that when appropriate other measures can be taken to prevent, reduce, or correct material damage.

b. The Division requires that the Permittee conduct surface walkovers of the developed panel areas within 60 days of completion of the mining of the land above the panel recovery areas, and at least once during the year following the completion of mining in the these areas.

c. If the walkovers determined that no affects or voids have developed to the surface, the Permittee will document this and forward same to the Division.

d. If surface cracking, or sinkhole type subsidence or other surface impacts are noted during surface walkovers, they will be documented, and located on a surface topographic map, reported to the Division, photographed, and repaired. The repair plan shall be approved by the Division prior to initiation of the field work (See R645-301-525.480).

If the surface monitoring indicates that no deformation is occurring, the Permittee can apply to the Division to discontinue the approved monitoring plan, based upon adequate documentation of the monitoring survey.

The Norwest Report in Appendix 5-9 has been certified by Mr. John C. Lewis. Section 525 has been expanded to discuss the surface observations (walkovers) and reporting requirements as requested by the Division.

R645-301-121,-121.100 The text included for this section in tile redline is the original MRP and is not current version of the MRP for this section.

Cheryl Parker indicated that she was referring to an incorrect version of the MRP. No additional changes are needed.

R645-301-525.300,-525.310,-525.311 The application details how subsidence control measures in regards to underground mining operations are not required due to supporting details in Norwest's geotechnical report. The supports as designed are intended to prevent subsidence for any reasonable foreseeable use of surface lands. However Norwest's report is insufficient to meet R645-301-525.240 due to:

Appendix 5-9 calculations reference underground operations outside of the existing permitted area. The Division requests that the PE Mr. John C Lewis stamp the subsidence control plan due to high level of certainty required in the calculations to guarantee no subsidence for the underground designs within the permitted area.

Appendix 5-9 has been certified by Mr. John C. Lewis.

R645-301 525.440 requires that appropriate monitoring and mitigation plan be included in the application so that in the event of any unexpected subsidence, proper procedures can be implemented. Such monitoring events could include surface inspections after panels have been completely mined out with documentation and notification to the Division in the event of any changes or repairs.

An updated subsidence control plan, including observations, reporting and mitigation is provided in Section 525.

R645-301-533.700-714 The current MRP needs to be updated to reflect the changes in reclamation timing due to underground mining as it currently reflects the timing shown in Drawing 5-38.

Drawing 5-38A represents the reclamation scenario for underground mining, Drawing 5-38 has been updated to reflect reclamation timing due to underground mining.

R645-301-121,-121.100 The text included for this section in the redline is the original MRP and is not current version of the MRP for this section.

Cheryl Parker indicated that she was referring to an incorrect version of the MRP. No additional changes are needed.

R645-3-1-332; Development or first mining typically does not produce any noticeable subsidence. However second or retreat mining in a room and pillar operation will subside the surface. The text on Page 3-43 of the application should include a reference to the appropriate section of the MRP where the predicted subsidence information can be located. The text also needs to be revised to include a description of the anticipated impacts of subsidence on renewable resource lands and how such impacts will be mitigated.

The text on Page 3-43 states that subsidence control information is provided in Section 525.

R645-301-121,-121.100 The text included for this section in the redline is the original MRP and is not current version of the MRP for this section.

Cheryl Parker indicated that she was referring to an incorrect version of the MRP. No additional changes are needed.

R645-301-534.100-200,-534.300-340 The current MRP needs to be updated to reflect the changes in reclamation timing due to underground mining as it currently reflects the timing shown in Drawing 5-38. The needs to be an added discussion of the portal access road proposed in the amendment as well as figure updated.

The reclamation methods and timing with underground mining is discussed in Section 541.100-400 and shown on updated Drawing 5-38A.

R645-301-527.100 Clarification is need as to what haul road is being used as portal access and to remove coal from the underground stockpile outside the portals.

Clarification of haul roads and portal access road is provided in this Section.

R645-301-527.200 Specification for each road along with maintenance plans need to be provided

This section has been updated to provide specifications for all roads.

R645-301-527.200 the following needs to be address according to the state regulation:

1) Clarification is need if the seven primary roads listed in the original MRP include the portal access/haul road to the underground facilities
2) A description of the portal access road is required.
3) A description of the shuttle cars, underground conveyor system and convey or stacking systems is required.

This section has been updated to state there will be eight primary roads, including the portal access road. The stacking conveyor information is also included in this section.

R645-301-121,-121.100 The text included for this section in the redline is the original MRP and is not current version of the MRP for this section.

Cheryl Parker indicated that she was referring to an incorrect version of the MRP. No additional changes are needed.

R645-301-528.200 This section needs to be updated to reflect the scenario that Pit 10 or Pit 11 will remain open with continued underground mining operations and how overburden will be placed in the surrounding pits within 500 ft of the proposed portals before underground operations begin.

Text has been added to R645-301-528.200 to reflect underground mining from Pit 10.

R645-301-731.211. Deficient in monitoring groundwater quantity up-gradient of the proposed underground mining areas 1st N, 2nd N, 3rd N, and 4th N. Groundwater wells north of the proposed underground mining are either not screened deep enough (Y-99) to measure the 'Potential Coarse Grained Alluvium Zone' water-levels shown in cross-section E-E' (Drawing 7-158) or the well (UR-70) is not within the ground-water basin directly up-gradient of the underground mining area. The Permittee needs to install a well within the coarse grained alluvium of the Sink Valley ground-water basin, near the north-south permit boundary, and directly up-gradient of the 4th N underground mining zone (shown in Drawing 5-10A).

Hydrologic baseline information from wells screened in the coarse-grained alluvial system up-gradient of the proposed underground mining areas has been provided in the Petersen Hydrologic PHC report (Appendix 7-15) (ECP)

R645-301-731 The Permittee should include a plan to handle and monitor any intercepted groundwater, taking into account volume, quality, duration of flow, as well as clearly setting monitoring and reporting requirements.

A description of the plans to handle and monitor intercepted groundwater in the underground workings is provided in the Petersen Hydrologic PHC document, Appendix 7-15 (ECP)

R645-301-733 Please update page 7-55 paragraph one, and 7-54 paragraph two, to include the correction that there are five sediment impoundments instead of four.

Pages 7-54 and 7-55 were updated to reflect five sediment impoundments.

R645-301-121.200,-141, -512.100, -512.110 Drawings submitted with permit applications will be presented in a consolidated format, to the extent possible, and will include all the types of information that are set forth on U.S. Geological Survey of the 1:24,000 scale series.

All resubmitted drawings have both a scale and scale bar.

The Drawings in the application need to be updated in accordance with R645-301-141 USGS 1:24,000 Drawings include a scale and a scale bar. The Drawing formats, as submitted, leave a chance for misinterpretations due to resizing during printing. A scale bar helps maintain accuracy regardless of the printed format.

All resubmitted drawings have both a scale and scale bar.

In accordance with R645-3D1-121.200, for clarification, on Drawing 5-3 the area currently show just as the portals should be relabeled ""Portals and Underground Facilities/ Structures Area"" because this area calls out the portals and numerous other facilities/structures associated with the underground operations such as a the portal access ramp, underground product conveyor belt, radial stacker belt, ventilation fan, a generator pad, sump pond, and coal stockpile.

Drawing 5-3 has been relabeled.

Format errors on Drawing 5-3B are erroneous or misleading include:

1) Updated with a current PE stamp
2) The date on the title blocks is 2008
3) Drawn by employee no longer involved in operations
4) Scale ratio is ambiguous and liable to misreading without a bar or reference sheet size*
5) Updated with labels on the elevation of the contours on the plan view
6) Details of the shotcrete around the portals
7) Details of the generator pad and fan

All noted format errors have been corrected on updated Drawing 5-3B.

Drawing 5-9A and Drawing 5-10A are presumably mislabeled. Both updated Drawings show the surface and underground operations, though in the in Table of Contents Drawings 5-9A and 5-10A are labeled ""Surface & Highwall Mining."" Either the number is wrong or the title needs to be updated to reflect the underground operations as well.

Both the drawings and the TOC have been updated to reflect the underground operations.

Within the application the details on the shotcrete around the portals and the generator pad are missing. The following Drawings likely need to be added or updated to reflect the new underground operations:
5-2 Disturbance Sequence
5-8B Facilities and Structural Electrical
5-8C Facilities and Structural Water plan
5-16A Overburden Removal Sequence
5-18 Overburden removal Sequence
5-19 Overburden Removal Stages
5-22 Primary Mine Haul Roads Plan View
5-36 Post mining Topography-Cross section F-F' needs to be updated
5-38 Reclamation Sequences
5-38A Reclamation Sequences

Drawings 5-8B, 5-8C and 5-38 represent only surface operations, additional details for electrical and water have been added to drawing 5-3B for the Underground Mine. 5-18 and 5-19 are related to bond and will be update after the Dec. 5th meeting. No changes are needed for 5-36 at this time. All other drawings have been updated.

R645-301-512.100 and -512.110 /R645-301-525.490 and -525.300
Drawing 5-3B should be updated with a current P.E. stamp in accordance with R645-301-512.100 and -512.110.

Drawing 5-3B has been updated and certified.

Appendix 5-9 must be P.E. certified to support the subsidence control plan for the Alton underground mine.

Appendix 5-9 has been PE certified by Mr. John C. Lewis.

R645-301-513.500 was not updated to include the sealing of the portals at the conclusion of underground mining activities and final reclamation. It is mentioned in section 529 but also needs to be updated here as well.

Closure and reclamation of underground portals has been included in this section.

R645-301-513.700 requires the permittee to show the nature, timing, and sequence of the surface coal mining and reclamation activities that propose to mine closer than 500 ft to an active underground mine for approval by the division and MSHA. Clarification in text and on Drawing 5-38 is required for the sequence of reclamation of Pit 10, Pit 11, and Pit 9 Panel 3.

Drawing 5-38 represents the reclamation sequence of surface coal mining only, no changes were made.

R645-301-121,-121.100 The text included for this section in the redline is the original MRP and is not current version of the MRP for this section.

Cheryl Parker indicated that she was referring to an incorrect version of the MRP. No additional changes are needed.

R645-301-541.300,-513.500,-529, -542.700 A discussion needs to be added discussing how underground facilities will be removed.

Removal of underground mining facilities is discussed under Sections 526.200 and 541.100-400.

R645-301-542.100 Needs to be updated to reflect the time table reclamation of portal sealing and reclamation of remaining open pits within 500 ft of the portals.

No surface mining or reclamation or mining activities are planned to take place within 500 ft of the underground mine at this time. A supplemental drawing has been attached at the end of the response to the deficiencies to illustrate the area of the permit that is encompassed within a 500ft radius of the portals. Pit 10 comprises most of that radius and a portion of topsoil stockpile 4 to the north of Pit 10 is also included. Material from this stockpile will be utilized once the underground is completed and backfilled. Therefore, there will be no surface mining or revegetation work within 500 feet of an active mine until reclamation of the underground mine portals and the pit that it is established in.

R645-301-542.300 Missing drawing reclamation cross sections

Proposed final reclamation cross sections can be viewed on Drawings 5-36 for the preferred reclamation scenario and on Drawing 5-35A for the alternate reclamation scenario

R645-301-542.800 Reclamation costs need to be updated in Appendix 8-1 to reflect underground facilities reclamation.

A meeting has been arraigned to discuss options for revisions to the bond on Dec. 3, 2014 after which Appendix 8-1 will be updated.

R645-301-121,-121.100 The text included for this section in the redline is the original MRP and is not current version of the MRP for this section.

Cheryl Parker indicated that she was referring to an incorrect version of the MRP. No additional changes are needed.

R645-301-553 text needs to be updated to include the timeline of sealing portals in junction with no surface activities within 500 ft of the portals until underground operations have ceased.

R645-301-513, -301-529,-301-551
The following pages, and sections refer to the management of the underground mine openings associated with the Alton Coal underground operation;
1) Page 5-51, Section 529, Management of Mine openings
2) Page 5-50, section 528.340, Return of Pit 11 Spoil Material from the excess spoils pile to the Pit 11 area after underground operations have ended
3) Page 5-63, section 535.500, Disposal of Excess Spoil At Drift Entries; all spoil removed from the Pit 11 area to mine the pit coal and develop the underground entries will be recovered from the excess spoil pile. This will be used in the closing off of the underground face up entries and Pit 11.
4) Page 5-64, Section 540, RECLAMATION PLAN, section 541.100-400 General ;""Underground mine portals will be closed in accordance with approved MSHA plans and backfilled"".
5) Page 5-68, Section 542.700, Final Abandonment of Mine Openings and Disposal Areas ""Underground mine portals will be closed in accordance with approved MSHA plans and backfilled"".
6) Page 5-70, Section 551; SEALING AND CASING OF UNDERGROUND OPENINGS
""When no longer required, underground mine openings will be closed in accordance with MSHA approved requirements and backfilled"".
All six pages of the revisions made relative to the permanent closing and sealing of the underground portals say that the underground portals will be sealed according to the MSHA approved plans, which require sealing by backfilling of the Pit 11 area.
The Division does not know if MSHA or the USDOI/ BLM would require concrete block seals 25 feet

inby the highwall of each of the drift entries.
No mention is made of the R645 Coal Mining Rules which require the permanent closure of underground mine openings. Reference R645-301-513, -301-529,-301-551 in the application for clarification that the Division is responsible for the enforcement of same.

A statement has been added to Sections 513.500, 529, 540, 542.70 and 551 which states that underground mine openings will be closed in accordance with R645-301-513, R645-301-529, R645-301-551 and MSHA approved requirements and backfilled.

R645-301-121,-121.100 The text included for this section in the redline is the original MRP and is not current version of the MRP for this section.

Cheryl Parker indicated that she was referring to an incorrect version of the MRP. No additional changes are needed.

The Division does not know if MSHA will require specific closure designs for each of the drift entries. No mention is made of the R645 Coal mining rules which require the permanent closure of underground access points.

A statement has been added to Sections 513.500, 529, 540, 542.70 and 551 which states that underground mine openings will be closed in accordance with R645-301-513, R645-301-529, R645-301-551 and MSHA approved requirements and backfilled.

Findings:
Based on the current information provided by the MRP, it is not clear as to whether the Permittee has a sufficient amount of bond posted to reclaim all of the disturbed acreage at the Mine. It appears that the posted $ 10,000,000 may be insufficient to allow the initiation of mining activities in Phase Ill. Pit sequencing and methods of recovery have been varied numerous times by the Permittee, and in this proposal, Task ID #4652, the Permittee is suggesting that an approval for an underground mine be granted. In this operation, coal recovery and reclamation work must be jointly co-ordinated to ensure that reclamation is not allowed to fall behind by more than 60 days following completion of coal recovery from each pit (See Chapter 5, page 5-59). However, that plan was approved in January of 2010 for a coal stripping operation only. We now have two methods of mining in operation, with a third being proposed.
The currently approved reclamation plan is outdated, and it does not provide adequate information as to the progression of reclamation work following coal recovery by stripping or highwall mining. In accordance with the requirements of;
1) R645-301-121.200, ""the permit application will be clear and concise, "" and
2) R645-301-812-700, ""The Division will require in the permit that adequate bond coverage be in effect at all times"" and
3) R645-301-820.130, ""The Operator will identify the initial and successive areas or increments for bonding on the permit application map submitted for approval as provided in the application , and will specify the bond amount to be provided for each area or increment"".
The $ 10,000,000 bond which is currently in place may not be adequate to ensure the reclamation of the mining areas designated as being part of Phase Ill at Coal Hollow. In order to clarify the amount of acres disturbed by surface mining, and highwall mining, the Permittee will provide a current map of the Coal Hollow Mine showing the following;
A) the identification number of each pit which has been backfilled and rough graded, with the status of progress completed (acreage) .
B) the identification number of each pit which has been subsoiled, with the status of progress completed (acreage).
C) the identification number of each pit which has been topsoiled, with the status of the completed topsoiling activity (acreage completed).
D) the ID number of each pit which has been seeded, with the status of the seeding process (acreage completed).
E) the acreage which has been undermined using highwall mining methods, and the locations where this method has been implemented.

F) the acreage of operations for both Phase II and Phase Ill is to be shown on Map 5-3.
The Permittee must provide adequate information to the Division to support a Division finding as to whether or not sufficient bond is in place at this time. If this can not be shown, the Permittee must either post additional bond in an amount to be determined by the Division, or cease coal recovery activities while continuing reclamation work until adequate bond can be posted.
4) R645-301-511, General Requirements. Each permit application will include descriptions of R645-301-511.300, Reclamation, and
5) R645-301-512.100, Cross Sections and Maps. ""Cross sections and maps will be updated as required by the Division"". The maps which must be updated are the following; Drawings 5-3, 5-38, 5-18 and 5-19.

Bonding will be addressed after the Dec. 5th meeting with DOGM

R645-301-121,-121.100 The text included for this section in the redline is the original MRP and is not current version of the MRP for this section.

Cheryl Parker indicated that she was referring to an incorrect version of the MRP. No additional changes are needed.

R645-301-820.112 Section needs to be updated as coal mining and reclamation operations on succeeding increments are initiated and conducted within the permit area, the permittee will file with the Division an additional bond or bonds to cover such increments in accordance with R645-830.400.

Bonding will be addressed after the Dec. 5th meeting with DOGM

R645-301-830.140 Appendix 8-1 needs to be updated to reflect the new underground mining reclamation costs in detail so that the Division can determine the appropriate bond amount.

Bonding will be addressed after the Dec. 5th meeting with DOGM

APPLICATION FOR COAL PERMIT PROCESSING

Permit Change ☒ New Permit ☐ Renewal ☐ Exploration ☐ Bond Release ☐ Transfer ☐

Permittee: **Alton Coal Development, LLC**

Mine: **Coal Hollow Mine** **Permit Number:** **C/025/0005**

Title: **Underground Coal Mine Amendment - Response to Deficiencies Task ID 4730**

Description, Include reason for application and timing required to implement:

Instructions: If you answer yes to any of the first eight questions, this application may require Public Notice publication.

☐ Yes ☒ No 1. Change in the size of the Permit Area? Acres: ________ Disturbed Area: ________ ☐ increase ☐ decrease.
☐ Yes ☒ No 2. Is the application submitted as a result of a Division Order? DO# ________
☐ Yes ☒ No 3. Does the application include operations outside a previously identified Cumulative Hydrologic Impact Area?
☐ Yes ☒ No 4. Does the application include operations in hydrologic basins other than as currently approved?
☐ Yes ☒ No 5. Does the application result from cancellation, reduction or increase of insurance or reclamation bond?
☐ Yes ☒ No 6. Does the application require or include public notice publication?
☐ Yes ☒ No 7. Does the application require or include ownership, control, right-of-entry, or compliance information?
☐ Yes ☒ No 8. Is proposed activity within 100 feet of a public road or cemetery or 300 feet of an occupied dwelling?
☐ Yes ☒ No 9. Is the application submitted as a result of a Violation? NOV # ________
☐ Yes ☒ No 10. Is the application submitted as a result of other laws or regulations or policies?
Explain: ________
☐ Yes ☒ No 11. Does the application affect the surface landowner or change the post mining land use?
☐ Yes ☒ No 12. Does the application require or include underground design or mine sequence and timing? (Modification of R2P2)
☐ Yes ☒ No 13. Does the application require or include collection and reporting of any baseline information?
☐ Yes ☒ No 14. Could the application have any effect on wildlife or vegetation outside the current disturbed area?
☐ Yes ☒ No 15. Does the application require or include soil removal, storage or placement?
☐ Yes ☒ No 16. Does the application require or include vegetation monitoring, removal or revegetation activities?
☐ Yes ☒ No 17. Does the application require or include construction, modification, or removal of surface facilities?
☐ Yes ☒ No 18. Does the application require or include water monitoring, sediment or drainage control measures?
☒ Yes ☐ No 19. Does the application require or include certified designs, maps or calculation?
☐ Yes ☒ No 20. Does the application require or include subsidence control or monitoring?
☒ Yes ☐ No 21. Have reclamation costs for bonding been provided?
☐ Yes ☒ No 22. Does the application involve a perennial stream, a stream buffer zone or discharges to a stream?
☐ Yes ☒ No 23. Does the application affect permits issued by other agencies or permits issued to other entities?
☐ Yes ☒ No 24. Does the application include confidential information and is it clearly marked and separated in the plan?

Please attach three (3) review copies of the application. If the mine is on or adjacent to Forest Service land please submit four (4) copies, thank you. (These numbers include a copy for the Price Field Office)

I hereby certify that I am a responsible official of the applicant and that the information contained in this application is true and correct to the best of my information and belief in all respects with the laws of Utah in reference to commitments, undertakings, and obligations, herein.

B. Kirk Nicholes	Environmental Specialist	05/30/2014	B. Kirk Nicholes
Print Name	Position	Date	Signature (Right-click above choose certify then have notary sign below)

Subscribed and sworn to before me this 22 day of December, 2014

Notary Public: Marty L Nicholes, state of Utah.

My commission Expires: 9-11-2017

Commission Number: 670359

Address: 1670 E Millstone Cir

City: Enoch State: UT Zip: 84721

} ss:

Notary Public
MARTY NICHOLES
Commission #670359
My Commission Expires
Sept 11, 2017
State of Utah

For Office Use Only:	Assigned Tracking Number:	Received by Oil, Gas & Mining

Form DOGM- C1 (Revised December 10, 2007)

APPLICATION FOR COAL PERMIT PROCESSING
Detailed Schedule Of Changes to the Mining And Reclamation Plan

Permittee: Alton Coal Development, LLC
Mine: Coal Hollow Mine
Permit Number: C/025/0005
Title: Underground Coal Mine Amendment - Response to Deficiencies Task ID 4730

Provide a detailed listing of all changes to the Mining and Reclamation Plan, which is required as a result of this proposed permit application. Individually list all maps and drawings that are added, replaced, or removed from the plan. Include changes to the table of contents, section of the plan, or other information as needed to specifically locate, identify and revise the existing Mining and Reclamation Plan. Include page, section and drawing number as part of the description.

Add	Replace	Remove	DESCRIPTION OF MAP, TEXT, OR MATERIAL TO BE CHANGED
☐	☒	☐	Vol. 1 Chapter 1, TOC
☐	☒	☐	Vol. 1 Chapter 1, Page 1-8 through 1-13
☐	☒	☐	Vol. 2 Chapter 3, Pages 3-43
☐	☒	☐	Vol. 2 Chapter 4, Page 4-10 and 4-11
☐	☒	☐	Vol. 3 Chapter 5, TOC
☐	☒	☐	Vol. 3 Chapter 5, Page 5-1 through 5-84
☐	☒	☐	Vol. 3 Chapter 5, Appendix 5-9
☐	☒	☐	Vol. 6 Chapter 6, Page 6-7 through 6-24
☐	☒	☐	Vol. 7 Chapter 7, TOC
☐	☒	☐	Vol. 7 Chapter 7, Pages 7-1 through 7-103
☐	☐	☒	Vol. 8 Chapter 7, Appendix 7-10
☒	☐	☐	Vol. 8 Chapter 7, Appendix 7-15
☐	☒	☐	Vol. 7 Chapter 7, Pages 7-1 through 7-24
☐	☒	☐	Vol. 1 Chapter 2, Remove Drawings 2-2 & 2-2A and Replace with 2-2
☐	☒	☐	Vol. 2 Chapter 3, Remove Drawing 3-7 & 3-7A and Replace with 3-7
☐	☐	☒	Vol. 3 Chapter 5, Drawing Remove 5-2,5-2A,
☐	☒	☐	Vol. 3 Chapter 5, Drawing 5-3
☒	☐	☐	Vol. 3 Chapter 5, Drawing 5-3B
☐	☒	☐	Vol. 3 Chapter 5, Remove Drawing 5-9 & 5-9A and Replace with 5-9
☐	☒	☐	Vol. 3 Chapter 5, Remove Drawing 5-10, 5-10A, 5-10B, and Replace with 5-10
☐	☒	☐	Vol. 3 Chapter 5, 5-15
☐	☒	☐	Vol. 3 Chapter 5, Remove Drawing 5-16, 5-16A and Replace with 5-16
☐	☐	☒	Vol. 4 Chapter 5, 5-17, 5-18 and 5-19
☐	☒	☐	Vol. 5 Chapter 5, Remove Drawing 5-38, 5-38A and Replace with 5-38
☐	☒	☐	Vol. 5 Chapter 5, Drawing 5-30
☐	☒	☐	Vol. 8 Chapter 7, Drawing 7-2, 7-4, 7-5, 7-10, and 7-12
☐	☐	☐	
☐	☐	☐	

Any other specific or special instruction required for insertion of this proposal into the Mining and Reclamation Plan.	Received by Oil, Gas & Mining

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Chapter 1

R645-301-100

Legal, Financial, Compliance and Related Information

APPENDICES

DRAWINGS

Boulder City, NV 89005
702-293-4773

112.600 Owners of Record of Property Contiguous to Proposed Permit Area

Owners of surface properties contiguous to the proposed permit area are shown on Drawing 1-3 and the name and address of each such owner is as follows:

Department of the Interior, Bureau of Land Management
District and Regional Office
Salt Lake City, Utah

Darlynn and Arlene Sorensen
Orderville, Utah
435-648-2462

112.700 MSHA Numbers

The MSHA Mine Identification Number for the Coal Hollow Project is 42-02519.

112.800 Interest in Contiguous Lands

The applicant has interest in lands contiguous to the permit area. A Lease by Application (LBA) is currently being processed by the United States Department of the Interior, Bureau of Land Management, Salt Lake City, Utah.
Alton Coal Development, LLC, the sole party in interest, submitted the LBA application in September, 2004. The LBA is contiguous to the permit area and contains approximately 3,581 acres. Coal recovery within the LBA is amenable to both surface and underground mining. See Drawing 1-2 for LBA delineation.

In addition to the LBA application, Alton Coal Development, LLC also has property leased from C. Burton Pugh located east of the permit boundary. This property which is contiguous to the permit area, is part of a land tract (9-5-20-2) owned by Mr. Pugh that is split across the permit boundary and is located in Section 20, Township 30 South, Range 5 West. This entire tract was leased prior to the final determination of the Permit Boundary (9/10/04). The area leased from Mr. Pugh outside the Permit Boundary are not planned for development except for approximately 43 acres located in the SW¼, NW¼ Section 20 which is included as part of the LBA application. The 43 acres would possibly be developed for surface coal mining operations if the LBA mining rights are successfully acquired. Land tracts leased by Alton Coal Development, LLC within and contiguous to the permit area are identified on Drawing 1-3.

112.900 Certification of Submitted Information

After Alton Coal Development, LLC is notified that the application is approved, but before the permit is issued, Alton Coal will update, correct or indicate that no change has occurred in the information submitted under R645-301-112.100 through .800.

113 VIOLATION INFORMATION

Neither the applicant, affiliates, members or managers or persons controlled by or under common control with the applicant (including Charles Ungurean and Thomas Ungurean, as confirmed by the Applicant/Violator System (AVS) search, dated December 23, 2013) has: (i) had a federal or state mining permit suspended or revoked in the last five years; (ii) nor forfeited a mining bond or similar security deposited in lieu of a bond. Neither the applicant, affiliates, members or managers or persons controlled by or under common control with the applicant has received a violation during the last three year period. Compliance information on Ungurean's operations and the Coal Hollow Mine is attached at Appendix 1-10.

114 RIGHT OF ENTRY INFORMATION

Applicant bases its right to enter and begin coal mining activities in the permit area and the consent of the surface owner to extract coal by surface mining methods upon the following documents:

Lessor:	*Lessee:*
C. Burton Pugh	Alton Coal Development, LLC

Surface and Mineral Lease, dated 9/10/04; originally recorded 5/25/06

Lessor:	*Lessee:*
Roger M. Pugh	Alton Coal Development, LLC

Mineral Lease, dated 9/11/08; recorded 9/11/08

Lessor:	*Lessee:*
Margaret and Mark Moyers	Alton Coal Development, LLC

Mineral Lease, dated 6/26/08; recorded 7/21/08

Lessor:	*Lessee:*
Alecia Swapp Dame Trust	Alton Coal Development, LLC

Surface and Mineral Lease, dated 4/29/05; recorded 5/17/06
Mineral Lease, dated 10/23/13; recorded 10/23/13

Copies of these lease assignments are included in Appendix 1-2 located in the Volume 9, Confidential binder.

115 STATUS OF UNSUITABILITY CLAIMS

115.100 The permit area is not within an area or under study as an area designated as unsuitable for mining under R645-103-400, nor has any petitions been filed with the UDOGM under R645-103-420 that could affect the proposed permit area. The Coal Hollow Project is located on private lands adjacent to federal lands, which after careful consideration were declared suitable for mining in 1980 by then Secretary of Interior Andrus. Secretary's Decision, Petition to Designate Certain Federal Lands In Southern Utah Unsuitable for Surface Coal Mining, OSM Ref No. 79-5-001, dated December 16, 1980, copy attached at Appendix 1-3.

This petition was filed under the provisions of section 522(c) of the federal Surface Mining Control and Reclamation Act ("SMCRA"). OSM Notice, Receipt of a Complete Petition for Designation of Lands as Unsuitable for Surface Coal Mining Operations, 45 fed. Reg. 3398, Jan. 17, 1980, attached at Appendix 1-3.

Those federal lands in the Petition area found suitable for mining include lands adjacent to the private lands which the Project has included in a federal lease by application and located in Kane County, Utah within Township 39 South, Ranges 5 and 6 West, SLM. Secretarial Decision at Paragraph 4. The Secretarial Decision was based on an extensive Administrative Record, including the Petition filed under Section 533 of SMCRA, 30 U.S.C. Section 1272, public hearings, a combined petition evaluation document and environmental impact statement published in two volumes on November 26, 1980 as, "Southern Utah Petition Evaluation Document" and the "Southern Utah Petition Evaluation Document - Comments and Responses." The Secretarial Decision was further supported by a 52 page Statement of Reasons, dated January 13, 1981, attached at Appendix 1-3.

The Secretarial Decision was upheld by the federal court in *Utah International, Inc. v. Watt*, 553 F. Supp. 872 (D. Utah 1982).

115.300 Coal mining and reclamation activities at the Coal Hollow Project are not planned within 300 feet, measured horizontally, of an occupied dwelling or 100 feet of a public road. Drawing 1-5 shows the proximity of the Swapp Ranch to the planned operations. With the alternate highwall method, coal will be recovered by highwall mining beneath the Swapp Ranch. Engineering has been completed and incorporated into the plan such that subsidence does not occur to the surface.

116 PERMIT TERM

116.100 There are 3 mining phases associated with this permit term. The first phase of mining began on November 10, 2010. Phase 3 is anticipated to conclude in year 2017.

Acres of disturbance per Mining Phase

Phase 1	~~289~~ 250 acres
Phase 2	~~40~~ 54 acres
Phase 3	~~89~~ 38 acres

116.200 Permit Term

The Coal Hollow Mine Project is proposed for a 5-year term under the Permanent Regulatory Program for 5 years

117 INSURANCE, PROOF OF PUBLICATION

Proof of publication pursuant to R645-303-322 is included in Appendix 1-5.

117.100 <u>Certificate of Liability Insurance</u>

A copy of the Certificate of Liability Insurance is found in Appendix 1-4.

118 PERMIT FILING FEE

A copy of this permit is on file with the Utah Division of Oil, Gas and Mining (UDOGM), P.O. Box 145801, Salt lake City, Utah 84114-5801. A filing fee of $5.00 accompanied permit submittal.

120 PERMIT APPLICATION FORMAT AND CONTENTS

This permit application contains information and will comply with R645-301-120. A notarized statement attesting to the accuracy of this information is set forth at Appendix 1-6.

130 REPORTING OF TECHNICAL DATA

All technical data submitted in the permit application will be accompanied by the name or organization responsible for the collection and analysis of data, dates of collection and descriptions of methodology used. Technical analyses will be planned by or under the direction of a qualified professional in the subject to be analyzed.

The following assisted or were consulted in the preparation of this permit application:

State of Utah, Department of Natural Resources
Division of Oil, Gas and Mining
Salt Lake City, Utah

Department of the Interior, Bureau of Land Management
District and Regional Office
Kanab and Salt Lake City, Utah

United States Geological Survey, Utah Region
Salt Lake City, Utah

United States Department of Agriculture
Natural Resources Conservation Service
Salt Lake City, Richfield and Cedar City, Utah

State of Utah, Department of Natural Resources Dr. James E. Nelson

Division of Wildlife Resources (DWR)
Salt Lake City, Price and Cedar City, Utah

Dr. Patrick D. Collins
Mt. Nebo Scientific Research & Consulting
Springville, UT

Erik Petersen, P.G.
Petersen Hydrologic, LLC
Lehi, UT

John T. Boyd Company
James Boyd
Mining & Geological Consulting
Canonsburg, PA

John T. Boyd Company
Rich Bate
Mining & Geological Consulting
Denver, CO

Keith Montgomery
Montgomery Archaeological
Moab, UT
Dr. Stephen Petersen
Philomath, OR

Larry Hayden-Wing
Hayden-Wing Associates, LLC
Laramie, WY

Mark Page
Water Rights Consultant
Price, UT

D.A. Smith Drilling
Loma, CO

Kane County
76 North Main
Kanab, UT

Heaton Livestock
PO Box 100773
Alton, UT

Brigham Young University
Provo, UT

Talon Resources, Inc
Huntington, UT

C. Burton Pugh
Lindon, UT

Richard Dame
Boulder City, NV

University of Miami
Miami, FL

Geochron Laboratories
Cambridge, MA

Energy Labs
Billings, MT

Taylor Geo-Engineering
Alan O. Taylor
Lehi, UT

Long Resource Consultants
Robert E. Long
Morgan, UT

JBR Environmental, Inc.
Dawn Whaley
Sandy, UT

Bruce Chesler
Escalante, UT

A.H. Hamblin
Paleontogical Consulting
Cedar City, UT

Patricia Stavish
Montgomery Archeological
Moab, UT

Mike Shurtz, C.E.T
AGEC
Cedar City, UT

Byron Caton
SGS North America, Inc
Denver, CO

Inter-Mountain Laboratories
Karen Secor
1673 Terra Avenue
Sheridan, WY

Glenn Grossman
Will Spitzenberg, P.E.
Boss Engineering
Pleasant Grove, UT

Tom Campbell
TerraTek
Salt Lake City, UT

140 DRAWING AND PLANS

The Drawing and plans in the Mining and Reclamation Plan are submitted consistent with the requirement of R645-301-140.

150 COMPLETENESS

Alton Coal Development, LLC represents that the information contained in the Coal Hollow Mining and Reclamation Plan permit application to be complete and correct.

332. **SUBSIDENCE**

~~Because mining in the Coal Hollow Project area will be a surface operation, either open pit or highwall mining, and subsidence is usually associated more with underground mining, it is not considered a factor for the Coal Hollow Project. The alternate Highwall mining is designed such that subsidence does not occur to the surface with nonyieldable webs and barriers.~~Mining in the Coal Hollow project area will be a combination of surface mining, either open pit or highwall mining and underground mining. Both the highwall mining and underground mining are designed such that subsidence is not expected to occur or have a negative impact on renewable resource lands. This is further discussed in Section 525 of Chapter 5. As indicated in that Section, no subsidence is projected and no monitoring is planned. As requested by the Division, however, the company will conduct surface observations walkovers of each of the 4 developed panel areas in this proposed plan within 60 days of completion of mining in those areas. If the observations determine that no affects or voids have developed to the surface, it will be documented and forwarded to the Division. If surface cracking, sinkholes or other surface impacts are noted during the walkovers, they will be documented, located on a surface topographic map, reported to the Division, photographed and repaired after approval by the Division.

Also, based on the proposed underground mining plan, and as discussed in Appendix 7-15 (Probable Hydrologic Consequences for Underground Coal Mining at the Alton Coal Development, LLC Coal Hollow Mine) there are mo likely adverse effects to the hydrologic regime in the area. However, in the event that diminution of discharge rates from seeps and springs does occur as a consequence of mining activities, any lost water will be replaced according to all applicable Utah State laws and regulations, using the water replacement source specified in R645-301-727. The quantity and quality of replacement water detailed in that Section, will be suitable for the existing premining uses and approved postmining land uses.

However, current elevation of the existing topography may be slightly altered in the mining and reclamation operations with open pit mining. The alternate Highwall mining or underground mining will have only the disturbance associated with the trench for placement of the highwall miner or portals and will have no impact on the surface above the highwall panels

Reclamation has been planned to minimize the impact to the renewable resources identified in this section by promptly reclaiming each mine segment contemporaneously by controlling erosion and re-seeding with a mixture of native plant species that will re-establish the plant communities to vegetative cover that will be diverse, effective, permanent, and consistent with the postmining land use. More details regarding postmining land and topography have been provided in Chapter 4 and Chapter 5 of this document, respectively.

The mine plan is not expected to negatively impact the plants and wildlife in the Coal Hollow Project area. Onsite revegetation research and sage-grouse mitigation plans have been designed. Details of this work have been made available to DOGM specialists for their comments and participation in the process.

413.300. Criteria for Alternative Postmining Land Uses

Other than improvements to the existing land described above, the land will be returned to its pre-mining conditions.

420 AIR QUALITY

421 CLEAN AIR ACT

Coal mining and reclamation operations will be conducted in compliance with the requirements for the Clean Air Act and Any other applicable Utah or Federal statutes and regulations containing air quality standards.

422 UTAH BUREAU OF AIR QUALITY

Alton Coal Development, LLC has retained JBR Environmental Consultants to prepare a Notice of Intent (NOI) for a new source at the Coal Hollow Project. The original NOI was submitted to the Utah Division of Air Quality (UDAQ) on May 8, 2007. This NOI provided an initial assessment of air emissions for the project based on the MRP prior to being determined Administratively Complete. JBR coordinated preparation of the original NOI with Tom Bradley and Jon Black of the UDAQ. In September 2008, JBR began development of a revised NOI to include air dispersion modeling. This air dispersion modeling was coordinated with Dave Prey of UDAQ. A conference call was conducted with representatives of UDAQ, JBR and Alton Coal on December 8th, 2008 to discuss modeling inputs, background emissions and preliminary modeling results. The revised NOI was submitted on April 20, 2009 . UDAQ responded to the NOI on June 23, 2009 by asking for additional information. The Fugitive Dust Control Plan is provided as Appendix 4-5. Alton Coal was issued by the Executive Secretary of the Utah Air Quality Board Approval Order DAQE-AN0140470002-10 for a new source on November 10, 2010. After consultation with Jon Black, an NOI dated August 22, 2013 was submitted to UDAQ, Alton Coal requested addition of a highwall miner to list of mobile equipment in use at the Coal Hollow Mine. On November 12, 2014 prior to beginning underground operations, Jon Black of the UDAQ was consulted with the proposed underground plans. An NOI was sent to UDEQ on November 17, 2014 listing the additional equipment and increase in pollutants anticipated with the operation of the underground mine. The revised Approval Order (AO) is anticipated by the first of February 2015.

423.100- 200 AIR POLLUTION CONTROL PLAN

Production rates at the Coal Hollow Mine are expected to exceed 1,000,000 tons of coal per year. Appendix 4-5 provides a Fugitive Dust Control Plan (FDCP). This plan includes controls and monitoring measures that will be taken to minimize air pollution related specifically to fugitive dust.

424 **PLAN FOR FUGITIVE DUST CONTROL PRACTICES**

Proposed mining will exceed 1,000,000 tons annually. A Fugitive Dust Control Plan is provided as Appendix 4-5.

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R645-301-500

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Facilities (5-3 to 5-8C)

Coal Recovery (5-9 to 5-14)

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Geotechnical (5-39)

Highwall Mining Details (5-41 to 5-44)

CHAPTER 5

R645-301-500. ENGINEERING

510. **INTRODUCTION**.

The engineering section of the Mining and Reclamation Plan (MRP) is divided into the operation plan, reclamation plan, design criteria, and performance standards. All of the activities associated with the coal mining and reclamation operations are designed, located, constructed, maintained, and reclaimed in accordance with the operation and reclamation plan.

511. **GENERAL REQUIREMENTS**

511.100 - 511.300. <u>Contents</u>

The operation and reclamation permit application includes descriptions of the coal mining and reclamation operations with attendant Drawings, plans, and cross sections. and its potential impacts to the environment as well as methods and calculations utilized to achieve compliance with design criteria.

All this information can be viewed in this section, Drawings 5-1 through 5-44 and Appendices 5-1 through 5-7.

512. **CERTIFICATIONS**

512.100. <u>Cross Sections and Drawings.</u>

All cross sections and Drawings required under applicable portions of sections 512.100 through 512.150 have been prepared by, or under the direction of, and certified by: a qualified, registered, professional engineer; a professional geologist; or a qualified, registered, professional land surveyor, with assistance from experts in related fields such as hydrology, geology and landscape architecture.

Compliance with this section has been completed and certifications are available on all cross sections and Drawings.

512.200. <u>Plans and Engineering Designs.</u>

All plans for excess spoil, durable rock fills, coal mine waste, impoundments, primary roads and variances from approximate original contour will be certified by a qualified registered professional engineer.

Plans for excess spoil, sediment impoundments, primary roads, and a variance from approximate original contour have been certified by a qualified registered professional engineer. These certifications can be viewed on Drawings 5-22 through 5-37. No coal mine waste or durable rock fills are planned.

512.210 Excess Spoil Disposal Areas

A professional engineer experienced in the design and construction of earth and rock fills will certify the design of Excess Spoil Disposal Areas according to 535.100.

A professional engineer with experience in design and construction of earth and rock fills has certified the design of the Excess Spoil Disposal according to 535.100. An expert in the field of slope stability and geotechnical analysis has provided a thorough review of the design. This analysis can be viewed in Appendix 5-1.

512.220 - 230 Durable Rock Fills and Coal Mine Waste Structures

The MRP does not contemplate the construction of any permanent Durable Rock Fills or Coal Mine Waste structures. If such structures become part of the plan, a professional engineer experienced in the design of earth and rock fills and or disposal facilities will certify the design according to 535.100 - 536.

512.240. Impoundments.

A professional engineer experienced in the design and construction of impoundments will use current, prudent, engineering practices and will certify the design of the impoundment according to 743.

A professional engineer experienced in the design and construction of impoundments with assistance from a geotechnical expert has used current, prudent, engineering practices to design the proposed impoundments. The plans have been certified and a detailed geotechnical analysis has been provided. The certifications and drawings can be viewed in Drawings 5-25 through 5-31 and Appendices 5-1 and 5-2.

512.250. Primary Roads.

A professional engineer will certify the design and construction or reconstruction of primary roads as meeting the requirements of 742.420.

Designs of primary roads have been certified as meeting the requirements of 742.420.

512.260. Variance From Approximate Original Contour.

In areas of the MRP where a variance from the approximate original contour is required, a professional engineer will certify the design for the proposed variance from the approximate original contour, as described under 270, in conformance with professional *standards established to assure the stability, drainage and configuration necessary for the intended use of the site.*

A variance from the approximate original contour has been certified in conformance with professional standards to assure the stability, drainage and configuration necessary for the intended use of the site.

513. **COMPLIANCE WITH MSHA REGULATIONS AND MSHA APPROVALS.**

513.100. Coal Processing Waste Dams and Embankments

The MRP does not contemplate the construction of any coal processing waste dams and embankments.

513.200. Impoundments and Sedimentation Ponds

No impoundments or sedimentation ponds meeting the size or other qualifying criteria of MSHA, 30 CFR 77.216(a) exist or are planned within the proposed Mine Permit Area. Should impoundments and sedimentation ponds meeting the size or other qualifying criteria of MSHA, 30 CFR 77.216(a) become necessary, compliance with the requirements of MSHA, 30 CFR 77.216 will be met.

513.300. Disposal of Underground Development Waste, Coal Processing Waste and Excess Spoil in underground mine workings.

The MRP does not contemplate any underground development waste, coal processing waste, or excess spoil being disposed of in underground mine workings.

513.400. Refuse Piles

The MRP does not contemplate the construction of any refuse piles.

513.500. Capping, Sealing and Backfilling Openings to the Surface from the Underground.

Each shaft, drift, adit, tunnel, exploratory hole, entryway or other opening to the surface from the underground will be capped, sealed, backfilled or otherwise properly managed consistent with MSHA, 30 CFR 75.1711 and requirements of R645-301-513, R645-301-529 and R645-301-551.

Underground mine portals are located in the bottom of Pit 10, and will ultimately be reclaimed by the backfilling of the pit to a depth of 100 + when no longer required.

All wells will be managed to comply with R645-301-748 and R645-301-765. Water monitoring wells will be managed on a temporary basis according to R645-301-738.

Wells constructed for monitoring groundwater conditions in the proposed Coal Hollow Mine permit and adjacent area, including exploration holes and boreholes used for water wells or monitoring wells, will be designed to prevent contamination of groundwater and surface-water resources and to protect the hydrologic balance. A diagram depicting typical monitoring well construction methods is shown in Figure 7-11. Monitoring wells will include a protective hydraulic seal immediately above the screened interval, an annular seal plugging the borehole above the hydraulic seal to near the ground surface, and a concrete surface seal extending from the top of the hydraulic seal to the ground surface which is sloped away from the well casing to prevent the entrance of surface flows into the borehole area. Well casings will protrude above the ground surface a sufficient height so as to minimize the potential for the entrance of surface water or other material into the well. A steel surface protector with a locking cover will be installed at monitoring wells to prevent access by unauthorized personnel. Where there is potential for damage to monitoring wells, the wells will be protected through the use of barricades, fences, or other protective devices. These protective devices will be periodically inspected and maintained in good operating conditions. Monitoring wells will be locked in a closed position between uses.

When no longer needed for monitoring or other use approved by the Division upon a finding of no adverse environmental or health and safety effects, or unless approved for transfer as a water well under R645-301-731.100 through R645-301-731.522 and R645-301-731.800, each well will be capped, sealed, backfilled, or otherwise properly managed, as required by the Division in accordance with R645-301-529.400, R645-301-631.100, and R645-301-748. Permanent closure measures will be designed to prevent access to the mine workings by people, livestock, fish and wildlife, machinery and to keep acid or other toxic drainage from entering ground or surface waters.

If a water well is exposed by coal mining and reclamation operations, it will be permanently closed unless otherwise managed in a manner approved by the Division.

Permanent closure and abandonment of water wells greater than 30 feet in depth will be in accordance with the requirements of “Administrative Rules for Water Well Drillers”, State of Utah, Division of Water Rights or other applicable state regulations. Abandonment of wells will be performed by a licensed water well driller. The wells to be abandoned will be completely filled using neat cement grout, sand cement grout, unhydrated bentonite, or bentonite grout, or other materials approved by the Utah State Engineer’s office. Alternatively, the well may be abandoned using a different procedure upon approval from the Utah State Engineer’s office.

Abandonment materials will be introduced at the bottom of the well or required sealing interval and placed progressively upward to the top of the well. The casing will be severed a minimum of 2 feet below the ground surface. A minimum of 2 feet of compacted native material will be placed above the abandoned well upon completion.

Within 30 days of the completion of well abandonment procedures, a report will be submitted to the State Engineer by the responsible licensed driller giving data related to the abandonment of the well. This shall include the name of the licensed driller or other person(s) performing abandonment procedures, name of well owner at the time of abandonment, the address or location of the well by section, township, and range, abandonment materials and equipment used, water right or file number covering the well, the final disposition of the well, and the date of completion.

Exploration holes and boreholes will be backfilled, plugged, cased, capped, sealed, or otherwise managed to prevent acid or toxic contamination of water resources and to minimize disturbance to the prevailing hydrologic balance. Exploration holes and boreholes will be managed to ensure the safety of people, livestock, fish and wildlife, and machinery.

If a water well is exposed by coal mining and reclamation operations, it will be permanently closed unless otherwise managed in a manner approved by the Division.

If any exploration boreholes are to be used as monitoring wells or water wells, these will meet the provisions of R645-301-731

Boreholes will be backfilled to within 1 foot of the land surface with concrete or other materials approved by the Division as necessary to prevent contamination of groundwater or surface-water resources or to protect the prevailing hydrologic balance. The upper approximately 1 foot will be backfilled with native materials to facilitate reclamation (see Drawing 6-11). Exploration holes and boreholes that may be uncovered during mining and reclamation activities will be permanently closed unless approved for water monitoring or otherwise managed in a manner approved by the Division.

513.600. Discharges into an underground mine

The MRP does not contemplate discharges into an underground mine.

513.700. Surface Mining Closer than 500 Feet to an Active Underground Mine

The MRP does not contemplate mining within 500 feet of an active underground mine.

513.800. Coal Mine Waste Fires

The MRP does not contemplate the generation of any coal mine waste.

514. **INSPECTIONS**

All engineering inspections, will be conducted by a qualified registered professional engineer or other qualified professional specialist under the direction of the professional engineer.

514.100 Excess Spoil.

The professional engineer or specialist will be experienced in the construction of earth and rock fills and will periodically inspect the fill during construction. Regular inspections will also be conducted during placement and compaction of fill materials.

The construction method for the excess soil specified in 528.310 is expected to meet the 85% compaction standard. As verification, the fill compaction will be periodically field tested using method(s) as directed by the qualified registered professional engineer. A description of the test method and the test results will be provided to the Division as part of the quarterly inspection reports.

514.110. Such inspections will be made at least quarterly throughout construction and during critical construction periods. Critical construction periods will include at minimum:

514.111. Foundation preparation, including the removal of all organic material and topsoil;

514.112. Placement of underdrains and protective filter systems.

No underdrains or protective filter systems are planned as part of the excess spoil.

514.113. Installation of final surface drain systems; and

514.114. The final graded and revegetated fill.

514.120. The qualified registered professional engineer will provide a certified report to the Division promptly after each inspection that the fill has been constructed and maintained as designed and in accordance with the approved plan and the R645-301 and R645-302 Rules. The report will include appearances of instability, structural weakness, and other hazardous conditions.

514.200 - 250. Refuse Piles.

The MRP does not contemplate the construction of any refuse piles.

514.300. Impoundments.

514.310 - 313. Certified Inspection.

A professional engineer or specialist experienced in the construction of impoundments will inspect impoundments. Inspections will be made regularly during construction, upon completion of construction, and at least yearly until removal of the structure or release of the performance bond. The qualified registered professional engineer will promptly, after each inspection, provide to the Division, a certified report that the impoundment has been constructed and maintained as designed and in accordance with the approved plan and the R645 Rules. The report will include discussion of any appearances of instability, structural weakness or other hazardous conditions, depth and elevation of any impounded waters, existing storage capacity, any existing or required monitoring procedures and instrumentation and any other aspects of the structure affecting stability. A copy of the report will be retained at or near the mine site.

514.320. Inspection Standard and Frequency

The MRP does not contemplate construction of any impoundments meeting the NRCS Class B or C criteria for dams in TR-60, or the size or other criteria of 30 CFR Sec. 77.216. If such impoundments become necessary, they will be examined in accordance with 30 CFR Sec. 77.216-3. Impoundments not meeting the NRCS Class B or C Criteria for dams in TR-60, or subject to 30 CFR Sec. 77.216, will be examined at least quarterly. A qualified person designated by Alton Coal Development LLC will examine impoundments for the appearance of structural weakness and other hazardous conditions.

515. **REPORTING AND EMERGENCY PROCEDURES**

515.100. Slides

Any time a slide occurs which may have a potential adverse effect on public, property, health, safety, or the environment, Alton Coal Development LLC will notify the Division by the fastest available means and comply with any remedial measures required by the Division.

515.200. Impoundment Hazards.

If any examination or inspection of an impoundment discloses that a potential hazard exists, the person who examined the impoundment will promptly inform the Division of the finding and of the emergency procedures formulated for public protection and remedial action. If adequate procedures cannot be formulated or implemented, the Division will be notified immediately.

515.300. Temporary Cessation

515.311

During a temporary cessation of the Underground operations, surface access openings to underground operations and facilities in areas in which there are no current operations, but in which operations are to be resumed under an approved permit will be effectively secured.

515.312.

During a temporary cessation, surface facilities in areas in which there are no current operations, but in which operations are to be resumed under an approved permit will be effectively secured.

515.320.

Before temporary cessation of coal mining and reclamation operations for a period of 30 days or more, or as soon as it is known that a temporary cessation will extend beyond 30 days, a notice of intention to cease or abandon operations will be submitted to the division. This notice will include:

- A statement of the exact number of acres which have been affected in the permit area prior to such temporary cessation,
- The extent and kind of reclamation of those areas which has been accomplished, and
- Identification of the backfilling, regrading, revegetation, environmental monitoring, and water treatment activities that will continue during the temporary cessation.

515.321.

Before temporary cessation of coal mining and reclamation operations for a period of 30 days or more, or as soon as it is known that a temporary cessation will extend beyond 30 days, a notice of intention to cease or abandon operations will be submitted to the division. This notice will include:

- A statement of the exact number of acres which have been affected in the permit area prior to such temporary cessation,

- The extent and kind of reclamation of those areas which has been accomplished, and

Identification of the backfilling, regrading, revegetation, environmental monitoring, and water treatment activities that will continue during the temporary cessation.

516. **PREVENTION OF SLIDES**

The moderate topography in the area of the planned Coal Hollow Mine will minimize the potential for unplanned slides. A natural barrier will, however, be left undisturbed except as necessary for roads, sedimentation control, temporary topsoil and spoil storage and similar features, beginning at the elevation of the coal seam and extending from the outslope for a distance of at least 50 ft. The barrier will be retained in place to prevent slides and erosion.

520. **OPERATION PLAN.**

521. **GENERAL.**

The proposed Coal Hollow Mine is located approximately 2.5 miles south of Alton, Utah. In order to maximize the use and conservation of the coal resource, coal will be recovered using large hydraulic excavators, front end loaders, off-road trucks, underground miner and highwall miner. Mined coal will be hauled to a central coal area for crushing and placement into a stockpile. Coal from the stockpile will be transferred into a bin and loaded into over the road trucks for transport.

The plan, with Drawings, cross sections, narrative, descriptions, and calculations indicates how the relevant requirements will be met. The lands subject to coal mining and reclamation operations over the estimated life of the operations are identified and briefly described. All appropriate information is located in the subsequent sections and Drawings 5-1 through 5-44 and Appendices 5-1 through 5-~~8~~9. Topsoil piles and removal sequencing is shown on Drawing 2-2.

521.100. Cross Sections and Drawings.

The application includes cross sections, Drawings and plans showing all the relevant information required by the Division. Appropriate information is provided in Drawings and cross sections 5-1 through 5-44.

521.110. Previously Mined Areas.

Historically, there has been some underground mining of coal within the Alton Amphitheater. The following underground mines are known to have historically existed within the Amphitheater:

- Seaman Mine
- Smirl Mine
- Alton Mine
- Johnson Mine
- Silver Mine

There are not any known mines that existed or currently exist within the permit area or the adjacent area as defined in R645-100-200. There is also not any active coal mining operations in the area.

521.120. Existing Surface and Subsurface Facilities and Features.

521.121. Buildings

The location of all buildings in and within 1,000 feet of the proposed permit area, with identification of the current use of the buildings is shown on Drawings 1-5 and 1-6.

521.122. Surface and Subsurface Man-Made Features

The only known surface and subsurface manmade features that exist within the permit area are:

- County Road 136 (location shown on Drawing 5-3)
- Water pipeline to Pond 20-1 (location shown on Drawing 7-7)

521.123. Public Roads

One Class B public road, Kane County Road 136 (K3900) is located in or within 100 feet of the proposed permit area and is shown on Drawing 5-3. This road will be temporarily relocated outside the permit area until mining is complete and then reconstructed. In addition, Kane County has recently made a claim on the two-track road located adjacent to Lower Robinson Creek which is also located within the permit boundary. This road has mostly been closed to the public since it crosses private land and ACD has worked with Kane County to develop an access agreement which includes access through the permit area by mine personnel escort only. This agreement is included as Appendix 1-8 in Chapter 1. The County has named this Class D public road K3993.

The details for reestablishing road K3900 is shown on Drawings 5-22E, 5-22F and 5-22H. The details related to reestablishing K3993 following mining is shown on Drawing 5-22C.

521.124. Existing areas of spoil, waste, coal development waste, and noncoal waste disposal, dams, embankments, other impoundments, and water treatment and air pollution control facilities.

There are three impoundments currently located within the permit area which are Pond 20-1, Pond 29-3 and Pond 29-5 shown on Drawing 7-7. The area of these impoundment are approximately 3,400, 10,500 and 6963 square feet respectively.

There no other areas of existing spoils, waste, coal development waste, and noncoal waste disposal, dams, embankments, other impoundments, and water treatment and air pollution control facilities within the permit area.

521.125. Ponds and Other Impoundments

The MRP does not contemplate construction of any permanent water impoundments; coal processing waste banks and coal processing waste dams or embankments. The planned location of each sedimentation pond is shown on Drawing 5-3.

521.130. Landowners and Right of Entry and Public Interest Drawings.

All boundaries of lands and the names of present owners of record of both surface and subsurface within the Mine Permit Area are shown on Drawing 1-3 (Surface) and Drawing 1-4 (Subsurface).

521.132. Permit Boundary

The boundaries of land within the proposed permit area are shown on all applicable Drawings.

521.133. Public Roads

No mining or reclamation operations are planned within 100 ft. of a public road. However mine vehicles may cross the right-of-way of Kane County Road #136 for a short period early in the operation’s life. Appropriate measures, including signage and mine operating practices and training will be implemented to protect the public.

521.133.2 Relocating a Public Road:

The design of any relocated road will be approved by Kane County authorities, or such other authorities as have jurisdiction. Appropriate measures will be taken to prevent entrance into the mining area via the pre-existing road, and appropriate signage and barriers will be installed to protect the public.

521.140. Mine Drawings and Permit Area Drawings.

521.141 The boundaries of all areas proposed to be affected over the estimated total life of the coal mining and reclamation operations, with a description of size, sequence and timing of the mining, the coal mining and reclamation operations to be conducted, the lands to be affected throughout the operation, and changes in facilities or features to be caused by the proposed operations;

These items are depicted on Drawings 5-1 through 5-44.

Two options are provided for final reclamation of the permit area. The Preferred option is shown on Drawings 5-35 and 5-36. The anticipated time schedule for this option is shown on Drawing 5-38. This option includes mining operations transitioning into the adjacent federal coal reserves. In the case that these reserves are not acquired by ACD, an alternative plan is provided in Drawing 5-37 and 5-37A which requires rehandling much of the fill above original contour to fill in the final pits.

If a circumstance occurs where mining of the permit area is complete and ACD has acquired the federal lease but permit approval has not yet been acquired to continue mining in the federal coal reserves; ACD requests that the Division consider a temporary cessation of operations at that time rather than requiring implementation of the alternate reclamation scenario. This temporary cessation could be granted for a sufficient period of time to allow ACD to acquire approval for transitioning mining operations into the adjacent federal coal reserves. The Division does have the authority to grant such an allowance based on R645-301-515.300. Should the alternative reclamation scenario be implemented prematurely, reclamation along the western side and south end of the permit area will either be excavated to recover coal or these coal reserves beneath and adjacent to the reclamation will be unrecoverable. Also, an additional excess spoil structure will have be constructed for the boxcut for the federal reserves. A detailed description of the two reclamation scenarios and how each scenario would apply is provided in Section 528.200 Overburden and 553 Backfilling and Grading of this Chapter.

If ACD does not acquire the federal coal lease by the time that the final pit is complete, ACD will then immediately transition the reclamation plan to the alternative scenario.

~~Additionally, two options are provided for surface mining of the permit area. The Preferred option is shown on Drawings 5-2, 5-9, 5-10, and 5-16. The anticipated time schedule for this option is shown on Drawing 5-38. This option shows coal recovery through traditional open pit operations with coal being recovered by hydraulic excavators or loader and off-road trucks. In the case that ACD acquires a highwall mining system, an optional plan is provided in Drawing 5-2A, 5-9A, 5-10A and 5-16A. The estimated time schedule for this option is shown on Drawing 5-38A. This option shows coal~~

~~recovery through traditional open pit operations with coal being recovered by a highwall mining system, loader and off-road trucks. Under this option surface disturbance will be considerably less.~~

Underground mining is also proposed for this site. Mine portals will be within an existing pit and coal will be loaded within the pit and hauled in the same manner as with the surface mining. Underground mining plans are shown in Drawings 5-3, 5-3B, 5-9 and 5-10.

~~The optional plan is provided with the anticipation that a highwall mining system will be employed. The stage at which it begins will be determined by the arrival date of the highwall miner and conditions favorable to highwall mining.~~

521.142

Drawing 5-10 shows the underground workings. All underground coal mining will be first mining only. Subsidence will be prevented by following the recommendations provided in the Norwest Corporation letter report found in Appendix 5-9.

521.143 The proposed disposal sites for placing excess spoil generated at surface areas affected by surface operations, underground operations and facilities for the purposes COAL MINING and RECLAMATION ACTIVITIES according to:

- *R645-301-211: The applicant will present a description of the premining soil resources as specified under R645-301-221. Topsoil and subsoil to be saved under R645-301-232 will be separately removed and segregated from other material.*

  The soil resources for the proposed excess spoil disposal area are described in Appendix 2-1. A plan has been developed for removal of topsoil and suitable subsoil based on the soil descriptions in this appendix. The handling plan can be viewed on Drawing 2-2. Topsoil and acceptable subsoil will be separately removed and segregated from other material prior to placement of any spoil.

- *R645-301-212: After removal, topsoil will be immediately redistributed in accordance with R645-301-242, stockpiled pending redistribution under R645-301-234, or if demonstrated that an alternative procedure will provide equal or more protection for the topsoil, the Division may, on a case-by case basis, approve an alternative;*

Excess spoil will have topsoil and subsoil redistributed in an approximately uniform, stable thickness with the approved post mining land use, contours and surface water drainage systems. Material handling practices will prevent excess compaction of these materials. Handling practices will also protect the materials from wind and water erosion before and after seeding and planting.

- *R645-301-412.300: Criteria for Alternative Postmining Land Uses.*

  The MRP does not contemplate alternative postmining land uses.

- *R645-301-512.210: Excess Spoil. The professional engineer experienced in the design of earth and rock fills will certify the design according to R645-301-535.100.*

  A professional engineer experienced in the design of earth and rock fills with assistance from a geotechnical expert has certified the design according to R645-301-535.100. These certifications can be viewed on Drawings 5-35, 5-36 and 5-17~~ through 5-19~~.

- *R645-301-512.220: Durable Rock Fills*

  No durable rock fills are planned.

- *R645-301-514.100: Excess Spoil. The professional engineer or specialist will be experienced in the construction of earth and rock fills and will periodically inspect the fill during construction. Regular inspections will also be conducted during placement and compaction of fill materials.*

  A professional engineer or specialist that is experienced in the construction of earth and rock fills will inspect the fill during construction and regular inspections will also be conducted during placement and compaction of fill materials.

- *R645-301-528.310: Excess spoil will be placed in designated disposal areas within the permit area, in a controllable manner to ensure mass stability and prevent mass movement during and after construction. Excess spoil will meet the design criteria of R645-301-535. For the purposes of SURFACE COAL MINING AND RECLAMATION ACTIVITIES, the permit application must include a description of the proposed disposal site and the design of the spoil disposal structures according to R645-301-211, R645-301-212, R645-301-412.300, R645-301-512.210, R645-528.310, R645-301-535.100 through R645-301-535.130, R645-301-535.300 through R645-301-535.500, R645-536.300, R645-301-542.720, R645-301-553.240, R645-301-745.100, R645-301-745.100, R645-301-745.300, and R645-301-745.400.*

  Excess spoil will be placed in the area designated on Drawing 5-3 and 5-35. This fill will be placed in lifts not to exceed 4 feet. The material will be transported from the overburden removal area to the fill by end dump haul trucks and a dozer(s) will spread the spoil to this lift thickness. The fill will meet at minimum 85% compaction as related to the standard Procter. Final slopes will be regraded to a maximum slope of 3h:1v. The top of the fill will be sloped to approximately 2% to prevent pooling of water and to reestablish drainage similar to original flow patterns. The excess spoil placed on the non-mined areas is approximately 32 acres and varies in height from 35 to 110 feet. The area of excess fill over mined out areas (variance from approximate original contour) is an extension of the fill placed on the non-mined area and is approximately 55 acres. Combined acreage of the excess fill placed on mined and non-mined areas is 87 acres and varies in height from 60 to 100 feet above original contour. Total excess fill is 8.6 million yards. Design of this fill can be viewed in Drawings 5-35 through 5-36 and the geotechnical study can be viewed in Appendix 5-1.

- *R645-301-535.100 through R645-301-130: Disposal of Excess Spoil*

  A geotechnical analysis of the excess spoil structure design has been completed by an expert in this field. The long term static safety factor for this structure design is estimated at 1.6 to 1.7. Lifts will be placed in thicknesses not to exceed 4 feet. The lifts will meet 85% compaction by the standard Procter. The fill will be graded to allow for drainage similar to original patterns and to prevent excessive infiltration of water. Fill will be covered with subsoil and topsoil as specified in Chapter 2 to provide conditions suitable for revegetation of the area. The geotechnical study can be viewed in Appendix 5-1.

- *R645-301-535.300 through R645-301-535.500: Disposal of Excess - Spoil Durable Rock Fills.*

  No durable rock fills are planned.

- *R645-301-536.300: Disposal of Coal Mine Waste in Excess Spoil*

  No coal mine waste is planned in the excess spoil area.

- *R645-301-542.720: Excess spoil will be placed in designated disposal areas within the permit area, in a controlled manner to ensure that the final fill is suitable for reclamation and revegetation compatible with the natural surroundings and the approved postmining land use. Excess spoil that is combustible will be adequately covered with noncombustible material to prevent sustained combustion. The reclamation of excess spoil will comply with the design criteria under R645-301-553.240.*

  The excess spoil as shown in Drawing 5-35 and 5-36 will be suitable to the surrounding area and for the postmining land use of primarily grazing. No combustible excess spoil will be placed in the proposed structure. The reclamation of the spoil does not include any terraces and the slopes will not exceed 3h:1v.

- *R645-301-553.240: The final fill configuration of the fill (excess spoil) will be suitable for the approved postmining land use. Terraces may be constructed on the outslope of the fill if required for stability, control of erosion, to conserve soil moisture, or to facilitate the approved postmining land use. The grade of the outslope between terrace benches will not be steeper than 2h:1v (50 percent).*

  The excess spoil as shown in Drawings 5-35 and 5-36 will be suitable to the surrounding area and for the postmining land use of primarily grazing. The reclamation of the spoil does not include any terraces and the slopes will not exceed 3h:1v. The long term static safety factor for these slopes is estimated to be 1.6 to 1.7.

- *R645-301-745.100: General Requirements.*

  745.110: Excess Spoil will be placed in designated disposal areas within the permit area, in a controlled manner to:

  745.111: Minimize the adverse effects of leaching and surface water runoff from the fill on surface and underground water;

  Reclamation of the excess spoil will include topsoil and a subsoil layer. Infiltration through the reclamation is expected to be minimal based on the high clay content of these soils. In addition, laboratory data for the overburden shows that there is minimal potential for leaching of pollutants should infiltration rates become higher than expected.

  The foundation of the excess spoil area also has high clay content with minimal potential for infiltration. This will provide an additional, natural barrier to protect ground water present beneath the proposed structure.

  745.112: Ensure permanent impoundments are not located on the completed fill. Small depressions may be allowed by the Division if they are needed to retain moisture or minimize erosion, create and enhance wildlife habitat or assist revegetation, and if they are not incompatible with the stability of the fill; and

  Permanent impoundments are not planned on the excess spoil area. Small depressions may be constructed as allowed by the Division to retain moisture, minimize erosion, create and enhance wildlife habitat or assist revegetation.

  745.113: Adequately cover or treat the excess spoil that is acid- and toxic forming with nonacid nontoxic material to control the impact on the surface and ground water in accordance with R645-301-731.300 and to minimize adverse effects on plant growth and approved postmining land use.

Laboratory data representative of the overburden planned for disposal in the excess spoil area does not show acid- and toxic forming characteristics.

745.120: Drainage Control. If the disposal area contains springs, natural or manmade water courses, or wet weather seeps, the fill design will include diversions and underdrains as necessary to control erosion, prevent water infiltration into the fill and ensure stability.

A spring and seep survey available in Chapter 7 has identified no springs or wet weather seeps in the proposed excess spoil area. The final surface will be regraded to a contour that will route water from snowmelt and rainfall around the excess spoil as shown on the final contours Drawing 5-35. There are no manmade water courses present in the excess spoil area. No underdrains are planned for the excess spoil structure.

745.121: Diversions will comply with the requirements of R645-301-742.300

No diversions are planned in the excess spoil area.

745.122 : Underdrains

No underdrains are planned in the excess spoil area.

745.300: Durable Rock Fills

No durable rock fills are planned in the excess spoil area.

745.400: Preexisting Benches

Excess spoil will not be disposed of through placement on preexisting benches.

521.150. Land Surface Configuration Drawings.

Surface contours representing the existing land surface configuration of the proposed permit area are shown on Drawing 5-1 and the post mining land configuration is shown on 5-35. Cross sections with both these landforms are shown on Drawing 5-36.

521.160. Maps and Cross sections of the Proposed Features for the Proposed Permit Area. These maps and cross sections will clearly show:

521.161 Buildings, utility corridors, and facilities to be used:

These items are shown on Drawings 5-3 through 5-8C.

521.162 The area of land to be affected within the proposed permit area, according to the sequence of mining and reclamation:

A yearly and overall disturbance sequence for the permit area is provided on Drawing 5-2 for open pit mining and on Drawing 5-2A for the alternative method of highwall mining.

521.163 Each area of land for which a performance bond or other equivalent guarantee will be posted under R645-301-512;

The area of land that will have a performance bond posted is shown on Drawing 5-3.

521.164 Each coal storage, cleaning and loading area. The map will be prepared and certified according to R645-301-512;

These facilities can be viewed on Drawings 5-3 through 5-5.

521.165 Each topsoil, spoil, coal preparation waste, underground development waste, and noncoal waste storage area. The maps will be prepared and certified according to R645-301-512;

Topsoil storage areas and handling can be viewed on Drawing 2-2. Spoil placement and the excess spoil structure can be viewed on Drawings 5-3, 5-17, 5-18, 5-19, 5-35 and 5-36.

521.166 Each source of waste and each waste disposal area relating to coal processing or pollution control;

Only sizing of the coal is proposed. This process will not produce any waste.

521.167 Each explosive storage and handling facility;

Need for these facilities are not anticipated at this time. Should these facilities become necessary, appropriate drawings will be provided to the Division.

521.168 For the purposes of SURFACE COAL MINING AND RECLAMATION ACTIVITIES, each air pollution collection and control facility; and

There are no specific air pollution collection or control facilities proposed.

521.169 Each proposed coal processing waste bank, dam or embankment. The map will be prepared and certified according to R645-301-512.

The MRP does not contemplate processing of coal that will produce waste.

521.170. Transportation Facilities Drawings.

Transportation facilities for the Coal Hollow Mine include ~~seven~~eight primary roads, a conveyor system, and miscellaneous ancillary/temporary roads. Numerous drawings detail the designs and specifications for each one of the proposed facilities. The following is a description of each facility and a reference for the associated drawings:

- Roads: Two primary mine haul roads are planned within the permit area. The first road extends from the coal unloading area to the first series of pits along the west side of the property. This road will be utilized for access to the pits (pits shown on Drawing 5-10). This road will be approximately 2,800 feet in length and will be utilized throughout mining. There will be three culverts installed along this road all sized for a 100 year, 24 hour storm event. The first culvert will be across a tributary of Lower Robinson Creek and will be a 36 inch corrugated steel pipe. The second culvert is the main crossing over Lower Robinson Creek and is a 96 inch corrugated steel pipe. Both of these culverts have been sized based on analysis of the Lower Robinson Creek watershed. This analysis can be viewed in Appendix A5-3. The third culvert is crossing over a diversion ditch that will route water mainly from disturbed areas along the south side of Lower Robinson Creek to a sediment impoundment. This culvert will be a 24 inch corrugated steel pipe.

  The second road extends from an intersection with the first road, located just south of the Lower Robinson Creek crossing, and proceeds southeast to long term topsoil stockpile 2 and subsoil stockpile pile 1. This road is approximately 1,300 feet in length. There is one culvert crossing along this road to cross a diversion ditch. This culvert will be a 24 inch culvert sized for maximum anticipated flows in the diversion.

  The following specifications apply to these Primary mine haul roads:
  1) Roads will be approximately 80’ in width
  2) Approximately a 2% crown
  3) Approximately one foot deep cut ditches along shoulders for controlling storm water
  4) 18” of crushed rock or gravel for road surfacing
  5) Cut and fill slopes of 1.5 h:1v
  6) Minimum fill over each culvert will be 2 times diameter of culvert
  7) Berms placed as necessary along fills

  The underground mine portal access and haul road in Pit 10 will also be a primary road. This road is accessed from the main haul road from the coal unloading area. The underground access/haul road will be constructed to the same specifications for the haul roads above, except that the road may be narrowed to a 40 foot width.

The ancillary roads will have similar specifications except surfacing will occur only as needed and may be narrowed to a 40 foot road width. A typical cross section for the ancillary roads can be viewed on Drawing 5-24.

The location and details for Primary Mine Haul roads can be viewed on Drawings 5-3 and 5-22 and 5-23.

In addition to the two roads primary Mine Haul roads, the road located within the facilities area is also classified as a primary road. This road is planned to be 24 feet wide with 24 inches of compacted sub base and 8 inches of compacted 1 inch minus gravel as surfacing. This road is referred to as “Facilities Roadway” and more details are described in 527.200 along with Drawings 5-22A and 5-22B.

In addition to the primary roads that will be present during active mining, four additional roads are planned to exist postmining and are also classified as primary roads for this reason.

Roads that will remain postmining are the following:

- Road to Water Well with details shown on Drawing 5-22D
- Road to east C. Burton Pugh property (K3993) with details shown on Drawing 5-22C. Kane County has claimed this road as County Road K3993.
- County Road 136 (K3900) with details on Drawing 5-22E, 5-22F and 5-22H. This County road will be reconstructed within the permit area by Kane County. This reconstruction will occur concurrently with the final phase of reclamation as scheduled on Drawing 5-38 and is expected to be completed by 2017.
- Road to Swapp Ranch (same specification as the Water Well Road)

The location of these roads is shown on Drawings 5-35 and 5-37 along with the post mining topography.

The ramps, benches and equipment travel paths within the active surface mining area are temporary in nature and will be relocated frequently as mining progresses. These temporary travelways are considered part of the pit due to their short term use, and are not individually designed nor engineered. They will be built and maintained to facilitate safe and efficient mine and reclamation operations.

- Conveyors: A conveyor system will be used to stockpile coal and to load highway approved haul trucks for transportation to market. The first conveyor is mainly a stacker system for the coal stockpile which will be located at the coal unloading area and will be approximately 451’ in length. This conveyor is estimated to be a 48” solid frame system.

  The second conveyor is a coal reclaim belt that will be loaded by an above ground reclaim feeder from the coal stockpile and will convey coal to the loadout chute which will load the highway approved coal haulage trucks. This section will be approximately 290' in length. Similar to the first section, this conveyor is estimated to be a 48" solid frame system.

An additional stacking conveyor will be installed to transfer coal from the underground conveyor system to stockpile from which trucks will be loaded. The stacking conveyor will be a 48" wide, wheel-mounted system, approximately 125' in length.

Drawings of ~~this~~these systems can be viewed on Drawings 5-3 through 5-5.

521.180. Support facilities.

Description of the support facilities is provided in Section 526.220. Drawings 5-3, 5-3B, 5-4, 5-5, 5-6, 5-7, 5-8, 5-8A, 5-8B, and 5-8C provide the maps, appropriate cross sections, design drawings and specifications to demonstrate compliance with R645-301-526.220 through R645-301-526.222 for each facility.

521.200. Signs and Markers Specifications.

Signs and markers will be posted, maintained, and removed by Alton Coal Development LLC. Signs and markers will be a uniform design that can be easily seen and read; made of durable material; conform to local laws and regulations, and be maintained during all activities to which they pertain;

521.240. Mine and Permit Identification Signs.

Identification signs showing the name, business address, and telephone number of Alton Coal Development LLC and the identification number of the permanent program permit authorizing coal mining and reclamation operations will be displayed at each point of access to the permit area from public roads, and will be retained and maintained until after the release of all bonds for the permit area;

521.250. Perimeter Markers.

The perimeter of a permit area will be clearly marked before the beginning of surface mining activities;

521.260. Buffer Zone Markers.

Buffer zones will be marked along their boundaries as required under 731.600521.270. Topsoil Markers.

Markers will be erected to mark where topsoil or other vegetation - supporting material is physically segregated and stockpiled.

522. **COAL RECOVERY**.

The MRP is designed to maximize recovery of the coal resource within technological, safety and legal limitations. Coal will be recovered from the Smirl Seam which ranges in thickness from 13.5 to 18.5 feet averaging approximately 16 feet in the planned mining area. The Smirl Seam is the only surface mineable seam in the permit area. Isopach maps of the coal thickness and strip ratio can be viewed on Drawings 5-13 and 5-14

Some coal along the boundaries of the mine area will not be recovered in conjunction with the proposed operation. This includes coal underlying the pit highwalls and areas where drainage or sedimentation control structures (diversions, ditches, ponds, etc) are located. The mine is designed to minimize such losses by locating haulage ramps in the spoil rather than on the pit wall, by oversteepening the coal face at the pit edges, and by minimizing the use of out of pit ancillary roads. Coal which is left in place in these areas may be recovered in the future when adjacent property rights are secured. Current plans are for a planned maximum mining depth of approximately 200 ft. and a strip ratio of 10:1; however, the ultimate mining depth will depend on cost related factors.

A detailed mine plan has been developed for the proposed permit area and the following table along with Drawing 5-9 summarize the coal extraction for the permit area for open pit mining.

~~Description~~	~~Extraction Status~~	~~Average Coal Thickness (ft)~~	~~Average Strip Ratio* (yd^3/Ton)~~	~~Quantity (**Ton)~~
~~Total Coal within Permit Boundary~~	~~N/A~~	~~16.3~~	~~7.7~~	~~12,092,000~~
~~High Strip Ratio Area (NE corner of permit area)~~	~~Not Mined~~	~~16.0~~	~~13.5~~	~~4,268,000~~
~~Coal under highwalls and sedimentation structures~~	~~Not Mined~~	~~17.2~~	~~4.8~~	~~3,011,000~~
~~Coal under Robinson Creek Diversion~~	~~Not Mined~~	~~15.5~~	~~3.9~~	~~172,000~~
~~Recoverable Coal~~	~~Mined~~	~~16.3~~	~~6.4~~	~~4,641,000~~

~~*All strip ratios are bank cubic yards of overburden to tons of coal~~

~~**All coal tons are based on a 95% recovery factor~~

A detailed mine plan has been developed for the proposed permit area and the following table along with Drawing 5-9~~A~~ summarize the coal extraction for the permit area for the ~~alternate option~~open pit mining, highwall mining and underground mining:

Description	Extraction Status	Average Coal Thickness (ft)	Average Strip Ratio* (yd^3/Ton)	Quantity (**Ton)
Total Coal within Permit Boundary	N/A	16.3	7.7	12,092,000
High Strip Ratio Area (NE corner of permit area)	Not Mined	16.0	13.5	~~4,268~~2,930 ,000

Coal under highwalls and sedimentation structures	Not Mined	17.2	4.8	~~900~~2,305,000
Coal under Robinson Creek Diversion	Not Mined	15.5	3.9	~~2,305~~172,000
Highwall & Underground	Not Mined	16.0	0	2,662,000
Recoverable Coal (Surface)	Mined	16.3	6.4	3,~~066~~298,000
Recoverable Coal (Underground)	Mined	16.0	0	725,000

*All strip ratios are bank cubic yards of overburden to tons of coal
**All coal tons are based on a 95% recovery factor for open pit mining and 45% for highwall mining and the underground mining.

Once approval is received to progress with mining on the adjacent federal coal reserves, an additional 57% of the coal under the highwalls will be recovered as part of the progression into these adjacent reserves.

With open pit mining, the application of highly flexible, open pit truck/shovel techniques will minimize losses of coal due to pit geometry or spoil support requirements, allowing the maximum possible exposure of the coal resource. The full seam section will be loaded primarily using large hydraulic backhoes. The backhoes, which can work from the top of the seam, provide the ability to efficiently and cleanly excavate the lower part of the coal seam without disturbing the pit floor. This, along with the machine's high degree of bucket horizon control will minimize floor losses. The backhoes can also work safely from the top of the seam to oversteepen the loading face along the pit walls, thus recovering the maximum amount of coal.

Where pit geometry or operational factors preclude the use of backhoes for loading, a large rubber tire front end loader will be used. These machines provide similar horizon control, can operate on the floor of the pit or on an intermediate bench, and can recover coal from confined areas such as the ends of the pits.

With the ~~alternative option~~highwall miner, the application of a highwall mining system will be employed to recover coal from the exposed face. In this method of mining, an unmanned cutter module is driven underground and operated in front of the highwall. The highwall mining machine stands on the pit floor or on a bench, directly in front of the exposed seam and makes long parallel rectangular drives into the coal seam. A remote-operated cutter module is pushed into the seam by a string of push beams (unmanned coal-conveying elements) that transport the mined coal back to the entry of the drive onto a stockpile.

The underground mining will utilize standard extraction methods. These will include a continuous miner, shuttle cars and a conveyor system to the surface. The mine plan calls for first mining only to prevent subsidence. Coal brought to the surface will flow to a stacking conveyor and stockpile as shown on Drawing 5-3B.

The limited extraction, first-mining only and compliance with the recommendations in the Norwest Report (Appendix 5-9) will ensure access in the event the portals should need to remain open for future underground operations.

Rear dump haul trucks, loaded by the backhoes or front end loader, will be used to move the coal from the pit via inpit roads and the primary haulroad to the crusher and stockpile. The trucks will be equipped with "combo" beds suitable for hauling both coal and overburden, and configured to minimize coal spillage.

A net recovery of 95% (including the effects of in-pit coal losses and out-of-seam dilution) of the coal exposed in the open pit is anticipated. A net recovery of 45% of the coal mined by the ~~alternative~~ highwall system as well as the underground mining is anticipated. Normal coal losses are expected due to cleaning of the top of the seam, loading losses at the seam floor, and coal oxidation near the outcrop.

No coal washing is contemplated at this time, thus there will be no coal processing losses.

Maps and cross sections providing detailed information related to coal recovery activities can be viewed on Drawings 5-9 through 5-14.

523. MINING METHOD(s).

The Coal Hollow Mine will be a ~~surface coal mining operation using open pit mining methods to produce up to 2 million tons of coal per year~~combination coal mining operation, utilizing open pit mining, highwall mining and underground mining methods.~~.~~ Primary mining equipment will include hydraulic excavators, a highwall miner, standard underground mining equipment including a continuous miner, shuttle cars and conveyor system, and end-dump mining trucks. The coal will be crushed at the mine site, and hauled to market in over-the-road coal trucks.

The mine is planned to produce approximately ~~4.64 million tons of coal over a life of approximately 6 years for the preferred option and approximately~~ 3.~~0~~ 5 million tons of coal over a life of approximately ~~5~~ 6 years ~~for the alternate option~~. The estimated production schedule is summarized below ~~for the two options~~:

~~Preferred option~~	~~Alternative option~~Production Schedule

		~~Tons Produced~~
~~Year~~		~~(000)~~
~~1~~		~~542~~
~~2~~		~~505~~
~~3~~		~~750~~
~~4~~		~~1,000~~
~~5~~		~~1,000~~
~~6~~		~~844~~
~~Total~~		~~4,641~~

		Tons Produced
Year		(000)
1		542
2		505
3		568
4		~~598~~685
5		~~816~~762
6		431
Total		3,~~029~~493

Initial mine development will involve removal and storage of topsoil from mine infrastructure locations. Facilities for equipment maintenance/warehouse, coal handling, and offices will be constructed. During the development and initial mining period, facilities temporary in nature may be used until permanent facilities can be built. Construction of sedimentation ponds, diversion ditches, and mine roads accessing the initial mining areas will also be ongoing.

Mining will employ typical open pit methods using truck/loader type equipment to remove overburden and recover the coal. Mining will advance across the property in successive cuts approximately 250 ft. in width and 800 to 1,300 ft. long (generally equal to the width of the property less property barriers). Layout of these pits can be viewed on Drawing 5-10. Drawing 5-10 has been modified from the original layout to accommodate modifications to the plan for highwall mining, underground mining and anomalies encountered in the coal (large sand channels), thus the non-sequential numbering of the pits. The overburden will be removed in layers or lifts approximately 20 to 40 feet deep. In practice, these overburden lifts are mined in a stairstep fashion ahead of the coal removal operation to provide adequate working room for the equipment and stable advancing slopes. Once mining is complete, excavated overburden (spoil) from a successive cut is used to backfill the excavation. General cross sections of this process can be viewed on Drawings 5-11 and 5-12.

Prior to beginning mining, the area will be cleared of vegetation, and the topsoil will be recovered and either stockpiled or live hauled to regraded areas. It is not anticipated that blasting of the overburden will be necessary based on drilling data. Should this process become necessary, this is the phase where it would be implemented. Overburden will then be removed using large hydraulic excavator(s) or front end loaders and off-road trucks which will haul the spoil and place it in parts of the pit where the coal has been removed, or in the excess spoil area shown on Drawings 5-3, 5-35 and 5-36. Overburden is removed in successively deeper benches until the coal seam is exposed. Some overburden in lower lifts may be moved by direct dozing into the mined out pit by large bulldozers.

When overburden removal is finished in a particular pit, the top of the coal will be cleaned (removal of any roof rock or other non-coal material on top of the seam) using a motor grader, dozer or front end loader. The material removed will be placed in the adjacent mined out pit. For the open pit mined coal, if necessary, the coal seam will be loosened by drilling and blasting or ripping prior to loading. Drilling and blasting of the coal is not expected to be necessary. The cleaned, exposed coal is then excavated by backhoe or front end loader and placed into off-road rear dump trucks. Coal mined with a highwall miner would not require blasting.

Once the coal is removed, the pit will be backfilled by spoil from adjacent mine pits. Spoil will be placed in lifts and spread with a dozer. Once the pit is backfilled to the planned final surface contour, suitable topsoil and subsoil will be replaced, and the area reseeded. Revegetation work will proceed seasonally as appropriate for planting.

Overburden excavation and coal mining at Coal Hollow will begin near the subcrop of the coal seam at the western end of the permit area in the NW ¼ NE ¼ of Section 30, T39S, R5W. Topsoil will be removed and stored separately in topsoil stockpiles as shown on Map 2-2. Overburden from the initial pits will be hauled to the excess spoil pile east of the mining area. Once the initial pits are established, as much spoil as possible will be placed directly in the pit backfill, allowing reclamation to closely follow mining. This initial phase includes pits 1 through ~~8~~ 9 as shown on Drawing 5-10. ~~The mining and reclamation process for this phase can be viewed on Drawing 5-17.~~

From the initial mining area, operations will proceed ~~eastward through the NE ¼ of Section 30 to the NW ¼ of Section 29 (as shown on Drawing 5-10) and~~ from the southeast ¼ of Section 30, beginning with pit 28 and proceeding north to pit 22 . ~~The mining and reclamation process for this phase can be viewed on Drawing 5-18. As shown on Drawing 5-19, p~~Pit 9 will not be backfilled at this stage; it has been left open for placement of the highwall miner to recover coal from panels 1-3. In hole 27 of Pit 9 Panel 3, the highwall miner head became lodged. Another head was leased in order to continue highwall mining in pits 22 and 23 while a recover plan was approved to mine Pit 10 and recover the lodged miner head. Pit 21 was then mined along the highwall panels in 21, then Pit10. Pit 10 will remain open for development of the underground portals and remain open until all underground coal is mined. Surface mining will continue with mining of Highwall Trench (HWT) 1 continuing south to HWT 3.The proposed method for filling this pit back to approximate original contour will be accomplished by utilizing overburden from the pit(s) in the adjacent federal reserves located ~~immediately southwest or north of this area~~east of Pit 6. Alton Coal Development, LLC is currently in the process of an Environmental Impact Study for these reserves with the intent of acquiring the rights to mine. It is expected that these rights will be acquired prior to the completion of the final phase in the proposed Permit Area. Also, if acquired, Pit 10 along with the underground portals will remain open to access underground coal within the LBA. The final landform for the Permit Area is shown on Drawings 5-35 and 5-36.

In the case that Alton Coal Development, LLC is not successful with acquiring the rights to the adjacent federal coal reserves, spoil will be rehandled from the excess spoil and variance from the approximate original contour to fill the remaining pits. The final landform for this alternate scenario is shown on Drawing 5-37 and 5-37A.

An estimate of the primary mining equipment planned for use at the Coal Hollow Mine is listed below:

Diesel - Hydraulic Excavators (15 to 38 cu. yd. capacity)
Highwall Mining System (CAT HW300 or equivalent)
Rubber Tired Front End Loaders (8 to 20 cu. yd. capacity)
End Dump Trucks (100 to 240 ton capacity class)
Track Dozers (Caterpillar D7 through D11 Class)
Motor Graders (Caterpillar 16H to 24H Class)
Water Trucks (8,000 to 20,000 Gallon Class)
Underground miner and associated equipment

A variety of other equipment will also be used to support the mining operation.

Proposed engineering techniques for meeting the proposed mining methods will include:

- Design support for roads, pits, sediment impoundments etc…
- Field staking of designs utilizing high precision GPS survey systems.
- Weekly field engineering support to view and provide guidance related to designs and environmental controls.
- Ongoing geotechnical support for ensuring highwall stability
- As additional information becomes available, update geological models to ensure full recovery of resource.
- Weekly mine plans that specify appropriate engineering and environmental specifications.

There are no known underground mines within 500 feet of the permit boundary~~;~~. ~~therefore, n~~No surface mining or reclamation activities ~~will~~ are proposed to take place within 500 feet of ~~any~~ the underground mine.

524. BLASTING AND EXPLOSIVES

As a result of the 2005 drilling program and overburden characterization, it was determined that the soil over the coal seam is void of any solid structure and that the overburden is extremely homogenous consisting of soft clay and soft shale. As results of this cursory investigation, it is anticipated that there would be no need to drill and blast the overburden to facilitate the removal of the spoil above the coal seam. Also, due to the fact that the coal will have to be mined from on top of the seam due to wet clay zone beneath the coal seam it is anticipated that there would be no need to drill and blast the coal seam to facilitate coal removal.

As a safeguard or fallback position if mining condition should change, all blasting and explosive criteria will be addressed.

Though not anticipated, explosives may be utilized as necessary at Coal Hollow Mine to break the overburden over the coal and may be used to break the coal for loading if necessary. In accordance with the requirements of this section, a blasting plan is provided to the Division in Appendix 5-4. Blasts that use more than five pounds of explosives or blasting agents will be conducted according to the schedule provided in 524.400.

524.100 Blaster Certification

Alton Coal Development, LLC (ACD) will, prior to conducting any surface blasting operations, ensure that all surface blasting incident to surface mining in Utah is conducted under the direction of a Utah Certified Blaster. Certificates of blaster certification will be carried by the blasters or will be on file at the mine permit area during blasting operations. A blaster and at least one other person will be present at the firing of a blast.

Persons responsible for blasting operations at a blasting site will be familiar with the blasting plan and site-specific performance standards and give on-the-job training to persons who are not certified and who are assigned to the blasting crew or assist in the use of explosives.

524.200 Blast Design

There are no dwellings, public buildings, schools, churches, or community or institutional building within 1,000 feet of the planned blasting area in the initial (year 1) mining period. There are also no underground mines within 500 feet of the permit. The anticipated blast design can not be reasonably estimated at this time since ACD is not sure what geologic conditions exist that may require blasting. If conditions are encountered that require blasting, ACD will provide the Division with the designed pattern prior to conducting blasting.

Blasts conducted within 1000 ft. of a dwelling, public building, school, church, or community or institutional building will be submitted for Division and MSHA approval, prior to blasting. The blast design will contain sketches of the drill and delay patterns, decking, type and amount of explosives required per blast, critical dimensions, design factors utilized to protect the public, general location drawings of protected structures, which meet the applicable airblast, flyrock, and ground vibration standards in 524.600.

The blast design will be prepared and signed by a Utah certified blaster.

524.300 - 350 Preblasting Survey

A preblasting survey will be conducted prior to commencement of blasting operations. As part of the preblasting survey Alton Coal Development LLC will:

- Notify, in writing, all residents or owners of dwellings or other structures located within one-half mile of the permit area how to request a preblasting survey at least 30 days before initiation of blasting.
- Prepare a written report of any preblasting survey. A resident or owner of a dwelling or structure within one-half mile of any part of the permit area may

request a preblasting survey. This request will be made, in writing, directly to Alton Coal Development LLC or to the Division, who will promptly notify Alton Coal Development LLC. Alton Coal Development LLC will promptly conduct a preblasting survey of the dwelling or structure and promptly prepare the written report. An updated survey of any additions, modifications, or renovation will be performed by Alton Coal Development LLC if requested by the resident or owner.

- Determine the condition of the dwelling or structure and will document any preblasting damage and other physical factors that could reasonably be affected by the blasting. Structures such as pipelines, cables, transmission lines, and cisterns, wells, and other water systems warrant special attention; however, the assessment of these structures may be limited to surface conditions and other readily available data.
- Require the written report of the survey be signed by the person who conducted the survey. Copies of the report will be promptly provided to the Division and to the person requesting the survey. If the person requesting the survey disagrees with the contents and/or recommendations contained therein, he or she may submit to both Alton Coal Development LLC and the Division a detailed description of the specific areas of disagreement.
- Complete any survey requested more than ten days before the planned initiation of blasting, before blasting occurs.

524.400 Blasting Schedule

524.410. Unscheduled Blasts

Unscheduled blasts will be conducted only where public or operator health and safety so requires and for emergency blasting actions. When an unscheduled surface blast incidental to coal mining and reclamation operations is conducted, Alton Coal Development LLC, using audible signals, will notify residents within one-half mile of the blasting site and document the reason in accordance with 524.760.

524.420. Timing of Blasting

All blasting will be conducted between sunrise and sunset unless nighttime blasting is approved by the Division. Alton Coal Development LLC will conduct blasting operations at times approved by the Division and announced in the blasting schedule.

524.450 - 453. Blasting Schedule Publication and Distribution.

Alton Coal Development, LLC will:

- Publish the blasting schedule in a newspaper of general circulation in the locality of the blasting site at least ten days, but not more than 30 days, before beginning a blasting program;
- Distribute copies of the schedule to local governments and public utilities and to each local residence within one-half mile of the proposed blasting site described in the schedule; and
- Republish and redistribute the schedule at least every 12 months and revise and republish the schedule at least ten days, but not more than 30 days, before blasting whenever the area covered by the schedule changes or actual time periods for blasting significantly differ from the prior announcement; and

524.460 - 465. Blasting Schedule Contents.

The blasting schedule will contain, at a minimum:

- Name, address, and telephone number of operator;
- Identification of the specific areas in which blasting will take place;
- Dates and time periods when explosives are to be detonated;
- Methods to be used to control access to the blasting area; and
- Type and patterns of audible warning and all-clear signals to be used before and after blasting.

524.500 - 532 Blasting and Warning Signs, Access Control

Blasting signs will read **"Blasting Area"** and be conspicuously placed along the edge of any blasting area that comes within 100 feet of any public right-of-way, and at the point where any other road provides access to the blasting area. At all entrances to the mine permit area from public roads or highways, signs will be conspicuously placed which read **"Warning! Explosives in Use"**, clearly list and describe the meaning of the audible blast warning and all-clear signals in use, and explain the identification of blasting areas where charged holes await firing at the blasting site in the mine permit area.

Warning and all-clear signals of different character or pattern that are audible within a range of one-half mile from the point of the blast will be given. Each person within the permit area and each person who resides or works regularly within one-half mile of the blast site in the mine permit area will be notified of the meaning of the signals in the blasting schedule and notification.

Access within the blasting areas will be controlled to prevent presence of livestock or unauthorized persons during blasting and until an authorized representative of Alton Coal Development LLC has reasonably determined that no unusual hazards exist, such as imminent slides or un-detonated charges; and access to and travel within the blasting area can be safely resumed.

524.600 - 610 Adverse Effects Of Blasting

Blasting will be conducted to prevent injury to persons, damage to public or private property outside the mine permit area, and changes in the course, channels, or availability of surface or ground water outside the mine permit area.

524.620 Airblast Limits

Airblast will not exceed the maximum limits listed below at the location of any dwelling, public building, school, church, or community or institutional building outside the mine permit area, except for those structures and facilities owned by Alton Coal Development LLC as approved by the Division. Maximum airblast limits are as follows:

Lower Frequency Limit of Measuring System, HZ (+3dB)		Maximum Level dB
0.1 Hz or lower – flat response (1)		134 peak
2 Hz or lower – flat response		133 peak
6 Hz or lower – flat response		129 peak
C-weighed – slow response (1)		105 peak dBC

(1) Only when approved by the Division.

524.630. Monitoring:

Periodic monitoring will be conducted to ensure compliance with the airblast standards. Airblast measurements and will be taken as required by the Division at locations specified by the Division. The measuring system used will have an upper-end flat frequency response of at least 200 Hz.

524.633. Flyrock:

Flyrock traveling in the air or along the ground will not be cast from the blasting site more than one-half the distance to the nearest dwelling or other occupied structure; beyond the area of blasting access control or beyond the mine permit area boundary.

524.640 - 662. Ground Vibration.

In all blasting operations, except as otherwise authorized by the Division, the maximum ground vibration will not exceed the values approved by the Division. The maximum ground vibration for protected structures will be in accordance with either the maximum peak-particle velocity limits, the scaled-distance equation, the blasting-level chart, or by the Division. All other structures in the vicinity of the blasting area such as water towers, pipelines and other utilities, tunnels, dams, impoundments, and underground mines will be protected from damage by establishment of a maximum allowable limit on the ground vibration. These limits will be submitted by Alton Coal Development LLC and approved by the Division prior to blasting. A seismographic record will be provided for each blast. **Maximum Peak-Particle Velocity Method:** The maximum ground vibration will not exceed the following limits at the location of any dwelling, public building, school, church, or community or institutional building outside the mine permit area in accordance with the following:

Distance (D) from Blast Site in feet	Maximum allowable Particle Velocity (Vmax) for ground vibration, in inches/second (1)	Scaled distance factor to be applied without seismic monitoring (Ds) (2)
0 to 300	1.25	50
301 to 5,000	1.00	55
5,001 and beyond	0.75	65

(1) Ground vibration will be measured as the particle velocity. Particle velocity will be recorded in three mutually perpendicular directions. The maximum allowable peak particle velocity will apply to each of the three measurements.
(2) Applicable in the scale-distance equation of 524.651.

Scaled Distance Equation Method: Alton Coal Development LLC will use the scaled-distance equation, $W=(D/Ds)^2$, to determine the allowable charge weight of explosives to be detonated in any eight-millisecond period, without seismic monitoring: where W = the maximum weight of explosives, in pounds: D = the distance, in feet, from the blasting site to the nearest protected structure: and Ds = the scaled-distance factor, which may initially be approved by the Division using the values for scaled-distance factor listed in 524.642.

The development of a modified scaled-distance factor may be authorized by the Division on receipt of a written request by Alton Coal Development LLC, supported by seismographic records of blasting at the mine site. The modified scaled-distance factor of the predicted ground vibration will not exceed the prescribed maximum allowable peak particle velocity of 524.642 at a 95% confidence level.

Blasting-Level-Chart. Alton Coal Development LLC may use the ground-vibration limits in Figure 1 (Figure 1, showing maximum allowable ground particle velocity at specified frequencies, is incorporated by reference. Figure 1 may be viewed at 30 CFR 817.67 or at the Division of Oil, Gas and Mining State Office.) to determine the maximum allowable ground vibration. If the Figure 1 limits are used, a seismographic record including both particle velocity and vibration-frequency levels will be provided for each blast. The method for the analysis of the predominant frequency contained in the blasting records will be approved by the Division before application of this alternative blasting criterion.

524.690. Standards not Applicable

The maximum airblast and ground-vibration standards of 524.620 through 524.632 and 524.640 through 524.680 will not apply at the following locations: At structures owned by Alton Coal Development LLC and not leased to another person; and at structures owned by Alton Coal Development LLC and leased to another person, if a written waiver by the lessee is submitted to the Division before blasting.

524.700 Records of Blasting Operations**:**

Blasting records will be maintained at the mine site for at least three years and upon request, records will be available for inspection by the Division or the public. A blasting record will contain the name of Alton Coal Development LLC; location, date, and time of the blast; name, signature, and Utah certification number of the blaster conducting the blast. It will also include the identification, direction, and distance, in feet, from the nearest blast hole to the nearest dwelling, public building, school, church, community or institutional building outside the permit area, except those described in 524.690 and weather conditions, including those which may cause possible adverse blasting effects.

The blasting record will include: The type of material blasted; sketches of the blast pattern including number of holes, burden, spacing, decks, and delay pattern; diameter and depth of holes; types of explosives used; total weight of explosives detonated in an eight-millisecond period; initiation system; type and length of stemming; and mats or other protection used.

If required, a record of seismographic and airblast information will include: type of instrument, sensitivity, and calibration signal or certification of annual calibration; exact location of instrument and the date, time, and distance from the blast; name of the person and firm analyzing the seismographic record; and the vibration and/or airblast level recorded; and the reasons and conditions for each unscheduled blast.

524.800 Use of Explosives:

Alton Coal Development LLC will comply with all appropriate Utah and federal laws and regulations in the use of explosives.

525. SUBSIDENCE CONTROL PLAN

The proposed underground mining is first-mining only and is planned for ~~has~~ limited extraction with no subsidence. Refer to Appendix 5-9 (Norwest Report) for geotechnical and design information. D~~o~~ue to the design and mining method of underground mining in this plan, no subsidence is projected and no monitoring is planned. As requested by the Division, however, the company will conduct surface observation walkovers of each of the 4 developed panel areas in this proposed plan within 60 days of completion of mining in those areas. If the observations determine that no affects or voids have developed to the surface, it will be documented and forwarded to the Division. If surface cracking, sinkholes or other surface impacts are noted during the walkovers, they will be documented, located on a surface topographic map, reported to the Division, photographed and repaired after approval by the Division. If the observation indicates no deformation is occurring, no further walkovers are proposed to be conducted on the respective panel areas.

It should be noted that, in addition to the larger pillar sizing near the portals (Appendix 5-9), the portal entries will be lined with arches and/or crossbars in areas of less than 120' of cover, per recommendations in the Norwest Report (Appendix 5-9), to further reduce the possibility of subsidence or failure in that low cover area.

Highwall mining or Auger mining, as defined in the definitions in R645-100-200 is Surface Mining, thus Underground regulations do not apply. Therefore, highwall mining in this plan have been addressed using the regulations contained in R645-302-240, Special Categories of Mining. The alternate highwall option has limited extraction with no subsidence. Refer to Appendix 5-8 (Feasibility of highwall mining the Smirl seam) for geotechnical and design information. Do to the design and mining method of highwall mining in this plan, no subsidence is projected and no monitoring is planned. Appendix 1-2 Right of Entry, Exhibit 5 contains the New Dame Lease. In this document, under Article 7 Section 7.03, provisions have been made if there is material damage as a result of subsidence.

526. **MINE FACILITIES**:

526.110-115 Existing Structures.

There are no existing structures within the permit area.

526.116. Public Roads:

526.116.1. Operations Within 100 ft. of a Public Road

Initial mining operations at the Coal Hollow Mine will be on the western edge of the property, and will require rerouting Kane County Road #136 (K3900) so that operations do not come within 100 feet of this road. During the initial development phase (topsoil removal, diversion construction, etc.), equipment traffic may cross the county road right-of-way to access the necessary area. see Drawing 5-3. Details related to the road relocation and reestablishment can be viewed on Drawings 5-3, 5-22E, 5-22F, 5-22H and in Appendix 1-7.

In addition, the road adjacent to Lower Robinson Creek (K3993) has been claimed by Kane County as a public road. An agreement has been developed with the County to restrict access on this road to escort by mine personnel only. Details for the reestablishment of this road following mining are provided on Drawing 5-22C.

526.116.2 Relocating a Public Road:

Following the initial development period, Kane County will temporarily relocate County Road #136 (K3900) to federal lands located west of the permit area which are managed by the BLM. This relocation will bypass the permit area for the duration of mining operations and is shown on Drawing 5-3. Details of agreements and appropriate approvals for this road relocation are located in Appendix 1-7. The relocated road is not within 100 ft. of mining or reclamation operations. The design and route of the relocated road has been approved by Kane County authorities and the BLM. Kane County will continue to have sole jurisdiction and will maintain it as a public road. Following completion of mining operations within the permit area, Kane County will reestablish the road to the approximate original location and will also reclaim the temporary road as required by the BLM. The existing road from the north relocation diversion point to the permit boundary will also continue to be maintained as a public road by Kane County. Once the road intersects the permit boundary, appropriate signs and barricades will be installed to protect the public. This road will be reestablished following mining as provided in the agreements in Appendix 1-7 and shown on Drawings 5-22E, 5-22F and 5-22H.

526.200 Utility Installation and Support Facilities

526.210 Existing Utilities.

There are no known oil, gas, and water wells; oil, gas, and coal-slurry pipelines, railroads; electric and telephone lines; and water and sewage lines passing over, under, or through the permit area. Should such facilities be installed, mining and reclamation operations will be conducted in a manner that minimizes damage, destruction, or disruption of services provided by such facilities unless otherwise approved by the owner of those facilities and the Division.

526.220 Support Facilities

The primary mine support facilities will include an office, shop, wash bay, oil containment, fuel containment, coal stacking system, coal loadout system and an equipment parking area These facilities will be constructed on an isolated section of the permit area that is approximately 34 acres. This area is located immediately north of Lower Robinson Creek, in Township 39 South, Range 5 West, Section 19. A diversion ditch will route water from the upgradient area immediately east of the area around the facilities and into a tributary of Lower Robinson Creek as shown on Drawing 5-3. Storm water and snow melt that occurs within the facilities area will be routed to an impoundment that will contain sediment. This impoundment will have a drop-pipe spillway installed that will allow removal of any oil sheens that may result from parking lots or maintenance activities by using absorbent materials to remove the sheen. In addition to this pond, an additional small impoundment will also be located in the southwest corner of the facilities area to control drainage from the mine access road. Details for these impoundments can be viewed on Drawings 5-28 and 5-28B.

The following is a detailed description of each proposed facility and a reference to where detailed drawings can be found:

- Office: The office will be located on the northwest corner of the facilities area, immediately adjacent to the facilities access road. This building will be a steel structure with concrete footers. This structure will be 150 feet long by 100 feet wide and will be two stories in height. The office will provide working space for administrative and technical personnel. Details for the office can be viewed of Drawings 5-3 and 5-6.
- Shop: The shop will be located on the northeast side of the facilities area. This building will be a steel structure with concrete floors and foundation. The structure will be approximately 200 feet long by 100 feet wide and 50 feet high. This building will be used for maintenance of equipment, parts storage, tool storage, and office space for maintenance personnel. Details for this building can be viewed on Drawings 5-3 and 5-7.
- Wash Bay: The wash bay will be located immediately east of the shop. This building will be a steel structure with a concrete foundation. The structure will be 50 feet long by 60 feet wide and 50 feet high. Included will be a closed circuit water recycle system. This system will eliminate and store water impurities and reroute water back through the wash bay for cleaning equipment. Details for this structure can be viewed on Drawings 5-3, 5-8, and 5-8A.
- Oil and Fuel Containments: The oil and fuel containments will be concrete structures appropriately sized for containing metal tanks. The oil containment will contain 55 gallon barrels and up to 2,000 gallon totes. This containment will be 80 feet long by 30 feet wide and 3 feet deep. The fuel containment will store 3 fuel tanks. Included will be a 4,000 gallon unleaded fuel tank and two 12,000 gallon diesel tanks. This structure will 50 feet long by 30 feet wide and 3 feet deep. Details for this structure can be viewed on Drawings 5-3 and 5-8.
- Coal Stacking System: The coal stacking system will be located in the central part of the facilities area. This system will include a coal hopper, coal feeder breaker, feed conveyor, crusher, and an inclined conveyor belt. Trucks will dump coal into the coal hopper which will funnel coal through the feeder breaker onto a short feed conveyor belt. This conveyor belt will transport the coal approximately 195 feet to a crusher that will size the coal appropriately for market. Once the coal is sized through the crusher it will enter an inclined stacker conveyor belt that is angled at approximately 16 degrees and is 186 feet long. This system will be a radial conveyor which will feed a coal stock pile with a live storage of approximately 50,000 tons. This system can be viewed on Drawings 5-3 through 5-5.
- Coal Loadout System: The coal loadout system will be located in the central part of the facilities area. This system will include an above ground reclaim feeder, a coal reclaim conveyor and an inclined conveyor. The reclaim feeder will be loaded by a dozer pushing the coal onto the feeder. One inclined conveyor that is approximately 290 feet in length will convey the coal from the feeder to the loadout hopper. This loadout hopper will load highway approved haul trucks that transport coal to market.
- Minor Facilities: The minor facilities will include a septic vault at the office (Drawing 5-6), a power washing and water recycle system in the Wash Bay (Drawing 5-8A),

conduit with electrical lines running from generators to various facilities (Drawing 5-8B), Water System (Drawing 5-8C), an Equipment Hotstart Area (Drawing 5-3, 5-8B) and a Field Hydrant (Drawing 5-4, 5-5, 5-8B).

- Electrical System: The electrical system for the facilities at Coal Hollow will consist of two diesel fuel powered generators. One generator is a 750 KVA unit that will provide electricity to all the buildings. The other generator is a 1200 KVA unit that will be used to supply electricity to the coal conveying, sizing, stockpiling and loading system. The anticipated layout of the electrical system is shown on Drawing 5-8B.
- Dust Control Structures: A water system will be constructed to provide water for non-potable uses at the facilities and also for fugitive dust control measures. This system will consist of a water well, 6" water transport pipe, and two 16,000 gallon water tanks. The first water tank will be placed near the mining area and will be used specifically to load the water truck which will spray water on the active roads within the permit area to control dust. The second tank is located at the facilities area to provide a water supply to the facilities for non-potable uses (cleaning equipment, restrooms, etc…). Further details related to this water system can be viewed on Drawing 5-8C.
- Underground Mining Facilities: Mine fan, portable generator/power supply, water supply system~~,~~ and stacking conveyor. The generator and stacker are mobile and considered temporary. The mine fan is a single unit that is mounted, but easily removed. All of these facilities are in an existing pit, and shown on Drawing 5-3B.

During mine development and the initial mining period, some facilities of a temporary nature such as mobile buildings and crusher/stacking conveyors may be utilized.

Support facilities to provide lighting at night will be kept to a minimum but will need to be sufficient enough to provide safe operating conditions in the dark. The following lighting equipment is anticipated to be used to provide safe working conditions:

- Two to three mobile light plants: Each light plant will have up to four 1,000 watt lights.
- Four to six exterior lights at the facilities area for lighting walkways and miscellaneous work areas: Each of these is expected to be 250 watt lights.
- Lights on mobile mining equipment, support vehicles and building lights

The support facilities will be located, maintained, and used in a manner that prevent or control erosion and siltation, water pollution, and damage to public or private property; and to the extent possible use the best technology currently available to minimize damage to fish, wildlife, and related environmental values; and minimize additional contributions of suspended solids to stream flow or runoff outside the mine permit area. Any such contributions will not be in excess of limitations of Utah or Federal law.

The facilities will be fully reclaimed at the end of mining operations with the exception of the water well. The final contour for this area can be viewed on Drawing 5-35 and 5-37 and an anticipated timetable is shown on Drawing 5-38.

526.300 Water Pollution Control Facilities:

Water pollution associated with mining and reclamation activities within the permit areas will be controlled by:

- Construction of berms and/or diversion ditches to control runoff from all facilities areas.
- Roads will be constructed with ditches to capture runoff
- Diversion ditches will be constructed as necessary around active mining and reclamation areas to capture runoff from those areas.
- Sedimentation impoundments will be constructed to control discharges
- In areas where impoundments or diversions are not suitable to the surrounding terrain, silt fence or other appropriate structures will be utilized to control sediment discharge from the permit area.

In order to accomplish these objectives, watershed analysis of the permit and adjacent areas has been completed and specific designs are established for each water pollution control structure. Primary control structures include five sediment impoundments, four diversion ditches and miscellaneous berms. The locations of these structures can be viewed on Drawing 5-3. The detailed analysis for these structures and specific designs can be viewed on Drawings 5-25 through 5-34. In addition, a geotechnical analysis of the impoundments to ensure stability can be viewed in Appendix 5-1. The watershed and structure sizing analysis can be viewed in Appendix 5-2.

In addition to these primary structures, temporary diversions and impoundments may also be implemented, as necessary, in mining areas to further enhance pollution controls.

All these facilities will be reclaimed to approximate original contour. The reclamation sequence and final landform can be viewed on Drawings 5-35 and 5-38.

526.400 Air Pollution Control Facilities:

Air pollution (fugitive dust) emissions from mining and reclamation operations in the permit area will be controlled by a number of means, including:

- Haul roads will be maintained and will have water or other dust suppressants applied as appropriate.
- Road surfaces will be graded to stabilize/remove dust-forming debris as required.
- Areas adjoining primary roads will be stabilized and vegetated as required.
- Mobile equipment speeds will be controlled to minimize dusting conditions.
- Cleared vegetation debris within the mine area will be disposed of by placement in pit backfills.

A water system will be constructed to provide water for non-potable uses at the facilities and also for fugitive dust control measures. This system will consist of a water well, 6" water transport pipe, and two 16,000 gallon water tanks. The first water tank will be placed near the mining area and will be used specifically to load the water truck which will spray water on the active roads within the permit area to control dust. The second tank is located at the facilities area to provide a water supply to the facilities for non-potable uses (cleaning equipment, restrooms, etc…). Further details related to this water system can be viewed on Drawing 5-8C.

For details related to air pollution control and monitoring, refer to Chapter 4 and Appendix 4-2 and 4-5.

527. **TRANSPORTATION FACILITIES**

527.100 Classification of Roads

Primary roads are any road that is used to transport coal or spoil and is frequently used for access or other purposes for a period in excess of six months; or is to be retained for an approved postmining land use. The following ~~is~~are the roads that meet the classification of a primary road based on this standard:

Roads used to transport coal or spoil in excess of six months

There are ~~two~~three roads that will be used to transport coal or spoil in excess of six months and are referred to as "Year 1 and 2 Mine Haul Road" and "Year 2 and 3 Mine Haul Road", and the Underground Portal Access/Haul Road. The~~se~~ two main haul roads will be the main accesses for the pits throughout the life of the mine. Details for these ~~two~~ roads are provided in Section 527.200 and on Drawings 5-22 and 5-23. In addition to these ~~two~~ roads, the road located within the facilities area is also classified as a primary road. This road is referred to as "Facilities Roadway" and details are described in 527.200 along with Drawings 5-22A and 5-22B.

Roads retained for an approved postmining land use

Roads retained for an approved postmining land use include the following: Access to East Pugh Property (K3993), County Road 136 (K3900), Access to Water Well and Road to Swapp Ranch. Details and locations for these roads are shown on Drawings 5-35, 5-37, 5-22A, 5-22B, 5-22C, 5-22D, 5-22E, 5-22F and 5-22H.

All other roads planned for construction within the permit area will be classified as ancillary. These will include temporary ramps, benches and equipment travel paths within the active mining area.

527.200 Description of Roads

~~Roads~~Transportation facilities for the Coal Hollow Mine include ~~seven~~eight primary roads, 2 stacking conveyors, a conveyor system, and miscellaneous ancillary/temporary roads. Numerous drawings detail the designs and specifications for each one of the proposed facilities. The following is a description of each facility and a reference for the associated drawings:

- Roads: Two primary mine haul roads are planned within the permit area. The first road extends from the coal unloading area to the first series of pits along the west side of the property. This road will be utilized for access to the pits (pits shown on Drawing 5-10). This road will be approximately 2,800 feet in length and will be utilized throughout mining. There will be three culverts installed along this road all sized for a 100 year, 24 hour storm event. The first culvert will be across a tributary of Lower Robinson Creek and will be a 36 inch corrugated steel pipe. The second culvert is the main crossing over Lower Robinson Creek and is a 96 inch corrugated steel pipe. Both of these culverts have been sized based on analysis of the Lower Robinson Creek watershed. This analysis can be viewed in Appendix A5-3. The third culvert is crossing over a diversion ditch that will route water mainly from disturbed areas along the south side of Lower Robinson Creek to a sediment impoundment. This culvert will be a 24 inch corrugated steel pipe.

  The second road extends from an intersection with the first road, located just south of the Lower Robinson Creek crossing, and proceeds southeast to long term topsoil stockpile 2 and subsoil stockpile 1. This road is approximately 1,300 feet in length. There is one culvert crossing along this road to cross a diversion ditch. This culvert will be a 24 inch culvert sized for maximum anticipated flows in the diversion.

  The following specifications apply to these Primary mine haul roads:
    1) Roads will be approximately 80' in width
    2) Approximately a 2% crown
    3) Approximately one foot deep cut ditches along shoulders for controlling storm water
    4) 18" of crushed rock or gravel for road surfacing
    5) Cut and fill slopes of 1.5 h:1v
    6) Minimum fill over each culvert will be 2 times diameter of culvert
    7) Berms placed as necessary along fills

  The underground mine portal access and haul road in Pit 10 will also be a primary road. This road is accessed from the main haul road from the coal unloading area. The underground access road will be approximately 500' in length and will be constructed to the same specifications for the haul roads above, except that the road may be narrowed to a 40 foot width.

The ancillary roads will have similar specifications except surfacing will occur only as needed and may be narrowed to a 40 foot road width. A typical cross section for the ancillary roads can be viewed on Drawing 5-24.

The location and details for Primary Mine Haul roads can be viewed on Drawings 5-3 and 5-22 and 5-23.

In addition to the two roads primary Mine Haul roads, the road located within the facilities area is also classified as a primary road. This road is planned to be 24 feet wide with 24 inches of compacted sub base and 8 inches of compacted 1 inch minus gravel as surfacing. This road is referred to as "Facilities Roadway" and more details are described in 527.200 along with Drawings 5-22A and 5-22B.

In addition to the primary roads that will be present during active mining, four additional roads are planned to exist postmining and are also classified as primary roads for this reason.

Roads that will remain postmining are the following:

- Road to Water Well with details shown on Drawing 5-22D
- Road to east C. Burton Pugh property (K3993) with details shown on Drawing 5-22C
- County Road 136 (K3900) with details on Drawing 5-22E, 5-22F and 5-22G. This County road will be reconstructed within the permit area by Kane County. This reconstruction will occur concurrently with the final stage of reclamation as scheduled on Drawing 5-38 and is expected to be completed by the end of Year 4.
- Road to Swapp Ranch (same specification as the Water Well Road)

The location of these roads is shown on Drawings 5-35 and 5-37 along with the post mining topography.

The ramps, benches and equipment travel paths within the active surface mining area are temporary in nature and will be relocated frequently as mining progresses. These temporary travelways are considered part of the pit due to their short term use, and are not individually designed nor engineered. They will be built and maintained to facilitate safe and efficient mine and reclamation operations.

- Conveyors: A conveyor system will be used to stockpile coal and to load highway approved haul trucks for transportation to market. The first conveyor is mainly a stacker system for the coal stockpile which will be located at the coal unloading area and will be approximately 451' in length. This conveyor is estimated to be a 48" solid frame system.

  The second conveyor is a coal reclaim belt that will be loaded by an above ground reclaim feeder from the coal stockpile and will convey coal to the loadout chute which will load the highway approved coal haulage trucks. This section will be approximately 290’ in length. Similar to the first section, this conveyor is estimated to be a 48” solid frame system.

An additional stacking conveyor will be installed to transfer coal from the underground conveyor system to a stockpile from which trucks will be loaded. The stacking conveyor will be a 48’wide, wheel-mounted system, approximately 250’ in length.

Drawings of ~~this~~these systems can be viewed on Drawings 5-3 through 5-5.

527.220 Alteration or Relocation of Natural Drainageways.

As currently planned, no natural drainageways will be altered or relocated due to road construction, though a temporary diversion of Lower Robinson Creek will be constructed to allow for maximum recovery of coal. This temporary diversion of Lower Robinson Creek is not being constructed to facilitate road construction. If any other alterations or relocations are necessary, appropriate measures will be taken to obtain Division approval for such alterations or relocations.

Mine development work will include a temporary diversion of Lower Robinson Creek away from the mining area. This diversion has been designed for a flow capacity of a 100 year, 24 hour storm event. The sides will be graded to a 3h:1v slope and rip-rap will be appropriately placed to minimize erosion of the channel beyond current channel conditions. All specifications required to meet the requirements for such a diversion have been included in this diversion design. Appendix 5-2 details the analysis/specifications for this diversion and Drawings 5-20 and 5-21 show the details of this design.

As part of the reclamation process, Lower Robinson Creek will be reconstructed to its approximate original location. The design for this reconstruction is shown on Drawings 5-20A and 5-21A. This design includes considerable improvements to the channel compared to the channel’s current condition. The current condition is such that less than 25% of the channel within the disturbed area has a flood plain present and most of the slopes are near the angle of repose with fair to poor vegetative cover. The reconstructed channel includes stable slope angles that will be revegetated with a flood plain on both sides of the channel for the entire length reconstructed. Sharp corners in the original alignment have been rounded to sinuous curve shapes and rip-rap will be installed in the bottom section of the channel to minimize erosion. The flood plain will seeded and covered with erosion matting to control erosion until a natural vegetative condition can be attained.

527.230 Road Maintenance

All roads will be maintained on an as needed basis using motor graders, water trucks for dust suppression, and other equipment as necessary. Crushed stone and/or gravel will be used as a surface course for primary roads outside the active mining area, and may be used as needed for ramps and travelways within the pit. Should the roads be damaged by a catastrophic event, such as an earthquake or a flood, repairs will be made as soon as possible after the damage has occurred or the road will be closed and reclaimed.

527.250. Geotechnical Analysis

No alternative specifications or steep cut slopes associated with roads are anticipated outside the active mine area. A report of appropriate geotechnical analysis will be provided should such alternative specifications or steep cut slopes where approval of the Division is required, become necessary.

528. HANDLING AND DISPOSAL OF COAL, OVERBURDEN, EXCESS SPOIL, AND COAL MINE WASTE:

528.100. Coal removal, handling, storage, cleaning, and transportation areas and structures;

Coal handling activities are confined to the active pit and underground portal areas, and the coal sizing/loading areas located north of the pit. All areas and facilities will be designed and constructed, utilized and maintained in conformance with industry standards and all applicable regulations. At the conclusion of mining, the facilities will be removed as part of final mine reclamation activities. Material from coal stockpile areas, and other areas of potential coal accumulation will be excavated and the excavated material placed in the final mined out pit.

528.200. Overburden;

Overburden will be excavated after the removal of topsoil and subsoil as defined in Chapter 2. The overburden excavation will be accomplished by utilizing hydraulic excavators with end dump haul trucks and dozers. This process will include excavating this material in a stairstep fashion that will include benches approximately every 40 feet in depth. These benches are planned to be approximately 40 feet in width and will create an overall 2h:1v slope for the highwalls to create a stable and safe working area. This is a conservative approach for initial mining and once mining begins, ongoing geotechnical studies and monitoring will be used to further define the proper slope angle to ensure slope stability while maximizing resource recovery.

Based on the overburden isopach map (Drawing 5-15), the overburden removal has been separated into three major stages. The first stage of overburden removal is the initial mining area, Pits 1-8. These pits have a relatively low strip ratio, approximately 5:1 (refer to Drawing 5-13). In order to efficiently remove overburden for this phase, spoil from the first three pits will be placed in an excess spoil area. This excess spoil structure will hold approximately 2.7 million loose cubic yards (LCY) of material. Once the excess spoil pile is filled, overburden from the next ~~4~~ 5 pits can then be used as pit backfill as the mining progresses through Pit ~~8~~9. ~~The completion of this phase is shown on Drawing 5-17.~~

~~Phase 2 requires mining to occur in two areas of the permit alternately. As mining progresses through Pits 9-13, the isopach (Drawing 5-15) shows that the overburden significantly increases. This increase and the shape of the mining boundary for the Permit Area requires a fill above approximate original contour. Material from Pits 9-13 significantly exceeds the backfill capacity available from the preceding pits (Pits 1-8). The fill above approximate original contour blends in with the excess spoil structure from Phase 1 and extends an additional 2,000 feet to the east as the mining sequence proceeds to Pit 15.~~

~~Also, mining begins with Pit 28 and proceeds alternately with Pits 9-13, north to Pit 23. The isopach shows that Pits 28 -23 have a relatively low strip ratio, approximately 4.2:1 increasing to 4.9:1 respectively. Overburden from Pit 28 will all be hauled to the excess spoil structure, with overburden from the successive pits to north back filling the previously mined. In this stage, the fill above original contour is approximately 3.0 million LCY. Drawing 5-18 (Phase 2) shows the details of this stage of the overburden removal and resulting landform.~~

~~Phase 3 overburden removal begins in Pit 14 and proceeds alternately with Pit 22 coming from the south to meet at Pit 18, the last pit to be mined. During this stage, the strip ratio reduces significantly from Phase 2 as mining progresses to Pit 18. As the strip ratio reduces to the south, significant backfill capacity is available in the preceding pits. This results in the distance between the backfill and the active coal face increasing. At the end of mining, an area will not be completely backfilled that is approximately 1,600 feet in length and 875feet wide and will require 3.3 million yards of fill to complete reclamation to approximate original contour. The backfill configuration at the end of this stage is shown in Drawing 5-19.~~

~~The proposed plan for backfilling these final pits includes acquiring the right to mine the adjacent federal coal reserves, located immediately west of this area. This plan provides an efficient method for transitioning operations into the federal reserves. At the time that this transition occurs, overburden will be removed from the federal reserves and placed in the final pits to approximate original contour. This final landform can be viewed on Drawing 5-35 and 5-36.~~

~~In the case that Alton Coal Development is not successful with acquiring the adjacent federal coal reserves, all the fill above approximate original contour and part of the excess spoil structure will be rehandled and placed back in the remaining backfill area. The final landform for this scenario is shown on Drawing 5-37. This step requires rehandle of approximately 2.5 million yards of spoil.~~

From the initial mining area, operations will proceed from the southeast ¼ of Section 30, beginning with pit 28 and proceeding north to pit 22. Pit 9 will not be backfilled at this stage; it has been left open for placement of the highwall miner to recover coal from panels 1-3. In hole 27 of Pit 9 Panel 3, the highwall miner head became lodged. Another head was leased in order to continue highwall mining in pits 22 and 23 while a recover plan was approved to mine Pit 10 and recover the lodged miner head. Pit 21 was then mined along the highwall panels in 21, then Pit10. Pit 10 will remain open for development of the underground portals and remain open until all underground coal is mined. Surface mining will continue with mining of Highwall Trench (HWT) 1 continuing south to HWT 3.~~If the alternative highwall mining is selected, highwall mining would begin in Pit 9. Then, once coal is removed from Pit 22, the coal east of Pits 22 and 23 will be mined using the highwall miner while Highwall Trench 1 (HWT1) is excavated utilizing Pit 9 as access.~~ Once mining is complete, the proposed plan for backfilling ~~Pit 9~~Highwall Trench 3 includes acquiring the right to mine the adjacent federal coal reserves, ~~located immediately southwest or north~~ east of Pit ~~9~~6. Also, some of the federal coal reserves can be recovered by underground mining which can be accessed through the underground portals located in Pit 10. In the case that Alton Coal Development is not successful with acquiring the adjacent federal coal reserves, all the fill above approximate original contour and part of the excess spoil structure will be rehandled and placed back in the remaining backfill areas (Pit 10 and Highwall Trench 3). In this method of mining, an unmanned cutter module is driven underground and operated in front of the highwall. The highwall mining machine stands on the pit floor or on a bench, directly in front of the exposed seam and makes long parallel rectangular drives into the coal seam. A remote-operated cutter module is pushed into the seam by a string of push beams (unmanned coal-conveying elements) that transport the mined coal back to the entry of the drive onto a stockpile. Coal is then removed to the sizing/loading area. The miner is moved along the face making successive pushes into the coal face. Once coal is removed from the Pits/ Highwall Trench, overburden from excavation of the next Highwall Trench is used to backfilled the mined out area continuing with the progression of the trench.

~~The anticipated coal removal sequence for the Highwall mining is shown on drawing 5-10A~~ As is depicted, each Pit/Highwall Trench consists of Panels, each panel consisting of 10 holes. The spacing between the holes and the spacing between the panels are dictated by the amount of overburden over the panels. The alternate Highwall mining is designed such that subsidence does not occur to the surface with nonyieldable webs and barriers. Specific information concerning these design are found in Appendix 5-8. Highwall mining will have only the disturbance associated with the pit/trench for placement of the highwall miner and will have no impact on the surface above the highwall panels.

The following tables show the material balance during the different phases of overburden removal for each scenario:

~~Preferred Scenario (Adjacent Federal Reserves Acquired)~~				
~~Phase~~	~~Overburden (LCY)~~	~~Available Backfill (LCY)~~	~~Excess Spoil (LCY)~~	~~Total Excess Spoil (LCY)~~
~~1~~	~~7,936,000~~	~~5,195,000~~	~~2,741,000~~	~~2,741,000~~

~~2~~	~~14,168,000~~	~~11,127,000~~	~~3,041,000~~	~~5,782,000~~
~~3~~	~~14,631,000~~	~~14,631,000~~	~~0~~	~~5,782,000~~
~~4 (Federal)~~	~~2,545,000~~	~~2,545,000~~	~~0~~	~~5,782,000~~
~~Total~~	~~39,280,000~~	~~33,498,000~~	~~5,782,000~~	~~5,782,000~~

~~*Loose Cubic Yards is estimated based on an overall 22% swell factor (Caterpillar Performance Handbook)~~

~~Alternate Scenario (Adjacent Federal Reserves Not Acquired)~~				
~~Phase~~	~~Overburden (LCY)~~	~~Available Backfill (LCY)~~	~~Excess Spoil (LCY)~~	~~Total Excess Spoil (LCY)~~
~~1~~	~~7,936,000~~	~~5,195,000~~	~~2,741,000~~	~~2,741,000~~
~~2~~	~~14,168,000~~	~~11,127,000~~	~~3,041,000~~	~~5,782,000~~
~~3~~	~~14,631,000~~	~~14,631,000~~	~~0~~	~~5,782,000~~
~~4 (Rehandle)~~	~~0~~	~~2,545,000~~	~~-2,545,000~~	~~3,237,000~~
~~Total~~	~~36,735,000~~	~~33,498,000~~	~~3,237,000~~	~~3,237,000~~

~~*Loose Cubic Yards is estimated based on an overall 22% swell factor (Caterpillar Performance Handbook)~~

~~Alternative~~ Preferred Scenario ~~(Highwall mining)~~				
Phase	Overburden (LCY)	Available Backfill (LCY)	Excess Spoil (LCY)	Total Excess Spoil (LCY)
1	7,936,000	5,195,000	2,741,000	2,741,000
2	7,381,000	7,277,000	104,000	2,845,000
3	5,257,000	5,257,000	0	2,845,000
4 (Federal)	2,545,000	2,545,000	0	2,845,000
Total	23,119,000	20,274,000	2,845,000	2,845,000

*Loose Cubic Yards is estimated based on an overall 22% swell factor (Caterpillar Performance Handbook)

The Preferred scenario for overburden removal will minimize overall disturbance and maximize resource recovery by providing a transition into the adjacent federal reserves with minimal effect to existing reclamation and backfill in the Permit Area. This scenario will also minimize variances from approximate original contour on the federal lands by eliminating the need for an excess spoil structure from the initial boxcut once operations are transitioned into these reserves.

During the course of mining, some additional excavated overburden may be placed temporarily on mined over and backfilled areas due to operational considerations. This material will be re-excavated and moved to it's final placement location as operations allow.

The underground mining will be accessed through portals in an existing pit. There will be no additional overburden removal associated with the underground mining; however, cross sections of the portal area are shown on Drawing 5-3B. Cover or overburden depths for the underground mining are described in Section 627.

All maps related to the overburden removal process can be viewed on Drawings 5-15 through 5-~~19~~17.

528.300. Spoil, coal processing waste, mine development waste, and noncoal waste removal, handling, storage, transportation, and disposal areas and structures;

528.310. Excess Spoil. Excess spoil will be placed in designated disposal areas within the permit areas, in a controllable manner to ensure mass stability and prevent mass movement during and after construction. Excess spoil will meet the design criteria of R645-301-535. For the purposes of SURFACE COAL MINING AND RECLAMATION ACTIVITIES, the permit application must include a description of the proposed disposal site and the design of the spoil disposal structures according to R645-301-211, R645-301-212, R645-301-412.300, R645-301-512.210, R645-528.310, R645-301-535.100 through R645-301-535.130, R645-301-535.300 through R645-301-535.500, R645-536.300, R645-301-542.720, R645-301-553.240, R645-301-745.100, R645-301-745.100, R645-301-745.300, and R645-301-745.400.

Excess spoil will be placed in the area designated on Drawing 5-3 and 5-35. This fill will be placed in lifts not to exceed 4 feet in thickness. The material will be transported from the overburden removal area to the fill by end dump haul trucks and a dozer(s) will spread the spoil to this lift thickness. The fill will meet at minimum 85% compaction as related to the standard Procter. Final slopes will be regraded to a maximum slope of 3h:1v. The top of the fill will be sloped to approximately 2% to prevent pooling of water and to reestablish drainage similar to original flow patterns. The excess spoil placed on the non-mined areas is approximately 32 acres and varies in height from 35 to 120 feet. The area of excess fill over mined out areas (variance from approximate original contour) is an extension of the fill placed on the non-mined area and is approximately 35 acres. Combined acreage of the excess fill placed on mined and non-mined areas is 67 acres and varies in height from 60 to 100 feet above original contour. Total excess fill is 5.8 million yards. Design of this fill can be viewed in Drawings 5-35 through 5-36 and the geotechnical study can be viewed in Appendix 5-1.

- *R645-301-211: The applicant will present a description of the premining soil resources as specified under R645-301-221. Topsoil and subsoil to be saved under R645-301-232 will be separately removed and segregated from other material.*

The soil resources for the proposed excess spoil disposal area are described in Appendix 2-1. A plan has been developed for removal of topsoil and suitable subsoil based on the soil descriptions in this appendices. The handling plan can be viewed on Drawing 2-2. Topsoil and acceptable subsoil will be separately removed and segregated from other material prior to placement of any spoil.

- *R645-301-212: After removal, topsoil will be immediately redistributed in accordance with R645-301-242, stockpiled pending redistribution under R645-301-234, or if demonstrated that an alternative procedure will provide equal or more protection for the topsoil, the Division may, on a case-by case basis, approve an alternative;*

  Excess spoil will have topsoil and subsoil redistributed in an approximately uniform, stable thickness with the approved post mining land use, contours and surface water drainage systems. Material handling practices will prevent excess compaction of these materials. Handling practices will also protect the materials from wind and water erosion before and after seeding and planting. These practices include seeding and grading stockpiles that will exist for more than year to stabilize the soil.

- *R645-301-412.300: Criteria for Alternative Postmining Land Uses.*

  The MRP does not contemplate Alternative Postmining Land Uses.

- *R645-301-512.210: Excess Spoil. The professional engineer experienced in the design of earth and rock fills will certify the design according to R645-301-535.100.*

  A professional engineer experienced in the design of earth and rock fills with assistance from a geotechnical expert has certified the design according to R645-301-535.100. These certifications can be viewed on Drawings 5-35, 5-36 and 5-17 through 5-19.

- *R645-301-512.220: Durable Rock Fills*

  No durable rock fills are planned.

- *R645-301-514.100: Excess Spoil. The professional engineer or specialist will be experienced in the construction of earth and rock fills and will periodically inspect the fill during construction. Regular inspections will also be conducted during placement and compaction of fill materials.*

  A professional engineer or specialist that is experienced in the construction of earth and rock fills will inspect the fill during construction and regular inspections will also be conducted during placement and compaction of fill materials.

- *R645-301-535.100 through R645-301-130: Disposal of Excess Spoil*

A geotechnical analysis of the excess spoil structure design has been completed by an expert in this field. The long term static safety factor for this structure design is estimated at 1.6 to 1.7. Lifts will be placed in thicknesses not to exceed 4 feet. The lifts will meet 85% compaction by the standard Procter. The fill will be graded to allow for drainage similar to original patterns and to prevent excessive infiltration of water. Fill will be covered with subsoil and topsoil as specified in Chapter 2 to provide conditions suitable for revegetation of the area. The geotechnical study can be viewed in Appendix A5-1.

- *R645-301-535.300 through R645-301-535.500: Disposal of Excess - Spoil Durable Rock Fills.*

  No durable rock fills are planned.

- *R645-301-536.300: Disposal of Coal Mine Waste in Excess Spoil*

  No coal mine waste is planned in the excess spoil area.

- *R645-301-542.720: Excess spoil will be placed in designated disposal areas within the permit area, in a controlled manner to ensure that the final fill is suitable for reclamation and revegetation compatible with the natural surroundings and the approved postmining land use. Excess spoil that is combustible will be adequately covered with noncombustible material to prevent sustained combustion. The reclamation of excess spoil will comply with the design criteria under R645-301-553.240.*

  The excess spoil as shown in Drawing 5-35 and 5-36 will be suitable to the surrounding area and for the postmining land use of primarily grazing. No combustible excess spoil will be placed in the proposed structure. The final reclamation of the spoil does not include any terraces and the slopes will not exceed 3h:1v.

- *R645-301-553.240: The final fill configuration of the fill (excess spoil) will be suitable for the approved postmining land use. Terraces may be constructed on the outslope of the fill if required for stability, control of erosion, to conserve soil moisture, or to facilitate the approved postmining land use. The grade of the outslope between terrace benches will not be steeper than 2h:1v (50 percent).*

  The excess spoil as shown in Drawings 5-35 and 5-36 will be suitable to the surrounding area and for the postmining land use of primarily grazing. The reclamation of the spoil does not include any terraces and the slopes will not exceed 3h:1v. The long term static safety factor for these slopes is estimated to be 1.6 to 1.7.

- *R645-301-745.100: General Requirements.*

745.110: Excess Spoil will be placed in designated disposal areas within the permit area, in a controlled manner to:

745.111: Minimize the adverse effects of leaching and surface water runoff from the fill on surface and underground water;

Reclamation of the excess spoil will include a topsoil cover and subsoil layer. Infiltration through the reclamation is expected to be minimal based on the high clay content of these soils. In addition, laboratory data for the overburden shows that there is minimal potential for leaching of pollutants should infiltration rates become higher than expected.

The foundation of the excess spoil area also has high clay content with minimal potential for infiltration. This will provide an additional, natural barrier to protect ground water present beneath the proposed structure.

745.112: Ensure permanent impoundments are not located on the completed fill. Small depressions may be allowed by the Division if they are needed to retain moisture or minimize erosion, create and enhance wildlife habitat or assist revegetation, and if they are not incompatible with the stability of the fill; and

Permanent impoundments are not planned on the excess spoil area. Small depressions may be constructed as allowed by the Division to retain moisture, minimize erosion, create and enhance wildlife habitat or assist revegetation.

745.113: Adequately cover or treat the excess spoil that is acid- and toxic forming with nonacid nontoxic material to control the impact on the surface and ground water in accordance with R645-301-731.300 and to minimize adverse effects on plant growth and approved postmining land use.

Laboratory data representative of the overburden planned for disposal in the excess spoil area does not show acid- and toxic forming characteristics.

745.120: Drainage Control. If the disposal area contains springs, natural or manmade water courses, or wet weather seeps, the fill design will include diversions and underdrains as necessary to control erosion, prevent water infiltration into the fill and ensure stability.

A spring and seep survey available in Chapter 7 has identified no springs or wet weather seeps in the proposed excess spoil area. The final surface will be regraded to a contour that will route water from snowmelt and rainfall around the excess spoil as shown on the final contours Drawing 5-35. There are no manmade water courses present in the excess spoil area. No underdrains are planned for the excess spoil structure.

745.121: Diversions will comply with the requirements of R645-301-742.300

No diversions are planned in the excess spoil area.

745.122 : Underdrains

No underdrains are planned in the excess spoil area.

745.300: Durable Rock Fills

No durable rock fills are planned.

745.400: Preexisting Benches

The MRP does not contemplate disposal of excess spoil on preexisting benches.

528.320. Coal Mine Waste.

The MRP does not contemplate processing coal that would produce coal mine waste.

528.321 Coal Processing Waste

The MRP does not contemplate processing coal that would produce coal processing waste that would be returned to the Underground workings.

528.322. Refuse Piles.

The MRP does not contemplate the construction of any refuse piles,

528.323. Burning and Burned Waste Utilization.

The MRP does not contemplate processing coal that would produce coal mine waste, eliminating the any potential for coal mine waste fires.

528.330. Noncoal Mine Waste.

Noncoal mine wastes including, but not limited to, grease, lubricants, paints, flammable liquids, garbage, abandoned mining machinery, lumber and other combustible materials generated during mining activities will be temporarily stored in appropriate containers and removed from the permit area and will be properly disposed of according to applicable State and Federal regulations.

528.332.

Final disposal of noncoal mine wastes will be in a State-approved solid waste disposal site not located within the permit area. ~~One e~~Exceptions to the removal of all noncoal mine waste from the permit area is perforated piping used in the construction of Alluvial

Ground Water Drains will be left in place as mining advances. This perforated piping will be covered in place approximately 20' to 30' below the final reclaimed surface. All other waste materials (ie. metal culvert) associated with the Alluvial Ground Water Drains will be removed and disposed of in a State-approved solid waste disposal site. Also, concrete pads for the generator and fan utilized in the underground operation will remain and will be covered with approximately 120' of overburden.

528.333.

At no time will any noncoal mine waste be deposited in a refuse pile or impounding structure, nor will any excavation for a noncoal mine waste disposal site be located within eight feet of any coal outcrop or coal storage area.

528.334.

Notwithstanding any other provision to the R645 Rules, any noncoal mine waste defined as "hazardous" under 3001 of the Resource Conservation and Recovery Act (RCRA) (Pub. L. 94-580, as amended) and 40 CFR Part 261 will be handled in accordance with the requirements of Subtitle C of RCRA and any implementing regulations.

528.340

As development of the Underground workings originates in the existing Surface mining Pit, development wastes have been stored in the excess spoils pile. Once all mining is complete spoils will be returned to the mined out Pit following the surface mining regulations.

528.350. Acid-Forming and Toxic Materials

If coal, having qualities that make it unmarketable, are to be left in the pit backfill in quantities greater than 5,000 tons: a minimum of 1 composite sample per 5,000 Tons of coal will be analyzed for the parameters list in Table 3 and 7 of the "Soil and Overburden Guidelines". A record of the volume of coal remaining and laboratory analytical results will be kept onsite. Debris, acid-forming, toxic-forming materials and materials constituting a fire hazard will be identified and disposed of in accordance with R645-301-528.330, R645-301-537.200, R645-301-542.740, R645-301-553.100 through R645-301-553.600, R645-301-553.900, and R645-301-747. Appropriate measures will be implemented to preclude sustained combustion of such materials; and

528.400. Dams, embankments and other impoundments.

Plans do not include using dams, embankments or other impoundments for disposal of coal, overburden, excess spoil or coal mine waste

529. **MANAGEMENT OF MINE OPENINGS**.

When no longer required, underground mine openings will be closed in accordance with R645-301-513, R645-301-529, R645-301-551 and MSHA approved requirements and backfilled.

Each entry to the Underground mine if temporarily inactive, but having further projected useful service will be secured by barricades or other covering devices and posted with signs, to prevent access into the entry and identify the hazardous nature of the openings.

~~Alternative h~~Highwall mining will produce openings (holes) in the coal at the bottom of trenches specifically constructed for highwall mining. Trench depth to the holes range from 60 feet to 200 feet. After highwall mining is completed in a given trench, that trench will be completely backfilled, burying any openings made by highwall mining.

All wells will be managed to comply with R645-301-748 and R645-301-765. Water monitoring wells will be managed on a temporary basis according to R645-301-738.

Wells constructed for monitoring groundwater conditions in the proposed Coal Hollow Mine permit and adjacent area, including exploration holes and boreholes used for water wells or monitoring wells, will be designed to prevent contamination of groundwater and surface-water resources and to protect the hydrologic balance. A diagram depicting typical monitoring well construction methods is shown in Drawing 7-11. Monitoring wells will include a protective hydraulic seal immediately above the screened interval, an annular seal plugging the borehole above the hydraulic seal to near the ground surface, and a concrete surface seal extending from the top of the hydraulic seal to the ground surface which is sloped away from the well casing to prevent the entrance of surface flows into the borehole area. Well casings will protrude above the ground surface a sufficient height so as to minimize the potential for the entrance of surface water or other material into the well. A steel surface protector with a locking cover will be installed at monitoring wells to prevent access by unauthorized personnel. Where there is potential for damage to monitoring wells, the wells will be protected through the use of barricades, fences, or other protective devices. These protective devices will be periodically inspected and maintained in good operating conditions. Monitoring wells will be locked in a closed position between uses.

When no longer needed for monitoring or other use approved by the Division upon a finding of no adverse environmental or health and safety effects, or unless approved for transfer as a water well under R645-301-731.100 through R645-301-731.522 and R645-301-731.800, each well will be capped, sealed, backfilled, or otherwise properly managed, as required by the Division in accordance with R645-301-529.400, R645-301-631.100, and R645-301-748. Permanent closure measures will be designed to prevent access to the mine workings by people, livestock, fish and wildlife, machinery and to keep acid or other toxic drainage from entering ground or surface waters.

If a water well is exposed by coal mining and reclamation operations, it will be permanently closed unless otherwise managed in a manner approved by the Division.

Permanent closure and abandonment of water wells greater than 30 feet in depth will be in accordance with the requirements of "Administrative Rules for Water Well Drillers", State of Utah, Division of Water Rights or other applicable state regulations. Abandonment of wells will be performed by a licensed water well driller. The wells to be abandoned will be completely filled using neat cement grout, sand cement grout, unhydrated bentonite, or bentonite grout, or other materials approved by the Utah State Engineer's office. Alternatively, the well may be abandoned using a different procedure upon approval from the Utah State Engineer's office.

Abandonment materials will be introduced at the bottom of the well or required sealing interval and placed progressively upward to the top of the well. The casing will be severed a minimum of 2 feet below the ground surface. A minimum of 2 feet of compacted native material will be placed above the abandoned well upon completion.

Within 30 days of the completion of well abandonment procedures, a report will be submitted to the State Engineer by the responsible licensed driller giving data related to the abandonment of the well. This shall include the name of the licensed driller or other person(s) performing abandonment procedures, name of well owner at the time of abandonment, the address or location of the well by section, township, and range, abandonment materials and equipment used, water right or file number covering the well, the final disposition of the well, and the date of completion.

Exploration holes and boreholes will be backfilled, plugged, cased, capped, sealed, or otherwise managed to prevent acid or toxic contamination of water resources and to minimize disturbance to the prevailing hydrologic balance. Exploration holes and boreholes will be managed to ensure the safety of people, livestock, fish and wildlife, and machinery.

If a water well is exposed by coal mining and reclamation operations, it will be permanently closed unless otherwise managed in a manner approved by the Division.

If any exploration boreholes are to be used as monitoring wells or water wells, these will meet the provisions of R645-301-731

Boreholes will be backfilled to within 1 foot of the land surface with concrete or other materials approved by the Division as necessary to prevent contamination of groundwater or surface-water resources or to protect the prevailing hydrologic balance. The upper approximately 1 foot will be backfilled with native materials to facilitate reclamation (see Drawing 6-11). Exploration holes and boreholes that may be uncovered during mining and reclamation activities will be permanently closed unless approved for water monitoring or otherwise managed in a manner approved by the Division.

530 **OPERATIONAL DESIGN CRITERIA AND PLANS:**

531 GENERAL:

There are five sediment impoundments proposed for the permit area. These structures will be constructed using a combination of dozers and backhoes. The structures have been designed to contain the required storm events as specified in Appendix 5-2. The structures will have sediment removed as necessary to ensure the required capacities. Details for these structures can be viewed on Drawings 5-25, 5-26 and 5-28 through 5-32. Calculations and supporting text can be viewed in Appendix 5-2.

There are no other coal processing waste banks, dams or embankments proposed within the permit area.

Underground mining has not occurred within the permit area.

532 SEDIMENT CONTROL:

Four diversion ditches along with five sediment impoundments are proposed for the permit area. In addition, miscellaneous controls such as silt fence and berms are also proposed for specific areas. The proposed locations for these structures are shown on Drawing 5-3. Details associated with these structures can be viewed on Drawings 5-25 through 5-34 and Appendix 5-2.

Mulch will be placed on the seedbed surface once soil amendments have been incorporated and seeding has been accomplished in areas that will be reclaimed to native plant communities. The mulch should control erosion by wind and water, decrease evaporation and seed predation, and increase survivability of the seeded species. Like the seeding methods, mulch will be applied with a variety of techniques and materials depending on the reclaimed area.

532.100 Disturbed Area:

The smallest practicable area, consistent with reasonable and safe mine operational practices will be disturbed at any one time during the mining operation and reclamation phases. This will be accomplished through progressive backfilling, grading, and prompt revegetation of disturbed areas. An estimated reclamation schedule is shown on Drawing 5-38 or ~~5-38A for alternative mining~~.

532.200 Backfill Stabilization:

The backfilled material will be stabilized by grading to promote a reduction of the rate and volume of runoff in accordance with the applicable requirements. The excess spoil and fill above approximate original contour will be graded to a maximum angle 3h:1v slope and revegetated to minimize erosion. This area is designed with concave slopes and slope irregularities that will also assist in minimizing erosion. A geotechnical analysis of this configuration has been completed and the factor of safety is estimated at 1.6 to 1.7. This analysis can be viewed in Appendix A5-1. The remaining backfill will be placed in the mined out pit, and thus confined on all sides. The backfill will be inherently stable.

Mulch will be placed on the seedbed surface once soil amendments have been incorporated and seeding has been accomplished in areas that will be reclaimed to native plant communities. The mulch should control erosion by wind and water, decrease evaporation and seed predation, and increase survivability of the seeded species. Like the seeding methods, mulch will be applied with a variety of techniques and materials depending on the reclaimed area.

533. IMPOUNDMENTS.

533.100.

No impoundments meeting the NRCS Class B or C criteria for dams in TR-60, or the size or other criteria of 30 CFR Sec. 77.216(a) are planned for the Coal Hollow Mine.

533.110

Impoundments not included in 533.100, will be designed and constructed with a minimum static safety factor of 1.3 for a normal pool with steady state seepage saturation conditions or meet the requirements of R645-301-733.210.

The proposed sediment impoundments are expected to impound seasonal water and storms. A geotechnical analysis of these designs has been performed and can be reviewed in Appendix 5-1. Static safety factors for the proposed designs range from 2.2 to 5.3.

533.200. Foundations.

Foundations for temporary and permanent impoundments will be designed so that

- *Foundations and abutments for the impounding structure are stable during all phases of construction and operation. Such foundations for temporary and permanent impoundments will be designed based on adequate and accurate information on the foundation conditions*

Refer to Appendix 5-1 for information related to foundations of the proposed impounding structures. No permanent impoundments are proposed.

- *All vegetative and organic materials will be removed and foundations excavated and prepared to resist failure. Cutoff trenches will be installed if necessary to ensure stability.*

  All vegetation, topsoil and subsoil as identified in Chapter 2 will be removed from the impoundment areas prior to construction. Cutoff trenches will not be necessary for stability.

- *Slope protection will be provided to protect against surface erosion at the site and protect against sudden drawdown.*

  Slopes of impoundments will be seeded and sloped to protect against erosion at the site. The high clay content and compaction characteristics of the material present at the impoundments will also assist with minimizing erosion of the slopes.

- *Faces of embankments and surrounding areas will be vegetated except that faces where water is impounded may be riprapped or otherwise stabilized in accordance with accepted design practices.*

  Faces of embankments will be vegetated to minimize erosion. Standing water in the ponds is expected to be minimal and therefore these faces will also be seeded for erosion control.

- *The vertical portion of any remaining highwall will be located far enough below the low- water line along the full extent of highwall to provide adequate safety and access for the proposed water users.*

  All highwalls will be fully covered following active use and backfilling of pits.

533.300

A rapid drawdown analysis was completed assuming the spillways are plugged, the basin fills to top of the embankments and then the water is released or pumped down to the base of basins. The soil strengths utilized were based on total stress conditions as determined from the triaxial shear tests completed for this project. It should be noted that rapid drawdown is highly unlikely since spillway and outlet piping will be no more than 4-feet below the top of embankments. The resulting safety factors under these conditions range from 1.2 to 1.9. Based on this analysis, no additional protection measures are needed for the impoundments in relation to rapid drawdown. Details for this analysis are provided in Appendix 5-1, pages 6 through 7 in the main section of the report.

533.600.

The MRP does not contemplate construction of impoundments that meet the criteria of MSHA, 30 CFR 77.216(a).

533.700 - 714. <u>Plans.</u>

Each detailed design plan for structures not included in 533.610 shall:

- *Be prepared by, or under the direction of, and certified by a qualified, registered, professional engineer, except that all coal processing waste dams and embankments covered by R645-301-536 and R645-301- 746.200 shall be certified by a qualified, registered, professional engineer;*

  Designs for the proposed impoundments have been prepared by a qualified, registered, professional engineer, with assistance from a geotechnical expert. These certifications can be viewed on Drawings 5-28 through 5-31.

- *Include any design and construction requirements for the structure, including any required geotechnical information;*

  A geotechnical analysis of the impoundments has been prepared by an expert in this field. This analysis can be viewed in Appendix 5-1. Embankments will be constructed in 2 foot lifts as recommended by the analysis.

- *Describe the operation and maintenance requirements for each structure; and*

  The proposed impoundments are designed to temporarily store water from storm events and snow melt. Long term standing water in the impoundments is anticipated to be seasonal and sediment will be removed as necessary to provide the required storage capacities. Emergency spillways have been included in the designs to provide a non-destructive discharge route should the capacities ever be exceeded. Surveys of these impoundments will be regularly conducted to ensure that design capacities are available.

- *Describe the timetable and plans to remove each structure, if appropriate.*

  All impoundments will be reclaimed at the end of operations. The estimated timeline for removal of these structures are shown on Drawing 5-38. Expected removal is year ~~four~~ seven of the mining and reclamation process. In areas where soils are not stabilized following the removal of these sediment impoundments, silt fence will be appropriately installed and maintained to provide sediment control until stable conditions are met.

Detailed designs of impoundments can be viewed on Drawings 5-28 through 5-31. Locations can be viewed on Drawing 5-3 and 5-25.

534. **ROADS**

534.100-200 Roads will be located, designed, constructed, reconstructed, used, maintained, and reclaimed so as to:

- *Prevent or control damage to public or private property;*

  All roads will be reclaimed to approximate original contour as shown on Drawings 5-35, 5-36 and 5-38. These roads are designed to control damage to public and private property.

- *Use nonacid - or nontoxic-forming substances in road surfacing; and*

  There will be no acid or toxic forming substances used in road surfacing.

- *Have, at a minimum, a static safety factor of 1.3 for all embankments.*

  All embankments are designed with static safety factors that exceed 1.3.

- *Have a schedule and plan to remove and reclaim each road that would not be retained under an approved postmining land use.*

  All roads not planned to remain postmining will be removed and reclaimed according to Drawings 5-35 and 5-36. The estimated timetable for removing these roads is shown on Drawing 5-38.

- *Control or prevent erosion, siltation and the air pollution attendant to erosion by vegetating or otherwise stabilizing all exposed surfaces in accordance with current, prudent engineering practices.*

  Cut ditches will be established on the shoulders of all primary roads to control drainage and erosion. Cut and fill slopes along the primary roads will be minimal and are not expected to cause significant erosion. In locations where there are culvert crossings (i.e. Lower Robinson Creek), the fills slopes will be stabilized by utilizing standard methods such as grass matting or straw wattles.

- *To ensure environmental protection and safety appropriate for their planned duration and use, including consideration of the type and size of equipment used, the design and reconstruction of roads will incorporate appropriate limits for grade, width, surface materials, and any necessary design criteria established by the Division.*

The following specifications apply to the Primary Mine Haul roads:

1) Roads will be approximately 80' in width
2) Approximately a 2% crown
3) Approximately one foot deep cut ditches along shoulders for controlling storm water
4) 18" of crushed rock or gravel for road surfacing
5) Cut and fill slopes of 1.5 h:1v
6) Minimum fill over each culvert will be 2 times diameter of culvert

7) Berms placed as necessary along fills

The underground mine portal access and haul road in Pit 10 will also be a primary road. This road is accessed from the main haul road from the coal unloading area. The underground access road will be approximately 500' in length and will be constructed to the same specifications for the haul roads above, except that the road may be narrowed to a 40 foot width.

The ancillary roads will have similar specifications except surfacing will occur only as needed and may be narrowed to a 40 foot road width. A typical cross section for the ancillary roads can be viewed on Drawing 5-24.

The location and details for Primary Mine Haul roads can be viewed on Drawings 5-3 and 5-22 and 5-23.

In addition to the two roads primary Mine Haul roads, the road located within the facilities area is also classified as a primary road. This road is planned to be 24 feet wide with 24 inches of compacted sub base and 8 inches of compacted 1 inch minus gravel as surfacing. This road is referred to as "Facilities Roadway" and more details are described in 527.200 along with Drawings 5-22A and 5-22B.

In addition to the primary roads that will be present during active mining, four additional roads are planned to exist postmining and are also classified as primary roads for this reason.

Roads that will remain postmining are the following:

- Road to Water Well with details shown on Drawing 5-22D
- Road to east C. Burton Pugh property (K3993) with details shown on Drawing 5-22C
- County Road 136 (K3900) with details on Drawing 5-22E, 5-22F and 5-22G. This County road will be reconstructed within the permit area by Kane County. This reconstruction will occur concurrently with the final stage of reclamation as scheduled on Drawing 5-38 and is expected to be completed by the end of Year 4.
- Road to Swapp Ranch (same specification as the Water Well Road)

The location of these roads is shown on Drawings 5-35 and 5-37 along with the post mining topography.

The ramps, benches and equipment travel paths within the active surface mining area are temporary in nature and will be relocated frequently as mining progresses. These temporary travelways are considered part of the pit due to their short term use, and are not individually designed nor engineered. They will be built and maintained to facilitate safe and efficient mine and reclamation operations.

534.300-340. Primary Roads.

Primary roads will:

- *Be located, insofar as practical, on the most stable available surfaces;*

  These roads are designed on the most practicable, stable surfaces.

- *Be surfaced with rock, crushed gravel, asphalt, or other material approved by the Division as being sufficiently durable for the anticipated volume of traffic and the weight and speed of vehicles using the road;*

  Primary roads haul roads will be surfaced with approximately 18" of crushed rock or gravel to provide a durable surface for the anticipated volume of traffic and equipment.

- *Be routinely maintained to include repairs to the road surface, blading, filling potholes and adding replacement gravel or asphalt. It will also include revegetation, brush removal, and minor reconstruction of road segments as necessary; and*

  All roads will be maintained on an as needed basis using motor graders, water trucks for dust suppression, and other equipment as necessary. Crushed stone and/or gravel will be used as a surface course for primary roads outside the active mining area, and may be used as needed for ramps and travelways within the pit. Should the roads be damaged by a catastrophic event, such as an earthquake or a flood, repairs will be made as soon as possible after the damage has occurred or the road will be closed and reclaimed. Roads will be reclaimed once they are no longer needed for their intended use.

- *Have culverts that are designed, installed, and maintained to sustain the vertical soil pressure, the passive resistance of the foundation, and the weight of vehicles using the road.*

  Road fill over culverts will be at minimum two times the diameter of the culvert. This is a conservative standard that has been effectively utilized at mining operations with similar equipment and mining practices.

535. **SPOIL**

535.100 -150 Disposal of Excess Spoil. *Excess spoil will be placed in designated disposal areas within the permit area in a controlled manner. The fill and appurtent structures will be designed using current, prudent engineering practices and will meet any design criteria established by the Division.*

- *The fill will be designed to attain a minimum long-term static safety factor of 1.5. The foundation and abutments of the fill must be stable under all conditions of construction.*

  A geotechnical analysis has been completed for the proposed excess spoil structure. This analysis estimates the long-term safety factor to be 1.6 to 1.7 based on the proposed design. Following proper construction practices of building the structure in maximum four foot lifts and meeting 85% compaction based on the standard Procter will ensure that the structure will be stable under all conditions of construction. The following earthwork specifications will be followed:

  1) Areas to receive fill will be stripped of all vegetation, organic material, and debris. Any existing undocumented or non-structural fill/backfill materials and other unsuitable materials will be excavated in their entirety. All areas that are to receive fill will be observed by a professional engineer experienced in the design of earth and rock fills prior to placement of fill.

  2) Fill will be compacted to 85% of the maximum density as compared to ASTM D 698 (standard proctor) for the spoil.

  3) Individual lift thickness will not exceed 4 feet, unless approved by both the Division and the professional engineer based on compaction test results during field verification.

  4) Saturated soils will be placed in an area that will have minimal effect on the performance of slopes.

  5) A qualified professional engineer with experience in the design of earth and rock fills will periodically observe the placement of fill and conduct in-place field density tests on the fill to check for adequate moisture and relative compaction. The compaction tests will be conducted as part of the periodic inspections required in R645-301-514.100, 514.311, and R645-301-514.120. These compaction tests will be conducted using nuclear density (ASTM D2292-9) or equivalent method. If less than the specified relative compaction is obtained, additional compactive effort will be applied and the fill moisture-conditioned as necessary until the specified relative compaction is attained.

  6) Wherever, in the opinion of the ACD's representatives, an unstable condition is being created, the work will not proceed in that area until an evaluation has been made and the grading operations revised, if necessary.

7) During unfavorable weather conditions, construction of the fill will not proceed without confirmation from the professional engineer experienced in the design of earth and rock fills.

This construction will occur only in the designated excess spoil area as shown on Drawing 5-3 and 5-35. The fill will be placed with end dump haul trucks and lifts will be constructed using dozers. High precision GPS systems will be regularly utilized to check grades and appropriate lift thickness. The geotechnical analysis for this structure can be viewed in Appendix 5-1.

- *Be located on the most moderately sloping and naturally stable areas available, as approved by the Division, and placed, where possible, upon or above a natural terrace, bench or berm, if such placement provides additional stability and prevents mass movement;*

  The excess spoil is planned to be placed in an area where natural grades range from 0 to 5%. This is one of the most moderately sloping locations in the Permit Area. Stability of this structure is estimated to be 1.6 to 1.7 based on the Appendix 5-1.

- *Be subject of sufficient foundation investigations. Any necessary laboratory testing of foundation material, will be performed in order to determine the design requirements for foundation stability. The analyses of foundation conditions will take into consideration the effect of underground mine workings, if any, upon the stability of the fill and appurtent structures; and*

  Geotechnical borings were completed in the foundation of the proposed disposal area. Laboratory analysis of these borings has also been completed. Details of this analysis can be viewed in Appendix 5-1.

- *Incorporate keyway cuts (excavations to bedrock) or rock buttresses to ensure stability where the slope in the disposal area is in excess of 2.8h:1v (36 percent), or such lesser slope as may be designated by the Division based on local conditions. Where the toe of the spoil rests on a downslope, stability analyses will be performed in accordance with R645-301-535.150 to determine the size of rock toe buttresses and keyway cuts*

  Permanent slopes for the proposed excess spoil will not exceed 3h:1v (33 percent), therefore no keyway cuts have been proposed in the design. Appendix 5-1 details the stability analysis for the proposed structure.

- *Excess spoil may be disposed of in underground mine workings,..*

  Excess spoil will not be disposed of in underground mine workings.

- *Placement of Excess Spoil. Excess spoil will be transported and placed in a controlled manner in horizontal lifts not exceeding four feet in thickness; concurrently compacted as necessary to ensure mass stability and to prevent mass movement during and after construction; graded so that surface and subsurface drainage is compatible with the natural surroundings: and covered with topsoil or substitute material in accordance with R645-301-232.100 through R645-301-232.600, R645-301-234, R645-301-242, and R645-301-243. The Division may approve a design which incorporates placement of excess spoil in horizontal lifts other than four feet in thickness when it is demonstrated by the operator and certified by a professional engineer that the design will ensure the stability of the fill and will meet all other applicable requirements.*

  Horizontal lifts will not exceed four feet in thickness unless otherwise approved by the Division. The lifts will be concurrently compacted to meet 85% of the standard Procter. The geotechnical analysis (Appendix 5-1), provides information showing that these construction standards will provide mass stability and will prevent mass movement during and after construction. The excess spoil will be graded to provide drainage similar to original flow patterns. Topsoil and subsoil as designated in Chapter 2 will be removed and separated from other materials prior to placement of spoil.

- *For the purposes of SURFACE COAL MINING AND RECLMATION ACTIVITIES the design of the spoil disposal structures will include the results of geotechnical investigations as follows:*

  1) *The Character of the bedrock and any adverse geologic conditions in the disposal area;*

     Refer to Appendix 5-1.

  2) *A survey identifying all springs, seepage, and ground water flow observed or anticipated during wet periods in the area of the disposal site;*

     Spring and seep survey information is provided on Drawing 7-1. There are no springs or seeps identified in the excess spoil area.

  3) *A survey of the potential effects of subsidence of the subsurface strata due to past and future mining operations;*

     There no historical underground mining operations in the proposed excess spoil area. There are also no future underground operations proposed.

  4) *A technical description of the rock material to be utilized in the construction of those disposal structures containing rock chimney cores or underlain by a rock drainage blanket; and*

There are no rock chimneys or drainage blankets proposed.

5) *A stability analysis including, but not limited to, strength parameters, pore pressures and long-term seepage conditions. These data will be accompanied by a description of all engineering design assumptions and calculations and the alternative considered in selecting the specific design specifications and methods.*

   The stability analysis and all supporting data are available in Appendix 5-1.

- *If for the purposes of SURFACE COAL MINING AND RECLAMATION ACTIVITIES, under R645-301-535.112 and R645-301-535.113, rock-toe buttresses or key-way cuts are required, the will include the following:*

  Neither rock-toe buttresses or key-way cuts are required under R645-301-535.112 or R645-301-535.113.

535.200. Disposal of Excess Spoil: Valley Fills/Head-of-Hollow Fills.

The MRP does not contemplate disposal of excess spoil as valley fill or head-of-hollow fills.

535.300. Disposal of Excess Spoil: Durable Rock Fills.

The MRP does not contemplate disposal of excess spoil as durable rock fill.

535.400. Disposal of Excess Spoil: Preexisting Benches.

The MRP does not contemplate disposal of excess spoil on preexisting benches.

535.500 Disposal of Excess Spoil: At Drift Entries.

The MRP does not comptemplate disposal of spoils resulting from face-up operations at the drift entries. Drift entries will originate from the existing Pit, excess spoil for which are stored in the approved Excess Spoils Pile.

536. Coal Mine Waste.

The MRP does not contemplate processing of coal that would produce coal mine waste.

537 **REGRADED SLOPES**:

537.100 Geotechnical Analysis:

The excess spoil structure and fill above approximate original contour are the only alternative specifications proposed. A geotechnical analysis has been completed for this proposal and can be viewed in Appendix 5-1. All other mined areas, for surface or underground will be restored to approximate original contour.

540 **RECLAMATION PLAN**:

541.100 - 400 General

When coal mining is completed, all pits will be backfilled and reclaimed in accordance with the R645 rules and this permit. All equipment, structures, and other facilities, unless approved by the Division as suitable for the postmining land use or environmental monitoring, will be removed and the affected land reclaimed.

Underground mine portals will be closed in accordance with R645-301-513, R645-301-529, R645-301-551 and approved MSHA plans and backfilled.

Since the underground mine portals are located in the bottom of Pit 10, they will be reclaimed and permanently closed by the backfilling of the pit to a depth of greater than 100' when no longer required.

When no longer needed for monitoring or other use approved by the Division upon a finding of no adverse environmental or health and safety effects, or unless approved for transfer as a water well under R645-301-731.100 through R645-301-731.522 and R645-301-731.800, each well will be capped, sealed, backfilled, or otherwise properly managed, as required by the Division in accordance with R645-301-529.400, R645-301-631.100, and R645-301-748. Permanent closure measures will be designed to prevent access to the mine workings by people, livestock, fish and wildlife, machinery and to keep acid or other toxic drainage from entering ground or surface waters.

If a water well is exposed by coal mining and reclamation operations, it will be permanently closed unless otherwise managed in a manner approved by the Division.

Permanent closure and abandonment of water wells greater than 30 feet in depth will be in accordance with the requirements of "Administrative Rules for Water Well Drillers", State of Utah, Division of Water Rights or other applicable state regulations. Abandonment of wells will be performed by a licensed water well driller. The wells to be abandoned will be completely filled using neat cement grout, sand cement grout, unhydrated bentonite, or bentonite grout, or other materials approved by the Utah State Engineer's office. Alternatively, the well may be abandoned using a different procedure upon approval from the Utah State Engineer's office.

Abandonment materials will be introduced at the bottom of the well or required sealing interval and placed progressively upward to the top of the well. The casing will be severed a minimum of 2 feet below the ground surface. A minimum of 2 feet of compacted native material will be placed above the abandoned well upon completion.

Within 30 days of the completion of well abandonment procedures, a report will be submitted to the State Engineer by the responsible licensed driller giving data related to the abandonment of the well. This shall include the name of the licensed driller or other person(s) performing abandonment procedures, name of well owner at the time of abandonment, the address or location of the well by section, township, and range, abandonment materials and equipment used, water right or file number covering the well, the final disposition of the well, and the date of completion.

Exploration holes and boreholes will be backfilled, plugged, cased, capped, sealed, or otherwise managed to prevent acid or toxic contamination of water resources and to minimize disturbance to the prevailing hydrologic balance. Exploration holes and boreholes will be managed to ensure the safety of people, livestock, fish and wildlife, and machinery.

If a water well is exposed by coal mining and reclamation operations, it will be permanently closed unless otherwise managed in a manner approved by the Division.

If any exploration boreholes are to be used as monitoring wells or water wells, these will meet the provisions of R645-301-731

Boreholes will be backfilled to within 1 foot of the land surface with concrete or other materials approved by the Division as necessary to prevent contamination of groundwater or surface-water resources or to protect the prevailing hydrologic balance. The upper approximately 1 foot will be backfilled with native materials to facilitate reclamation (see Drawing 6-11). Exploration holes and boreholes that may be uncovered during mining and reclamation activities will be permanently closed unless approved for water monitoring or otherwise managed in a manner approved by the Division.

542 **NARRATIVE, DRAWINGS AND PLANS**:

542-100 through 600 Plan and Timetable.

Reclamation at the Coal Hollow Mine includes both ongoing reclamation and final reclamation activities. Ongoing reclamation will follow mining operations as closely as practicable during the mine production phase. Major steps in the ongoing reclamation process are:

- Backfilling and Grading. The planned backfilling and grading operations are described more fully under section 553 below.
- Topsoil and Subsoil Replacement. Following grading, suitable topsoil and subsoil will be replaced on the regraded area. Topsoil may be direct placed from areas ahead of the mine, or may be taken from available stockpiled material. The

planned topsoil operation will have topsoil ahead of the operation dozed into windrows, and loaded into trucks by a front end loader. The trucks will haul the topsoil to the regraded area, or to a temporary topsoil stockpile. Subsoil will be handled similar to topsoil. Once dumped on the regraded area, topsoil and subsoil layers will be dozed to a consistent thickness. Approximately 8 inches of topsoil is expected to be removed ahead of mining and replaced over the regraded area. Subsoil removed and replaced will average 40 inches thick and will be placed between the topsoil layer and run of mine spoil. The total profile thickness of topsoil and subsoil in mined areas will average 48 inches. Once in place, the area will be fine graded to remove small erosion features and depressions.

- Revegetation. Following replacement of topsoil the area will be revegetated by seeding. Mulch will be placed on the seedbed surface once soil amendments have been incorporated and seeding has been accomplished in areas that will be reclaimed to native plant communities. The mulch should control erosion by wind and water, decrease evaporation and seed predation, and increase survivability of the seeded species. Like the seeding methods, mulch will be applied with a variety of techniques and materials depending on the reclaimed area.

Generally, mined areas will be backfilled and graded within approximately 180 days following coal removal, or 1,500 feet of the active coal removal face. One exception to this standard is during mining and backfilling of the Highwall Trench south of Pit ~~9~~10. During this phase of mining, Pit ~~9~~ 10will be left open for access to the Highwall Trench and underground mine. A detailed description of the reason for this variation are fully described in section 528 (Overburden) and the major steps can be viewed on Drawing~~s~~ 5-17~~ through 5-19~~. Areas needed for in-pit roads, ramps, drainage controls or areas which must be left open temporarily for operational reasons will be backfilled and graded when they are no longer needed. The rate of backfilling will depend on the availability of mined out pit areas for backfilling, and the rate of production at the mine. Based on anticipated production rates, Drawing 5-38, ~~or Drawing 5-38A if the alternative highwall mining is selected,~~ provides an estimated sequence and timing for reclamation.

Topsoil will be replaced on the graded areas as soon as operationally practicable. This work will depend on weather and soil conditions in the removal and replacement areas, but is generally anticipated to occur within 90 days of completion of regrading.

Revegetation activities will be seasonal in nature. As currently planned, initial seeding will occur at the first planting opportunity following replacement of topsoil. Supplemental seeding may be done subsequently as needed.

Some delay is unavoidable in reclamation of the initial mining areas due to the time required to establish the initial working pit and backfill area, and to achieve a steady state excavation/backfill operation. As currently planned the initial mining areas will be backfilled to the planned post mining contour, graded, and the topsoil replaced by late in the first year or in the first half of the second year of mining. Reclamation activities will proceed at the regular planned rate thereafter. Proposed final reclamation contours and cross sections can be viewed on Drawings 5-35 and 5-36 for the preferred reclamation scenario and on Drawing 5-35 and 5-35A for the alternate reclamation scenario.

The sequence and timing of reclamation activities is dependent on the coal production rate. Should that rate differ significantly from the current plan, the reclamation schedule will also vary.

Final reclamation includes the following:

- Backfilling and Grading. Backfilling of all final pits will commence at the conclusion of coal production. All highwalls, spoil piles, and depressions will be removed, except that small depressions may be constructed if they are needed to retain moisture, minimize erosion, create and enhance wildlife habitat, or assist revegetation. No permanent final pit impoundments are currently planned. The excess spoil structure will remain. All exposed coal seams, and acidic or toxic-forming strata will be covered with at least five feet of noncombustible material.
- Topsoil and Subsoil Replacement. 8 inches of topsoil underlain by 40 inches of subsoil will be placed on the backfilled pits and excess spoil. Other disturbed areas will have topsoil replaced (including facilities sites, roads etc.).
- Removal of Structures. Before abandoning the permit area or seeking bond release, all structures not needed for the approved post mining land use will be removed and reclaimed. The Lower Robinson Creek diversion is proposed to be temporary. Material from the coal stockpile base area and other areas where coal spillage may accumulate will be excavated and placed in a controlled manner in the final pit and covered with noncombustible material to prevent sustained combustion. The only structure planned to exist postmining is the water well with details shown in Drawing 5-8C and location shown on 5-3, 5-35 and 5-37.
- Removal of Roads. Roads not retained for use under an approved postmining land use will be reclaimed immediately after they are no longer needed for mining and reclamation operations. Roads that are not listed as postmining roads in this section, will be closed to traffic~~;~~, and all bridges and culverts removed. Prior to reclamation, surface material that is incompatible with the postmining land use and revegetation requirements will be removed from the roads and properly disposed of at the mine site. The main haul road roadbeds will be scarified or ripped to break up the surface. Topsoil will be replaced on the roadbed and the surface revegetated in accordance with the standards set forth in R645. The portal access/haul road is in Pit 10 and will be backfilled when no longer needed.

  Roads that will remain postmining are the following:
  - Road to Water Well with details shown on Drawing 5-22D
  - Road to east C. Burton Pugh property (K3993) with details shown on Drawing 5-22C
  - County Road 136 (K3900) with details on Drawing 5-22E, 5-22F and 5-22G. This County road will be reconstructed within the permit area by Kane County. This reconstruction will occur concurrently with the final

stage of reclamation as scheduled on Drawing 5-38 and is expected to be completed by 2017.

- Road to Swapp Ranch (same specification as the Water Well Road)

The location of these roads is shown on Drawings 5-35 and 5-37 along with the post mining topography.

- Removal of Water Control Structures. All sedimentation control structures, including ditches, berms and sedimentation ponds not retained as part of the approved post-mining land use will be removed, the areas regraded, topsoiled, and revegetated. All water control structures will be removed at final reclamation.

Final pit backfilling, removal of buildings, roads and other facilities, along with replacement of topsoil is expected to require approximately 15 months after the last coal is removed. In the alternate reclamation scenario (Drawing 5-37), the bulk of this period will be required to backfill the final pits.

542.700. Final Abandonment of Mine Openings and Disposal Areas.

Final abandonment of alternative mined highwall panels will be at the time when completed panels are backfilled as described in Section 529.

Underground mine openings will be closed in accordance with R645-301-513, R645-301-529, R645-301-551 and approved MSHA requirements and backfilled.

When no longer needed for monitoring or other use approved by the Division upon a finding of no adverse environmental or health and safety effects, or unless approved for transfer as a water well under R645-301-731.100 through R645-301-731.522 and R645-301-731.800, each well will be capped, sealed, backfilled, or otherwise properly managed, as required by the Division in accordance with R645-301-529.400, R645-301-631.100, and R645-301-748. Permanent closure measures will be designed to prevent access to the mine workings by people, livestock, fish and wildlife, machinery and to keep acid or other toxic drainage from entering ground or surface waters.

If a water well is exposed by coal mining and reclamation operations, it will be permanently closed unless otherwise managed in a manner approved by the Division.

Permanent closure and abandonment of water wells greater than 30 feet in depth will be in accordance with the requirements of "Administrative Rules for Water Well Drillers", State of Utah, Division of Water Rights or other applicable state regulations. Abandonment of wells will be performed by a licensed water well driller. The wells to be abandoned will be completely filled using neat cement grout, sand cement grout, unhydrated bentonite, or bentonite grout, or other materials approved by the Utah State Engineer's office. Alternatively, the well may be abandoned using a different procedure upon approval from the Utah State Engineer's office.

Abandonment materials will be introduced at the bottom of the well or required sealing interval and placed progressively upward to the top of the well. The casing will be severed a minimum of 2 feet below the ground surface. A minimum of 2 feet of compacted native material will be placed above the abandoned well upon completion.

Within 30 days of the completion of well abandonment procedures, a report will be submitted to the State Engineer by the responsible licensed driller giving data related to the abandonment of the well. This shall include the name of the licensed driller or other person(s) performing abandonment procedures, name of well owner at the time of abandonment, the address or location of the well by section, township, and range, abandonment materials and equipment used, water right or file number covering the well, the final disposition of the well, and the date of completion.

Exploration holes and boreholes will be backfilled, plugged, cased, capped, sealed, or otherwise managed to prevent acid or toxic contamination of water resources and to minimize disturbance to the prevailing hydrologic balance. Exploration holes and boreholes will be managed to ensure the safety of people, livestock, fish and wildlife, and machinery.

If a water well is exposed by coal mining and reclamation operations, it will be permanently closed unless otherwise managed in a manner approved by the Division.

If any exploration boreholes are to be used as monitoring wells or water wells, these will meet the provisions of R645-301-731

Boreholes will be backfilled to within 1 foot of the land surface with concrete or other materials approved by the Division as necessary to prevent contamination of groundwater or surface-water resources or to protect the prevailing hydrologic balance. The upper approximately 1 foot will be backfilled with native materials to facilitate reclamation (see Drawing 6-11). Exploration holes and boreholes that may be uncovered during mining and reclamation activities will be permanently closed unless approved for water monitoring or otherwise managed in a manner approved by the Division.

542.720. Disposal of Excess Spoil.

A geotechnical analysis has been completed for the proposed excess spoil structure. This analysis estimates the long-term safety factor to be 1.6 to 1.7 based on the proposed design. Following proper construction practices of building the structure in maximum four foot lifts and meeting 85% compaction based on the standard Procter will ensure that the structure will be stable under all conditions of construction. This construction will occur only in the designated excess spoil area as shown on Drawing 5-3 and 5-35. The fill will be placed with end dump haul trucks and lifts will be constructed using dozers. High precision GPS systems will be regularly utilized to check grades and appropriate lift thickness. The geotechnical analysis for this structure can be viewed in Appendix 5-1.

Excess spoil that is combustible will be adequately covered with noncombustible material to prevent sustained combustion.

542.730. Disposal of Coal Mine Waste.

The MRP does not contemplate processing of coal that would produce coal mine waste.

542.740. Disposal of Noncoal Mine Wastes.

Noncoal mine waste including, but not limited to grease, lubricants, paints, flammable liquids, garbage, abandoned mining machinery, lumber and other combustible materials generated during mining activities will be placed and temporarily stored in a controlled manner in a designated portion of the permit area and hauled offsite to a state approved recycling or solid waste disposal site. Final disposal of noncoal mine waste will not take place within the permit area. With the exception of removal of perforated piping used in the construction of Alluvial Ground Water Drains that will be left in place as mining advances. This perforated piping will be covered in place approximately 20' to 30' below the final reclaimed surface. All other waste materials (ie. metal culvert) associated with the Alluvial Ground Water Drains will be removed and disposed of in a State-approved solid waste disposal site.

542.800. Reclamation Cost.

The amount of the bond will depend upon the requirements of the ***approved*** permit and reclamation plan (R645-830.120).

A preliminary estimate of reclamation costs is included in Appendix 8-1. This estimate is based upon the proposed plan of open pit, highwall and underground mining. ~~The cost for the alternative plan of highwall mining will be considerably less because of reduced surface disturbance with this mining operation. Therefore the cost estimate will remain based on the proposed plan of open pit mining.~~ A final bond estimate will be provided by the applicant to the Division upon completion of the approved permit and reclamation plan.

550. RECLAMATION DESIGN CRITERIA AND PLANS

551. SEALING AND CASING OF UNDERGROUND OPENINGS

When no longer required, underground mine openings will be closed in accordance with R645-301-513, R645-301-529, R645-301-551 and MSHA approved requirements and backfilled. When no longer needed for monitoring or other use approved by the Division upon a finding of no adverse environmental or health and safety effects, or unless approved for transfer as a water well under R645-301-731.100 through R645-301-731.522 and R645-301-731.800, each well will be capped, sealed, backfilled, or otherwise properly managed, as required by the Division in accordance with R645-301-529.400, R645-301-631.100, and R645-301-748. Permanent closure measures will be designed to prevent access to the mine workings by people, livestock, fish and wildlife, machinery and to keep acid or other toxic drainage from entering ground or surface waters.

If a water well is exposed by coal mining and reclamation operations, it will be permanently closed unless otherwise managed in a manner approved by the Division.

Permanent closure and abandonment of water wells greater than 30 feet in depth will be in accordance with the requirements of "Administrative Rules for Water Well Drillers", State of Utah, Division of Water Rights or other applicable state regulations. Abandonment of wells will be performed by a licensed water well driller. The wells to be abandoned will be completely filled using neat cement grout, sand cement grout, unhydrated bentonite, or bentonite grout, or other materials approved by the Utah State Engineer's office. Alternatively, the well may be abandoned using a different procedure upon approval from the Utah State Engineer's office.

Abandonment materials will be introduced at the bottom of the well or required sealing interval and placed progressively upward to the top of the well. The casing will be severed a minimum of 2 feet below the ground surface. A minimum of 2 feet of compacted native material will be placed above the abandoned well upon completion.

Within 30 days of the completion of well abandonment procedures, a report will be submitted to the State Engineer by the responsible licensed driller giving data related to the abandonment of the well. This shall include the name of the licensed driller or other person(s) performing abandonment procedures, name of well owner at the time of abandonment, the address or location of the well by section, township, and range, abandonment materials and equipment used, water right or file number covering the well, the final disposition of the well, and the date of completion.

Exploration holes and boreholes will be backfilled, plugged, cased, capped, sealed, or otherwise managed to prevent acid or toxic contamination of water resources and to minimize disturbance to the prevailing hydrologic balance. Exploration holes and boreholes will be managed to ensure the safety of people, livestock, fish and wildlife, and machinery.

If a water well is exposed by coal mining and reclamation operations, it will be permanently closed unless otherwise managed in a manner approved by the Division.
If any exploration boreholes are to be used as monitoring wells or water wells, these will meet the provisions of R645-301-731

Boreholes will be backfilled to within 1 foot of the land surface with concrete or other materials approved by the Division as necessary to prevent contamination of groundwater or surface-water resources or to protect the prevailing hydrologic balance. The upper approximately 1 foot will be backfilled with native materials to facilitate reclamation (see Drawing 6-11). Exploration holes and boreholes that may be uncovered during mining and reclamation activities will be permanently closed unless approved for water monitoring or otherwise managed in a manner approved by the Division.

552. **PERMANENT FEATURES**.

552.100

Small depressions may be constructed if they are needed to retain moisture, minimize erosion, create and enhance wildlife habitat, or assist revegetation.

552.200

All impoundments will be reclaimed, no permanent impoundments are proposed.

553 **BACKFILLING AND GRADING:**

~~Backfilling and Grading of the mined area will proceed in conjunction with coal recovery operations.~~

~~The planned mine will recover approximately 4.64 million tons of coal, and remove approximately 30.1 million Bank Cubic Yards (BCY) of overburden. The following is a description of the overburden removal and backfilling process:~~

~~Based on the overburden isopach map (Drawing 5-15), the overburden removal and backfilling process has been separated into three major stages. The first stage of this process is for the initial mining area, Pits 1-8. These pits have a relatively low strip ratio, approximately 5:1 (refer to Drawing 5-13). In order to efficiently remove overburden for this phase, spoil from the first three pits will be placed in an excess spoil area located immediately west of Pit 1. This excess spoil structure will hold approximately 2.7 million loose cubic yards (LCY) of material and is shown on Drawing 5-17. Once the excess spoil pile is filled, overburden from the next 4 pits can then be used as pit backfill as the mining progresses through Pit 8. The completion of this phase is shown on Drawing 5-17.~~

~~Phase 2 requires mining to occur in two areas of the permit alternately. As mining progresses through Pits 9-13, the isopach (Drawing 5-15) shows that the overburden significantly increases. This increase and the shape of the mining boundary for the Permit Area require a fill above approximate original contour that is an extension of the excess spoil pile. Material from Pits 9-13 significantly exceeds the backfill capacity available from the preceding pits (Pits 1-8). The fill above approximate original contour blends in with the excess spoil structure from Phase 1 and extends an additional 2,000 feet to the east as the mining sequence proceeds to Pit 15.~~

~~Also, mining begins with Pit 28 and proceeds alternately with Pits 9-13, north to Pit 23. The isopach shows that Pits 28-23 have a relatively low strip ratio, approximately 4.2:1 increasing to 4.9:1 respectively. Overburden from Pit 28 will all be hauled to the excess spoil structure, with overburden from the successive pits to north back filling the previously mined. In this stage, the fill above original contour is approximately 5.8 million LCY. Drawing 5-18 (Stage 2) shows the details of this stage of the overburden removal and resulting landform.~~

~~Phase 3 overburden removal begins in Pit 14 and proceeds alternately with Pit 22 coming from the south to meet at Pit 18, the last pit to be mined. During this stage, the strip ratio reduces significantly from Stage 2 as mining progresses to Pit 18. As the strip ratio reduces to the south,~~

~~significant backfill capacity is available in the preceding Pit 15. This results in the distance between the backfill and the active coal face increasing because there is a lack of spoil in the lower ratio pits as mining proceeds south to fill the preceding higher ratio area. At the end of mining this phase, an area will not be completely backfilled that is approximately 1,600 feet in length and 875 feet wide and will require 3.3 million yards of fill to complete reclamation to approximate original contour. This remaining pit provides an open pit adjacent to the federal coal reserves for backfilling of overburden so that a smooth transition can be made without developing another boxcut and an excess spoil area. The backfill configuration at the end of this stage is shown in Drawing 5-19.~~

~~The proposed plan (Preferred Scenario) for backfilling the final pits is based on the assumption that Alton Coal Development, LLC will be successful with acquiring the adjacent federal coal reserves, located immediately to the west of the project area. This Preferred scenario for backfilling will minimize overall disturbance, and maximize resource recovery by providing a transition into the adjacent federal reserves with minimal effect to existing reclamation and backfill in the Permit Area. This scenario will also minimize variances from approximate original contour on the federal lands by eliminating the need for an excess spoil structure from the initial box cut as operations are transitioned into these reserves. In addition, this scenario provides a method for implementing concurrent reclamation during the project by eliminating temporary stockpiles of spoil that can not be reclaimed and have to be placed in backfilled areas at a later time. Use of temporary spoil stockpiles significantly delay reclamation and this plan eliminates the need for these type of temporary structures.~~

~~At the time that the transition occurs into the federal reserves, overburden will be removed from the federal reserves and placed in the final pits to approximate original contour. This final landform can be viewed on Drawings 5-35 and 5-36.~~

~~The following is an overburden and backfill balance for this scenario:~~

~~Preferred Scenario (Adjacent Federal Reserves Acquired)~~				
~~Phase~~	~~Overburden (LCY)~~	~~Available Backfill (LCY)~~	~~Excess Spoil (LCY)~~	~~Total Excess Spoil (LCY)~~
~~1~~	~~7,936,000~~	~~5,195,000~~	~~2,741,000~~	~~2,741,000~~
~~2~~	~~14,168,000~~	~~11,127,000~~	~~3,041,000~~	~~5,782,000~~
~~3~~	~~14,631,000~~	~~14,631,000~~	~~0~~	~~5,782,000~~
~~4 (Federal)~~	~~2,545,000~~	~~2,545,000~~	~~0~~	~~5,782,000~~
~~Total~~	~~39,280,000~~	~~33,498,000~~	~~5,782,000~~	~~5,782,000~~

~~*Loose Cubic Yards is estimated based on an overall 22% swell factor (Caterpillar Performance Handbook)~~

~~In the case that Alton Coal Development is not successful with acquiring the adjacent federal coal reserves, an alternate scenario has been developed. The Alternate scenario requires that all fill above approximate original contour and part of the excess spoil structure will be rehandled and placed in the remaining backfill area. The final landform for this scenario is shown on Drawing 5-37. This step requires rehandle of approximately 2.5 million yards of spoil. In this scenario, reclamation of the project area will be~~

~~significantly delayed and the transition into adjacent federal coal reserves at a later date will disturb additional backfill along the west permit boundary approximately 2,000 feet in length by 230 feet wide (10 acres). An additional excess spoil structure would then need to be constructed on the federal lands to place spoil from the initial boxcut. Part of the excess spoil would likely be material removed from the Permit Area to access the coal beneath the Permit Area highwalls and provide the proper layback of the backfill material along the Permit boundary.~~

~~If the alternative highwall mining is selected, highwall mining would begin in Pit 9.Then, once coal is removed from Pit 22, the coal east of Pits 22 and 23 will be mined using the highwall miner while Highwall Trench 1 (HWT1) is excavated. In this method of mining, an unmanned cutter module is driven underground and operated in front of the highwall. The highwall mining machine stands on the pit floor or on a bench, directly in front of the exposed seam and makes long parallel rectangular drives into the coal seam. A remote-operated cutter module is pushed into the seam by a string of push beams (unmanned coal-conveying elements) that transport the mined coal back to the entry of the drive onto a stockpile. Coal is then removed to the sizing/loading area. The miner is moved along the face making successive pushes into the coal face. Once coal is removed from the Pits/Highwall Trench, overburden from excavation of the next Highwall Trench is used to backfilled the mined out area continuing with the progression of the trench.~~

~~The anticipated coal removal sequence for the Highwall mining is shown on drawing 5-10A. As is depicted, each Pit/Highwall Trench consists of Panels, each panel consisting of 10 holes. The spacing between the holes and the spacing between the panels are dictated by the amount of overburden over the panels. The alternate Highwall mining is designed such that subsidence does not occur to the surface with nonyieldable webs and barriers. Specific information concerning these design are found in Appendix 5-8. Highwall mining will have only the disturbance associated with the pit/trench for placement of the highwall miner and will have no impact on the surface above the highwall panels.~~

~~The following tables summarizes the overburden and backfill balance for these two scenarios:~~

~~Alternate Scenario (Adjacent Federal Reserves Not Acquired)~~				
~~Phase~~	~~Overburden (LCY)~~	~~Available Backfill (LCY)~~	~~Excess Spoil (LCY)~~	~~Total Excess Spoil (LCY)~~
~~1~~	~~7,936,000~~	~~5,195,000~~	~~2,741,000~~	~~2,741,000~~
~~2~~	~~14,168,000~~	~~11,127,000~~	~~3,041,000~~	~~5,782,000~~
~~3~~	~~14,631,000~~	~~14,631,000~~	~~0~~	~~5,782,000~~
~~4 (Rehandle)~~	~~0~~	~~2,545,000~~	~~-2,545,000~~	~~3,237,000~~

~~Total~~	~~36,735,000~~	~~33,498,000~~	~~3,237,000~~	~~3,237,000~~

~~Alternate Scenario (Highwall mining)~~				
~~Phase~~	~~Overburden (LCY)~~	~~Available Backfill (LCY)~~	~~Excess Spoil (LCY)~~	~~Total Excess Spoil (LCY)~~
~~1~~	~~7,936,000~~	~~5,195,000~~	~~2,741,000~~	~~2,741,000~~
~~2~~	~~7,381,000~~	~~7,277,000~~	~~104,000~~	~~2,845,000~~
~~3~~	~~5,257,000~~	~~5,257,000~~	~~0~~	~~2,845,000~~
~~4 (Federal)~~	~~2,545,000~~	~~2,545,000~~	~~0~~	~~2,845,000~~
~~Total~~	~~23,119,000~~	~~20,274,000~~	~~2,845,000~~	~~2,845,000~~

~~In both scenarios (Preferred and Alternate), Rough backfilling and grading operations will follow coal removal by not more than 60 days or 1500 linear feet except for the exemption Pit 9. Pit 9 will be utilized for access to the Highwall Trench. Once mining is complete, the proposed plan for backfilling Pit 9 includes acquiring the right to mine the adjacent federal coal reserves, located immediately southwest or north of Pit 9. In the case that Alton Coal Development is not successful with acquiring the adjacent federal coal reserves, all the fill above approximate original contour and part of the excess spoil structure will be rehandled and placed back in the remaining backfill area.~~

~~Major steps in the backfilling and grading process are:~~

- ~~Backfilling of the Mined Out Pit. Material from active pits will be used to backfill mined out pits as mining progresses. Material will be placed in the in-pit backfill in lifts, until the approximate planned final elevation is reached. Working stability in the backfill will be achieved by placement of the material, and control of the overall spoil face slope at stable angles. The mined out area will be filled to its planned post-mining elevation, which approximates the pre-mining land contour. The backfill will be inherently stable because the exposed surface will have shallow slopes, and the backfill surface will not be significantly higher than the surrounding undisturbed ground with the exception of the variance shown on Drawing 5-3.~~
- ~~Backfilling of Ramps. Ramps and travelways within the active mining will be moved as necessary for safe operation and efficient hauling of overburden and coal. When a particular ramp or travelway is no longer needed, it will be backfilled with excavated overburden from the advancing pit.~~
- ~~Grading. After backfilling is complete in each mined out area, the area will be graded using dozers and motor graders to achieve the planned post-mining contour, facilitate stable positive drainage patterns, and to blend in with the surrounding topography. Postmining slopes will not exceed either the angle of repose or such lesser slope as is necessary to achieve a minimum long-term static~~

~~safety factor of 1.3 and prevent slides. A geotechnical analysis has been completed for the excess spoil structure and can be found in Appendix 5-1.~~

~~Timing of backfilling and grading operations will depend on the rate of mine advance and the availability of backfill space and material. It is planned that mined areas will be backfilled and graded within approximately 60 days following coal removal, or 1,500 feet of the active coal removal face. As described in the previous text and shown on Drawing 5-19, there will be a variance from this standard in the final pits. Areas needed for in-pit roads, ramps, drainage controls or areas which must be left open temporarily for operational reasons will be backfilled and graded as they become available.~~

~~In the initial mining area, pits 1 through 8 (spoil from pit 2 and 3 will be permanently placed in the excess spoil area and pit 1. Part of Pit 3 is placed in the previous pit. All of the 4th pit is placed in the pit 3, beginning the sequential pit backfilling process. By the time coal recovery is complete, rough backfilling and grading will be complete through 7 pits. Rough backfilling and grading will continue and be completed through pit 8.~~
~~Pits 1, 2, and 3 are defined on drawing 5-10. Pits 4 through 8 will be determined during the mining of pits 1, 2, and 3. At that time, an amendment to this permit reflecting the number and sequence of pits 4 through 8 will be submitted to the division.~~
Backfilling and Grading of the mined area will proceed in conjunction with coal recovery operations.

The planned mine will recover approximately 3.05 million tons of coal, and remove approximately 16.1 million Bank Cubic Yards (BCY) of overburden. The following is a description of the overburden removal and backfilling process:

Based on the overburden isopach map (Drawing 5-15), the overburden removal and backfilling process has been separated into three major stages. The first stage of this process is for the initial mining area, Pits 1-9. These pits have a relatively low strip ratio, approximately 4:3 (refer to Drawing 5-13). In order to efficiently remove overburden for this phase, spoil from the first three pits will be placed in an excess spoil area located immediately west of Pit 1. This excess spoil structure will hold approximately 2.7 million loose cubic yards (LCY) of material. Once the excess spoil pile is filled, overburden from the next 4 pits can then be used as pit backfill as the mining progresses through Pit 9. Pit 9 will not be backfilled at this stage; it has been left open for placement of the highwall miner to recover coal from panels 1-3.

From the initial mining area, operations will proceed from the southeast ¼ of Section 30, beginning with pit 28 and proceeding north to pit 22. Material from pit 28 was place in the excess spoil structure with overburden material from successive pits to the north being placed in the mined out pit to the south. These pits were not mined as initially laid out due to the coal being eroded in the eastern half of pit 28 and numerous sand channels replacing much of the coal in the eastern portions of pit 22-27. These pits as mined, have a relatively low strip ratio of approximately 5.0:2. While overburden removal was occurring in pit 22, coal recovery was occurring from the pit 9 highwall panels. In hole 27 of Pit 9 Panel 3, the highwall miner head became lodged. Another head was leased in order to continue highwall mining from pits 22 and 23 while a recover plan was approved to mine Pit 10 and recover the lodged miner head.

In Stage three, Pit 21 was then mined along with the highwall panels in 21, then Pit10. The strip ratio for these two pits was 8.0 and 12.1 respectively. Overburden was placed in the pits to the south from pit 21 and in pit 9 from pit 10. Pit 10 will remain open for development of the underground portals and remain open until all underground coal is mined. There will be no additional overburden removal associated with the underground mining. Surface mining will continue with mining of Highwall Trench (HWT) 1 continuing south to HWT 3. The strip ratio for the highwall trench is 10.3:1. Overburden from HWT 1 will fill the remaining pit 9 with material from HWT 2 and 3 filling the previously mined portions of highwall trench. The remaining trench provides an open pit near the federal coal reserves for backfilling of overburden so that a smooth transition can be made without developing another excess spoil area.

The proposed plan (Preferred Scenario) for backfilling the final pits is based on the assumption that Alton Coal Development, LLC will be successful with acquiring the adjacent federal coal reserves, located to the south, west and north of the project area. This Preferred scenario for backfilling will minimize overall disturbance, and maximize resource recovery by providing a transition into the adjacent federal reserves with minimal effect to existing reclamation and backfill in the Permit Area. This scenario will also minimize variances from approximate original contour on the federal lands by eliminating the need for an excess spoil structure from the initial box cut as operations are transitioned into these reserves. In addition, this scenario provides a method for implementing concurrent reclamation during the project by reducing temporary stockpiles of spoil that cannot be reclaimed and have to be placed in backfilled areas at a later time.

At the time that the transition occurs into the federal reserves, overburden will be removed from the federal reserves and placed in the final pits to approximate original contour. This final landform can be viewed on Drawings 5-35 and 5-36.

The following is an overburden and backfill balance for this scenario:

Preferred Scenario (Adjacent Federal Reserves Acquired)				
Stage	Overburden (LCY)	Available Backfill (LCY)	Excess Spoil (LCY)	Total Excess Spoil (LCY)
1	7,936,000	5,195,000	2,741,000	2,741,000
2	7,381,000	7,277,000	104,000	2,845,000
3	5,257,000	5,257,000	0	2,845,000
4 (Federal)	2,545,000	2,545,000	0	2,845,000
Total	23,119,000	20,274,000	2,845,000	2,845,000

*Loose Cubic Yards is estimated based on an overall 22% swell factor (Caterpillar Performance Handbook)

In the case that Alton Coal Development is not successful with acquiring the adjacent federal coal reserves, an alternate scenario has been developed. The Alternate scenario requires that all fill above approximate original contour and part of the excess spoil structure will be rehandled and placed in the remaining backfill area. The final landform for this scenario is shown on Drawing 5-37. This step requires rehandle of approximately 2.5 million yards of spoil. An additional excess spoil structure would then need to be constructed on the federal lands to place spoil from the initial boxcut. Part of the excess spoil would likely be material removed from the Permit Area to access the coal beneath the Permit Area highwalls and provide the proper layback of the backfill material along the Permit boundary.

The following table summarizes the overburden and backfill balance for this scenario:

Alternate Scenario (Adjacent Federal Reserve's Not Acquired)				
Phase	Overburden (LCY)	Available Backfill (LCY)	Excess Spoil (LCY)	Total Excess Spoil (LCY)
1	7,936,000	5,195,000	2,741,000	2,741,000
2	7,381,000	7,277,000	104,000	2,845,000
3	5,257,000	5,257,000	0	2,845,000
4 (Rehandle)	0	2,545,000	-2,545,000	300,000
Total	20,574,000	20,274,000	300,000	300,000

In both scenarios (Preferred and Alternate), Rough backfilling and grading operations will follow coal removal by not more than 60 days or 1500 linear feet except for the exemption Pit 9. Pit 9 will be utilized for access to the Highwall Trench. Also, pit 10 will remain open until removal of underground coal is complete. Once mining is complete, the proposed plan for backfilling Highwall Trench 3 includes acquiring the right to mine the adjacent federal coal reserves, located immediately federal coal east of pit 6. Also, some of the federal coal reserves can be accessed through the underground portals located in Pit 10. In the case that Alton Coal Development is not successful with acquiring the adjacent federal coal reserves, all the fill above approximate original contour and part of the excess spoil structure will be rehandled and placed back in the remaining backfill area.

Major steps in the backfilling and grading process are:

- Backfilling of the Mined Out Pit. Material from active pits will be used to backfill mined out pits as mining progresses. Material will be placed in the in-pit backfill in lifts, until the approximate planned final elevation is reached. Working stability in the backfill will be achieved by placement of the material, and control of the overall spoil face slope at stable angles. The mined out area will be filled to its planned post-mining elevation, which approximates the pre-mining land contour. The backfill will be inherently stable because the exposed surface will have shallow slopes, and the backfill surface will not be significantly higher than the surrounding undisturbed ground with the exception of the variance shown on Drawing 5-3.
- Backfilling of Ramps. Ramps and travelways within the active mining will be moved as necessary for safe operation and efficient hauling of overburden and

coal. When a particular ramp or travelway is no longer needed, it will be backfilled with excavated overburden from the advancing pit.

- Grading. After backfilling is complete in each mined out area, the area will be graded using dozers and motor graders to achieve the planned post-mining contour, facilitate stable positive drainage patterns, and to blend in with the surrounding topography. Postmining slopes will not exceed either the angle of repose or such lesser slope as is necessary to achieve a minimum long-term static safety factor of 1.3 and prevent slides. A geotechnical analysis has been completed for the excess spoil structure and can be found in Appendix 5-1.

Timing of backfilling and grading operations will depend on the rate of mine advance and the availability of backfill space and material. It is planned that mined areas will be backfilled and graded within approximately 60 days following coal removal, or 1,500 feet of the active coal removal face. As described in the previous text and shown on Drawing 5-19, there will be a variance from this standard in the final pits. Areas needed for in-pit roads, ramps, drainage controls or areas which must be left open temporarily for operational reasons will be backfilled and graded as they become available.

553.110

All areas except for the excess spoil pile and the variance from AOC (approximately 85 acres), will be restored to approximate original contour as shown on Drawing 5-35. R645-301-553.800 (Thick Overburden) does apply to this surface mine. In areas where excess spoil and variance from approximate original contour occur, the slopes will be regraded to a maximum angle of 3h:1v and most slopes are flatter as shown on Drawing 5-35 and 5-36. A geotechnical analysis has been completed to verify that the spoil material will be stable long term. This analysis can be viewed in Appendix 5-1.

553.120

All highwalls will be eliminated in the final landform. Small depressions may be constructed as needed to retain moisture, minimize erosion, create and enhance wildlife habitat or assist vegetation. All spoil piles will be eliminated with the exception of the planned excess spoil and variance from original contour as shown on Drawing 5-35.

553.130

Postmining slopes will not exceed the angle of repose which is expected to be approximately 1.5h:1v as described in Appendix 5-5. This appendix is an analysis by Dr. Ben Seegmiller addressing the safety factor for the post mining slope with the lowest safety factor outside the excess spoil area. This analysis concludes that a minimum safety factor of these slopes will be 1.7 which exceeds the requirement of 1.3. The excess spoil slopes have been analyzed by Alan Taylor, P.E., an expert in geotechnical engineering. These slopes also significantly exceed the required 1.3 safety factor. Details for this analysis by Mr. Taylor can be viewed in Appendix 5-1.

553.140

Slopes will be regraded and vegetated to minimize erosion and water pollution on and off the site.

553.150
Backfilling and grading will be conducted to support the approved post mining land use.

553.200 Spoil and Waste.

Spoil located in the excess spoil area and the variance from approximate original contour will be compacted to 85% of the standard Procter to provide long term stability of these structures. Remaining backfill in mined out areas will be confined and regraded to approximate original contour and will therefore not require compaction for long term stability. Subsoil will be placed over spoils and waste prior to placement of topsoil. This subsoil layer will provide a covering with minimal infiltration rate to prevent leaching of toxic materials.

553.210

Excess spoil from surface mining activities will be disposed of according to R645-301-211, R645-301-212, R645-301-412.300, R645-301-512.210, R645-528.310, R645-301-535.100 through R645-301-535.130, R645-301-535.300 through R645-301-535.500, R645-536.300, R645-301-542.720, R645-301-553.240, R645-301-745.100, R645-301-745.100, R645-301-745.300, and R645-301-745.400. Detail for meeting these standards can be reviewed in the corresponding sections.

553.220

The MRP does not contemplate placing spoil on areas outside the mined-out surface area for the purposes of restoring the approximate original contour.

553.300. Covering of Exposed Coal Seams, and Acid- and Toxic-Forming Materials.

Exposed coal seams, acid- and toxic-forming materials, and combustible materials exposed, used, or produced during mining will be adequately covered with nontoxic and noncombustible materials, or treated, to control the impact on surface and ground water in accordance with R645-301-731.100 through R645-301-731.522 and R645-301-731.800, to prevent sustained combustion, and to minimize adverse effects on plant growth and on the approved postmining land use.

553.400. Cut and Fill Terraces

The MRP does not contemplate constructing cut and fill terraces.

553.500. Previously Mined Areas (PMA's) and Continuously Mined Areas (CMA's).

The MRP does not contemplate operations associated with PMA’s, CMA’s, or areas with remaining highwalls.

553.600. Highwall Management

The MRP does not contemplate operations associated with PMA's, CMA's, or areas with remaining highwalls.

553.700. Backfilling and Grading: Thin Overburden.

The Coal Hollow project is expected to have approximately 1.8 million loose cubic yards of excess spoil; therefore R645-301-800 applies rather than R645-301-553.700.

553.800. Backfilling and Grading: Thick Overburden.

553.810

The spoil will be placed to attain the lowest practicable grade, and will not exceed the angle of repose for the material. ~~A sequence of the steps for practicable movement of the excess spoil is shown on Drawings 5-17 through 5-19.~~ The slopes on the excess spoil and variance from the approximate original contour will not exceed 3h:1v or flatter, which will provide a long-term, stable structure. The general design of the tall (60'+ vertically) excess spoil slopes is 5h:1v to 4h:1v to 3h:1v, bottom to top. This design creates a concave shape slope that resembles naturally occurring hills in the area and will minimize erosion. In addition, irregularities (flatter areas) have been added to break up long slopes. The overall shape of the pile is also irregular to be similar to hills in the surrounding area. The final configuration of this excess spoil can be viewed in Drawings 5-35 and 5-36. The rough grading of the excess spoil outlsopes will follow by not more than 60 days after completed construction. The angle of repose for the spoil material is expected to be 1.5h:1v as provided in Appendix 5-5 in the Introductory Overview (page 1) by Dr. Ben Seegmiller, an expert in the field of rock mechanics and slope stability. The design slopes are significantly flatter than the angle of repose expected for the spoil.

553.820 - 553.830

Backfilling and Grading of thick overburden will meet the following requirements:

- *R645-301-211: The applicant will present a description of the premining soil resources as specified under R645-301-221. Topsoil and subsoil to be saved under R645-301-232 will be separately removed and segregated from other material.*

  The soil resources for the proposed excess spoil disposal area are described in 2-1. A plan has been developed for removal of topsoil and suitable subsoil based on the soil descriptions in this appendices. The handling plan can be viewed on Drawing 2-2. Topsoil and acceptable subsoil will be separately removed and segregated from other material prior to placement of any spoil.

- *R645-301-212: After removal, topsoil will be immediately redistributed in accordance with R645-301-242, stockpiled pending redistribution under R645-301-234, or if demonstrated that an alternative procedure will provide equal or more protection for the topsoil, the Division may, on a case-by case basis, approve an alternative;*

  Excess spoil will have topsoil and subsoil redistributed in an approximately uniform, stable thickness with the approved post mining land use, contours and surface water drainage systems. Material handling practices will prevent excess compaction of these materials. Handling practices will also protect the materials from wind and water erosion before and after seeding and planting.

- *R645-301-412.300: Criteria for Alternative Postmining Land Uses.*

  Not Applicable

- *R645-301-512.210: Excess Spoil. The professional engineer experienced in the design of earth and rock fills will certify the design according to R645-301-535.100.*

  A professional engineer experienced in the design of earth and rock fills with assistance from a geotechnical expert has certified the design according to R645-301-535.100. These certifications can be viewed on Drawings 5-35, 5-36 and 5-17 through 5-19.

- *R645-301-512.220: Durable Rock Fills*

  No durable rock fills are planned.

- *R645-301-514.100: Excess Spoil. The professional engineer or specialist will be experienced in the construction of earth and rock fills and will periodically inspect the fill during construction. Regular inspections will also be conducted during placement and compaction of fill materials.*

  A professional engineer or specialist that is experienced in the construction of earth and rock fills will inspect the fill during construction and regular inspections will also be conducted during placement and compaction of fill materials.

- *R645-301-528.310: Excess spoil will be placed in designated disposal areas within the permit areas within the permit area, in a controllable manner to ensure mass stability and prevent mass movement during and after construction. Excess spoil will meet the design criteria of R645-301-535. For the purposes of SURFACE COAL MINING AND RECLAMATION ACTIVITIES, the permit application must include a description of the proposed disposal site and the design of the spoil disposal structures according to R645-301-211, R645-301-212, R645-301-412.300, R645-301-512.210, R645-528.310, R645-301-535.100* *through R645-301-535.130, R645-301-535.300 through R645-301-535.500, R645-536.300, R645-301-542.720, R645-301-553.240, R645-301-745.100, R645-301-745.100, R645-301-745.300, and R645-301-745.400.*

Excess spoil will be placed in the area designated on Drawing 5-3 and 5-35. This fill will be placed in lifts not to exceed 4 feet. The material will be transported from the overburden removal area to the fill by end dump haul trucks and a dozer(s) will spread the spoil to this lift thickness. The fill will meet at minimum 85% compaction as related to the standard Procter. Final slopes will be regraded to a maximum slope of 3h:1v. The top of the fill will sloped to approximately 2% to prevent pooling of water and to reestablish drainage similar to the original flow patterns. The excess spoil placed on the non-mined areas is approximately 32 acres and varies in height from 35 to 110 feet. The area of excess fill over mined out areas (variance from approximate original contour) is an extension of the fill placed on the non-mined area and is approximately 55 acres. Combined acreage of the excess fill placed on mined and non-mined areas is 87 acres and varies in height from 60 to 100 feet above original contour. Total excess fill is 8.6 million yards. Design of this fill can be viewed in Drawings 5-35 through 5-36 and the geotechnical study can be viewed in Appendix 5-1.

- *R645-301-535.100 through R645-301-130: Disposal of Excess Spoil*

  A geotechnical analysis of the excess spoil structure design has been completed by an expert in this field. The long term static safety factor for this structure design is estimated at 1.6 to 1.7. Lifts will be placed in thicknesses not to exceed 4 feet. The lifts will meet 85% compaction by the standard Procter. The fill will be graded to allow for drainage similar to original patterns and to prevent excessive infiltration of water. Fill will be covered with subsoil and topsoil as specified in Chapter 2 to provide conditions suitable for revegetation of the area. The geotechnical study can be viewed in Appendix A5-1.

- *R645-301-535.300 through R645-301-535.500: Disposal of Excess - Spoil Durable Rock Fills.*

  Not Applicable

- *R645-301-536.300: Disposal of Coal Mine Waste in Excess Spoil*

  No coal mine waste is planned in the excess spoil area.

- *R645-301-542.720: Excess spoil will be placed in designated disposal areas within the permit area, in a controlled manner to ensure that the final fill is suitable for reclamation and revegetation compatible with the natural surroundings and the approved postmining land use. Excess spoil that is combustible will be adequately covered with noncombustible material to prevent* *sustained combustion. The reclamation of excess spoil will comply with the design criteria under R645-301-553.240.*

The excess spoil as shown in Drawing 5-35 and 5-36 will be suitable to the surrounding area and for the postmining land use of primarily grazing. No combustible excess spoil will be placed in the proposed structure. The reclamation of the spoil does not include any terraces and the slopes will not exceed 3h:1v.

- *R645-301-553.240: The final fill configuration of the fill (excess spoil) will be suitable for the approved postmining land use. Terraces may be constructed on the outslope of the fill if required for stability, control of erosion, to conserve soil moisture, or to facilitate the approved postmining land use. The grade of the outslope between terrace benches will not be steeper than 2h:1v (50 percent).*

The excess spoil as shown in Drawings 5-35 and 5-36 will be suitable to the surrounding area and for the postmining land use of primarily grazing. The reclamation of the spoil does not include any terraces and the slopes will not exceed 3h:1v. This slope angle has been utilized at similar mining operations and found to be suitable for erosion control and revegetation of reclaim slopes. The long term static safety factor for these slopes is estimated to be 1.6 to 1.7.

- *R645-301-745.100: General Requirements.*

745.110: Excess Spoil will be placed in designated disposal areas within the permit area, in a controlled manner to:

745.111: Minimize the adverse effects of leaching and surface water runoff from the fill on surface and underground water;

Reclamation of the excess spoil will include a topsoil cover and subsoil layer. Infiltration through the reclamation is expected to be minimal based on the high clay content of these soils. In addition, laboratory data for the overburden shows that there is minimal potential for leaching of pollutants should infiltration rates become higher than expected.

The foundation of the excess spoil area also has high clay content with minimal potential for infiltration. This will provide an additional, natural barrier to protect ground water present beneath the proposed structure.

745.112: Ensure permanent impoundments are not located on the completed fill. Small depressions may be allowed by the Division if they are needed to retain moisture or minimize erosion, create and enhance wildlife habitat or assist revegetation, and if they are not incompatible with the stability of the fill; and

Permanent impoundments are not planned on the excess spoil area. Small depressions are also not planned in the excess spoil and are not viewed as a necessary enhancement to final reclamation based on average annual moisture data and the proposed slope configuration of the pile.

745.113: Adequately cover or treat the excess spoil that is acid- and toxic forming with nonacid nontoxic material to control the impact on the surface and ground water in accordance with R645-301-731.300 and to minimize adverse effects on plant growth and approved postmining land use.

Laboratory data representative of the overburden planned for disposal in the excess spoil area does not show acid- and toxic forming characteristics.

745.120: Drainage Control. If the disposal area contains springs, natural or manmade water courses, or wet weather seeps, the fill design will include diversions and underdrains as necessary to control erosion, prevent water infiltration into the fill and ensure stability.

A spring and seep survey available in Chapter 7 has identified no springs or wet weather seeps in the proposed excess spoil area. The final surface will be appropriately regraded to a contour that will route natural water from snowmelt and rainfall around the excess spoil as shown on the final contours Drawing 5-35. There are no manmade water courses present in the excess spoil area. No underdrains are planned for the excess spoil structure.

745.121: Diversions will comply with the requirements of R645-301-742.300

No diversions are planned in the excess spoil area.

745.122 : Underdrains

No underdrains are planned in the excess spoil area.

745.300: Durable Rock Fills

No Durable Rock fills are planned.

745.400: Preexisting Benches

The MRP does not contemplate disposal of excess spoil on preexisting benches.

Alton Coal Development, LLC will provide the Division, as part of the annual report for each calendar year, Drawing 5-38 or if the alternate highwall method is selected Drawing 538-A. The Drawing will provide an as-built of the reclamation sequence, depicting the acres of open pit and /or trench, the acres backfilled, the acres fully reclaimed (topsoiled and seeded) and revisions to the reclamation timetable. This information will be submitted by March 28th of each calendar year with the appropriate C1/C2.

560. Performance Standards

Coal mining and reclamation operations will be conducted in accordance with the approved permit and requirements of R645-301-510 through R645-301-553.

Appendix 5-9

Norwest Corporation Underground
Letter Report.

Pillar Sizing ROW 7-Entry

NORWEST
CORPORATION

John C. Lewis
Manager, Underground Mining

March 19, 2013

File No. 593-2

Mr. Larry W. Johnson
Manager
Alton Coal Development, LLC
463 North 200 West
Cedar City, Utah 84721

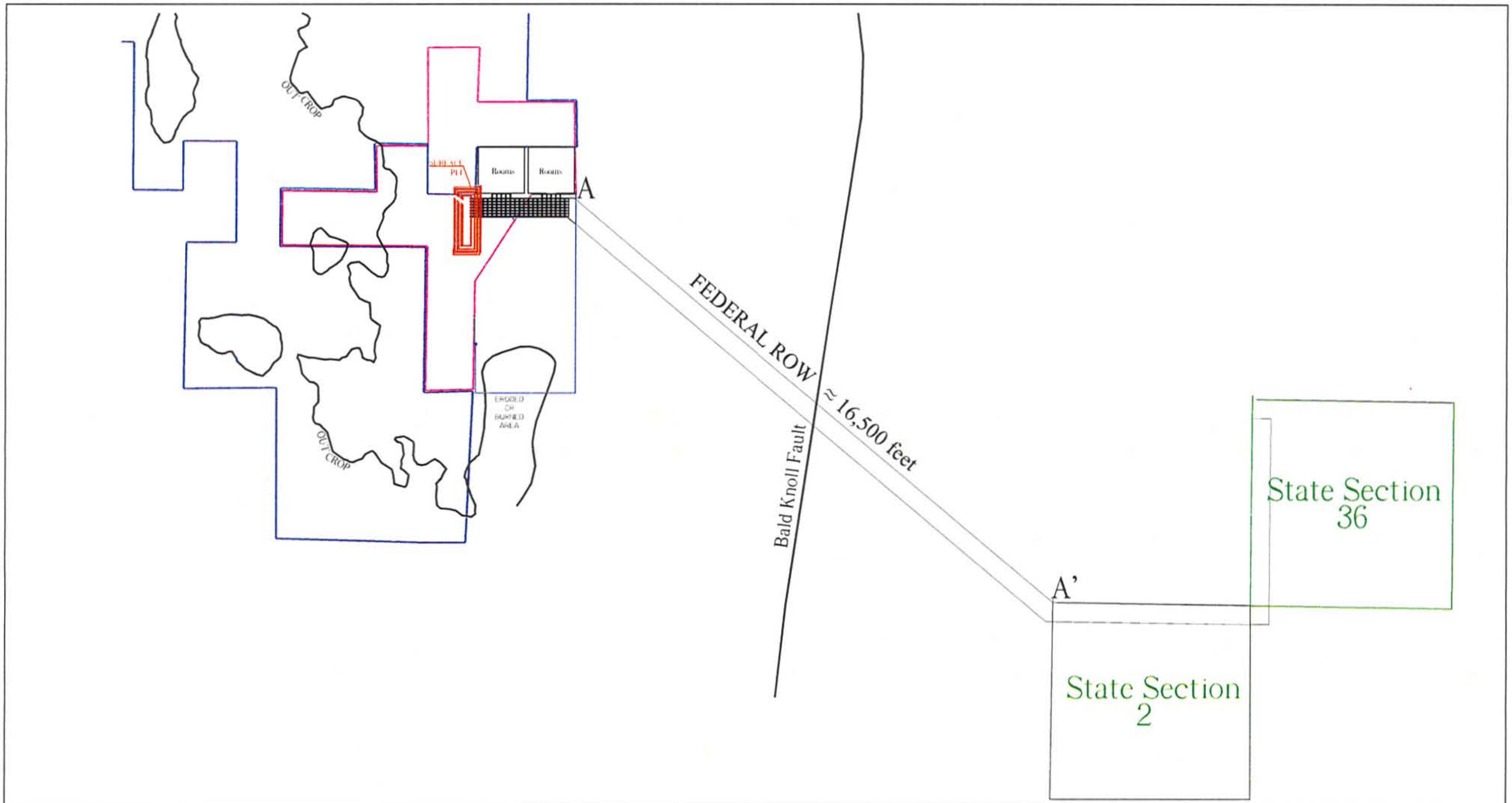
Subject: Pillar Dimensions for Federal ROW

Dear Mr. Johnson:

This letter addresses your inquiry regarding recommended conceptual pillar designs for underground mining areas of the Coal Hollow Project along the proposed Federal Right-of-Way (ROW) as illustrated in Figure 1. Norwest has utilized overburden depth information along the proposed Federal ROW provided by Alton Coal Development (Alton) to develop conceptual pillar designs. The discussions and recommendations below are not based upon site-specific geological/geotechnical information and/or conditions.

PILLAR STABILITY

Pillar stability design was conducted using an industry standard program developed by the National Institute for Occupational Safety and Health (NIOSH) in the United States. The stability program Analysis of Retreat Mining Pillar Stability (ARMPS) version 6.2.01 calculates stability factors based on estimates of the loads applied to, and the load bearing capacities of, pillars during the development and retreat mining operations. The ARMPS method has been verified through back analysis of pillar recovery case histories. To date, more than 600 case histories have been obtained from 10 states. These case histories cover an extensive range of geologic conditions, roof rock cavability characteristics, extraction methods, depths of cover, and pillar geometries. ARMPS is used as a basis for initial feasibility reviews where no previous mining history is available. This analysis program is a single seam analysis package and helpful in determining pillar size requirements based on depth, mining height, mine opening dimensions, pillar width, and pillar length.



N

0 1000 2000 3000
FEET

FIGURE 1

COAL HOLLOW PROJECT
FEDERAL ROW OVERVIEW
WITH CROSSECTION A - A' LOCATION

DATE: 03/18/2013	SCALE: 1:1500	NORWEST CORPORATION
FILE: 593-2\ROW		

The lack of coal strength testing results does not prevent single seam pillar size evaluation. U.S. researchers have found that Uniaxial Compressive Strength (UCS) of coal specimens was of no value in predicting the strength of coal pillars as laboratory tests do not measure the geologic features (like bedding planes and rock partings). The ARMPS program uses a default coal strength of 900 psi determined from historical analysis throughout U.S. coal mines.

In the case of the proposed Federal ROW, where subsidence is not permitted, Norwest has indicated pillar designs which make the possibility of collapse extremely unlikely. This is accomplished by maintaining pillar stability at 2.0 or greater, an aerial extraction of 50% or less, and a pillar w/h ratio in excess of 4.0.

SURFACE TOPOPGRAPHY AND OVERBURDEN DEPTH

Norwest has reviewed the cross section along the approximate 16,500 ft Federal ROW provided by Alton and divided it into four distinct areas based upon overburden depth as illustrated in Figure 2. Areas #1 through #4, represent areas for which Norwest has indicated specific pillar design widths for long-term stability.

ASSUMPTIONS & ANALYSES

Alton has initially indicated that a 7-entry configuration is required to meet ventilation requirements for the mining planned on the State Sections. Alton has also indicated that a 3-entry rock slope will be required across the Bald Knoll Fault which is estimated to possess a 200ft. vertical displacement. Norwest has not conducted stability analyses for the Bald Knoll Fault crossing, however since rock is typically much stronger than coal, pillar stability for the 3-entry rock slope is not expected to present stability issues that cannot be managed.

Alton has indicated that the maximum mining height and width for all coal development will be limited to 12ft and 20ft, respectively. Norwest has utilized a maximum mining height of 12ft, a maximum mining width of 20ft, an average coal pillar strength of 900 psi., and a crosscut angle of 90 degrees for all ARMPS calculations. All area extraction percentages were calculated using Carlson Software™ Underground Mining Module's "Advanced Projections" capability.

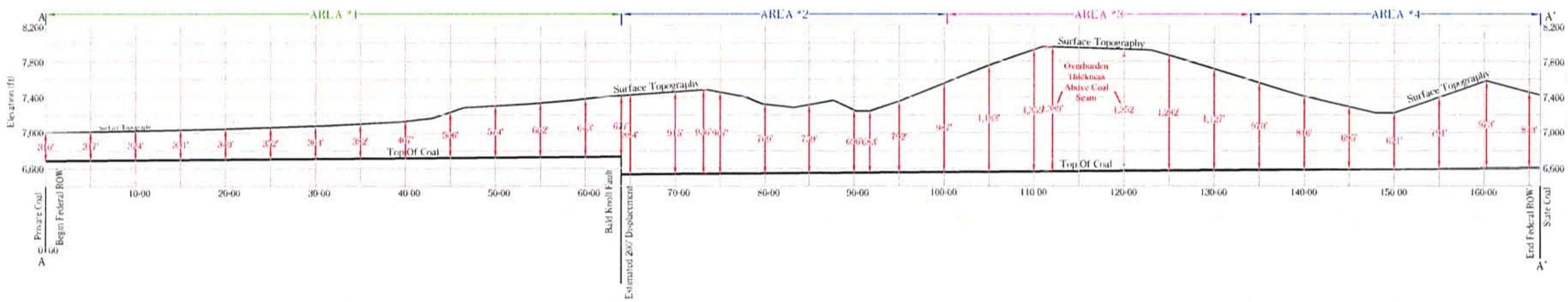


FIGURE 2

COAL HOLLOW PROJECT
FEDERAL ROW
CROSS SECTION A - A'

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7-Entry Configuration Area #1

Area #1 ranges in overburden depth from 310ft to 677ft. In order to assure that the risk of subsidence in Area #1 is remote, Norwest has selected pillar dimensions which result in less than 50% extraction by area. Norwest has selected a minimum pillar dimension of 60ft x 60ft (80ft x 80ft c-c) which results in 47.1% area extraction. Table 1 shows ARMPS Stability Factors (SF) for selected overburden depths and pillar configurations for Area #1.

Table 1 Area #1 7-Entry ARMPS SF for Selected Overburden Depths and Pillar Configurations

Overburden Depth (ft)	Entry Width (ft)	Mining Height (ft)	Entry Centers (ft)	Crosscut Centers (ft)	Stability Factor	Area Extraction %
310	20	12	80*	80	3.54	47.1%
400	20	12	80*	80	2.74	47.1%
550	20	12	80*	80	2.00	47.1%
600	20	12	80*	83	2.00	45.4%
700	20	12	80*	96	2.00	43.0%
700	20	12	85	91	2.00	42.6%
700	20	12	90	90	2.04	41.7%

*Norwest recommended entry centers.

It is noted, from Table 1, that as the overburden depth reaches 550ft, the crosscut spacing must be increased beyond 80ft centers to maintain a SF above 2.0, such that at a depth of 700ft, a 96ft crosscut center spacing is required. From Table 1 it can be concluded that a 60ft pillar width is adequate for Area #1 and that by increasing the crosscut spacing beyond 80ft centers, pillar SFs above 2.0 can readily be achieved. Increasing pillar widths beyond 60ft (80ft centers) allows for pillars that are more square than rectangular at depths above 550ft and may be selected to accommodate operational preferences.

7-Entry Configuration Area #2

Area #2 ranges in overburden depth from 683ft to 1,000ft and would begin at the bottom of the proposed 3-entry rock slopes across the Bald Knoll Fault. Table 2 shows ARMPS SFs at selected overburden depths and pillar configurations for Area #2.

Table 2 Area #2 7-Entry ARMPS SF for Selected Overburden Depth and Pillar Configurations

Overburden Depth (ft)	Entry Width (ft)	Mining Height (ft)	Entry Centers (ft)	Crosscut Centers (ft)	Stability Factor	Area Extraction %
1,000	20	12	80	170	2.00	36.5%
1,000	20	12	85	147	2.00	36.4%
1,000	20	12	90	133	2.00	36.3%
1,000	20	12	95	121	2.00	36.3%
700	20	12	100*	100	2.32	38.1%
800	20	12	100*	100	2.11	38.1%
875	20	12	100*	100	2.00	38.1%
900	20	12	100*	104	2.00	37.5%
1,000	20	12	100*	116	2.00	35.9%
1,000	20	12	105	111	2.00	35.7%
1,000	20	12	110	110	2.03	35.0%
1,000	20	12	115	115	2.12	33.7%

*Norwest recommended entry centers.

From Table 2, it can be observed that several pillar widths may be selected that provide adequate pillar stability. Norwest recommends a pillar width of 80ft (100ft centers) for Area #2 that will allow flexibility to develop square or near square pillars in lieu of pillar widths which require larger crosscut distances (rectangular pillars). The actual pillar width to be developed is a decision which must be made by Alton to accommodate operational constraints, however a SF factor of 2.0 or greater should be maintained for any row of pillars developed. An 80ft x 80ft (100ft x 100ft c-c) has a SF of 2.32 at an overburden depth of 700ft, but as the overburden depth increases to 875ft, the dimension of the pillar must be increased to maintain a SF of 2.0 or greater.

<u>7-Entry Configuration Area #3</u>

Area #3 ranges in overburden depth from 1,000ft to 1,389ft. Table 3 shows ARMPS SFs for selected overburden depths pillar configurations for Area #3.

Table 3 Area #3 7-entry ARMPS SF for Selected Overburden Depth and Pillar Configurations

Overburden Depth (ft)	Entry Width (ft)	Mining Height (ft)	Entry Centers (ft)	Crosscut Centers (ft)	Stability Factor	Area Extraction %
1,400	20	12	100	198	2.00	30.4%
1,400	20	12	105	180	2.00	30.1%
1,400	20	12	110	165	2.00	30.2%
1,400	20	12	115	153	2.00	30.2%
1,000	20	12	120*	120	2.22	32.4%
1,100	20	12	120*	120	2.09	32.4%
1,175	20	12	120*	120	2.00	32.4%
1,200	20	12	120*	124	2.00	32.0%
1,300	20	12	120*	133	2.00	31.1%
1,400	20	12	120*	145	2.00	30.1%

*Norwest recommended entry centers.

From Table 3, it can be observed that several pillar widths could provide adequate pillar stability. Norwest recommends a pillar width of 100ft (120ft centers) for Area #3 that will allow flexibility to develop square or near square pillars in lieu of pillar widths which require larger crosscut distances (rectangular pillars), while maintaining a pillar width that is still operationally manageable. The actual pillar width to be developed is a decision which must be made by Alton to accommodate operational constraints, however a SF factor of 2.0 or greater should be maintained for any row of pillars developed.

7-Entry Configuration Area #4

Area #4 ranges in overburden depth from 621ft to 1,000ft. Norwest recommends a pillar width of 80ft (100ft centers) for Area #4 as the overburden depth range is similar to that of Area #2. Crosscut distances of 100ft or greater are indicated as applicable to the overburden depth as it changes to maintain a SF of 2.0 or greater.

ARMPS GRAPHS

Norwest has prepared several ARMPS output graphs (attached) for informational purposes that illustrate how pillar SF varies with overburden depth and crosscuts spacing. Graphs #1 - #3 illustrate how pillar stability varies with crosscut spacing at a mining height of 12ft for selected pillar widths, and maximum overburden depths for Areas #1 - #4 of Figure 2. Graphs #4 - #6 illustrate how pillar stability varies with overburden depth and mining height for selected pillar sizes for Areas #1 - #4 of Figure 2.

Sincerely,

NORWEST CORPORATION

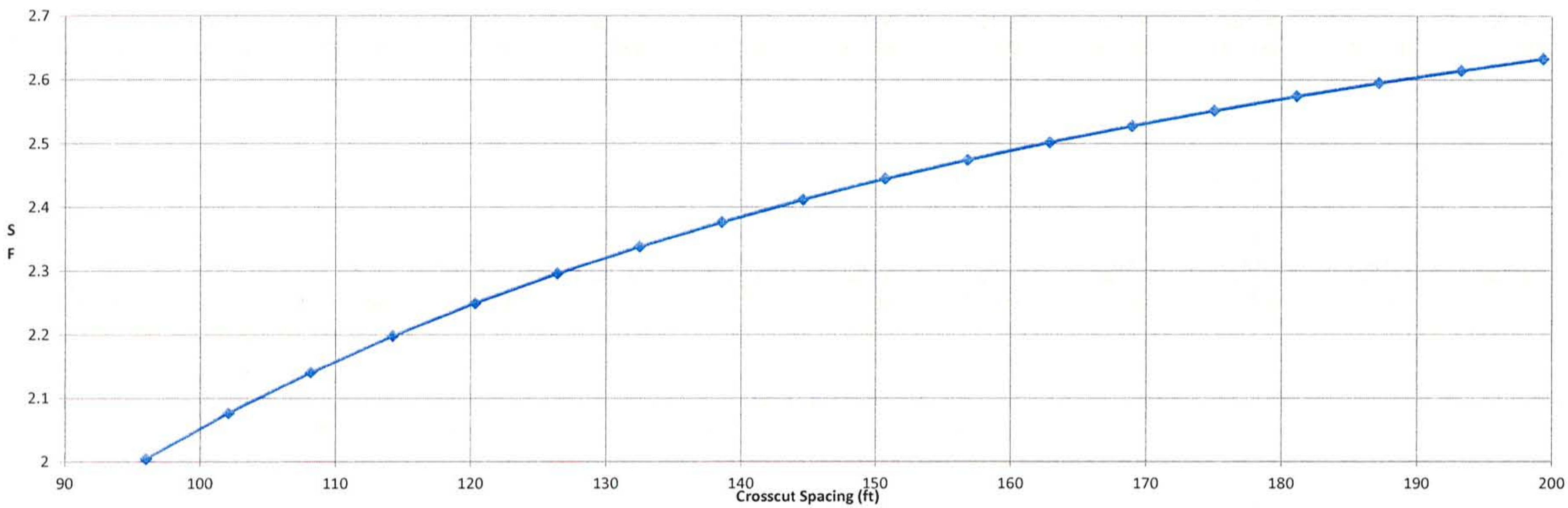
John C. Lewis

John C. Lewis, P.E.

Attachments

UTAH REGISTERED PROFESSIONAL ENGINEER
11-5-14
#191488
JOHN CHRISTOPHER LEWIS

Graph # 1 Area #1: 7- Entry 1SF vs. XC Spacing for 80 ft. c-c Pillar Width @ 700 ft. Overburden Depth (12 ft. Mining Height)



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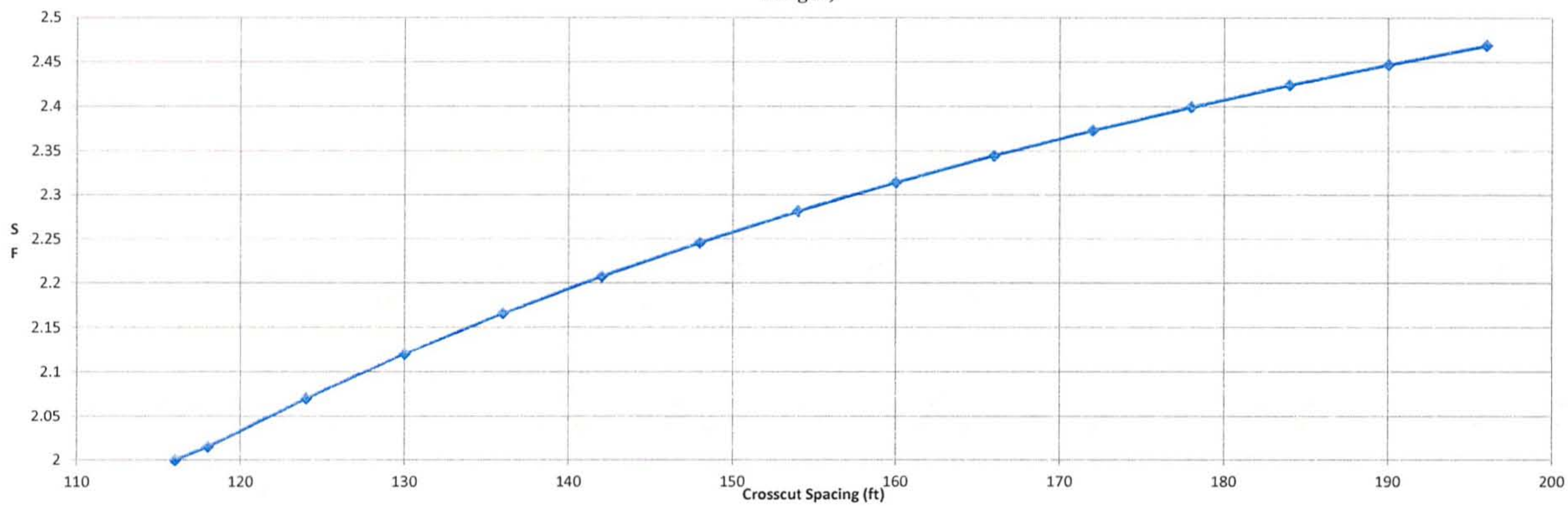
Graph # 2 Areas #2 & #4: 7- Entry SF vs. XC Spacing for 100 ft. c-c Pillar Width @ 1,000 ft. Overburden Depth (12 ft. Mining Height)



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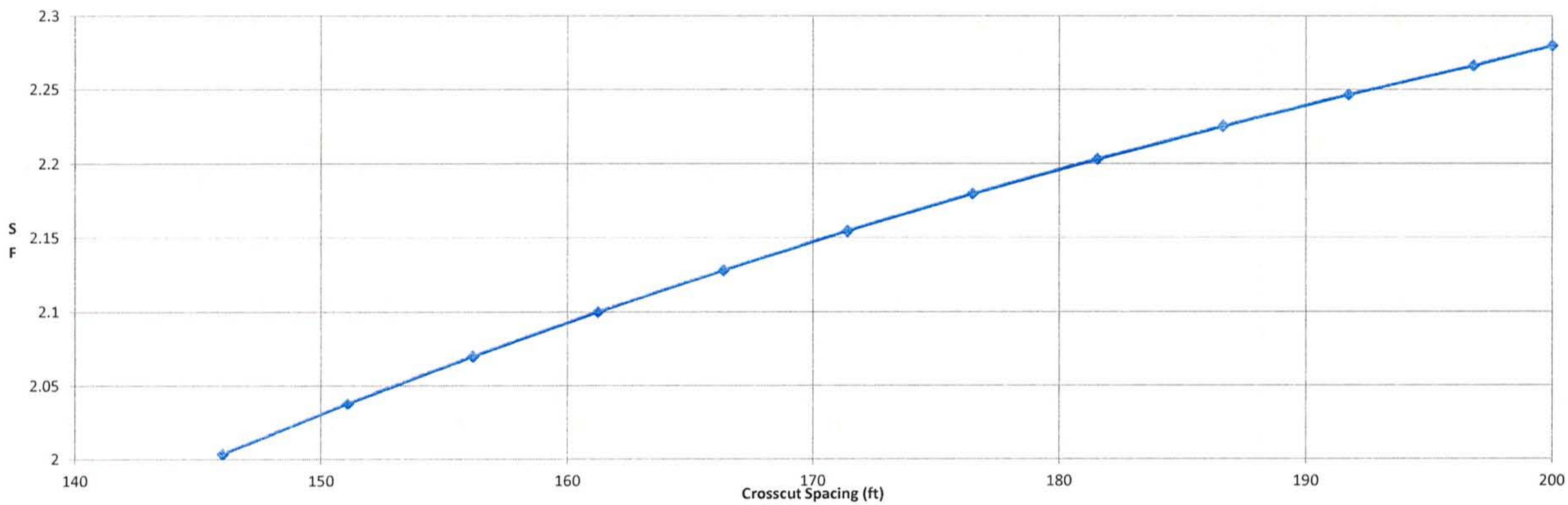
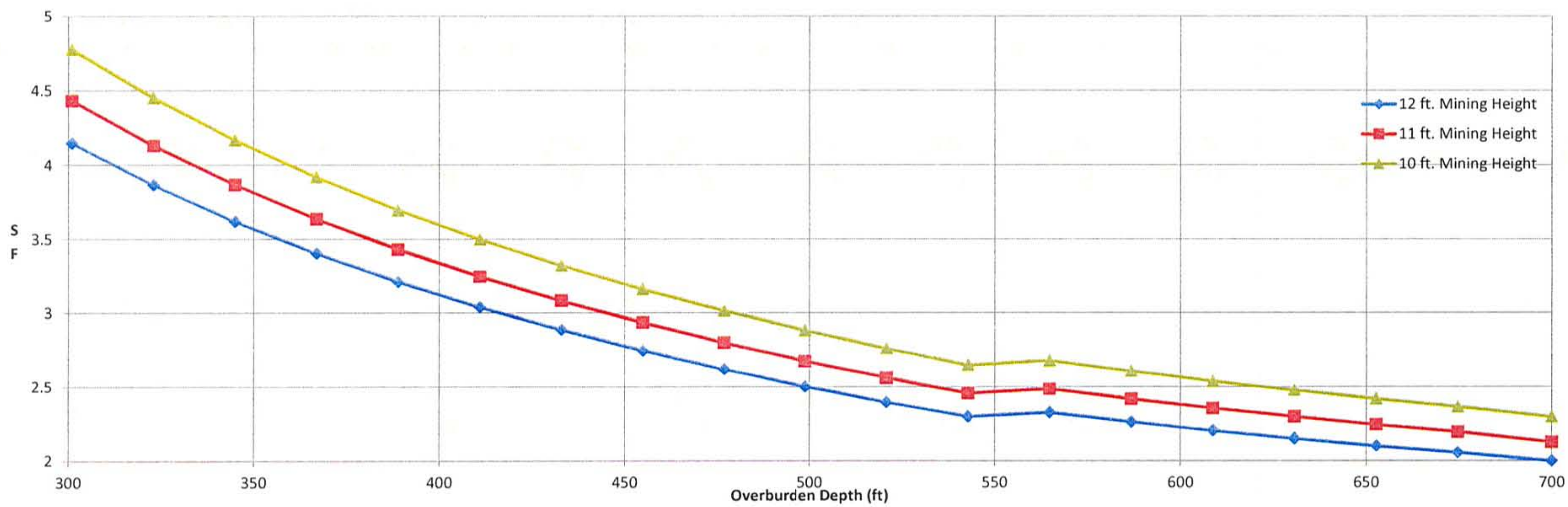
Graph # 3 Area #3: 7- Entry SF vs. XC Spacing for 120 ft. c-c Pillar Width @ 1,400 ft. Overburden Depth (12 ft. Mining Height)



Graph # 4 Area #1: 7- Entry Overburden Depth vs. 80 ft. x 96 ft. c-c Pillar SF



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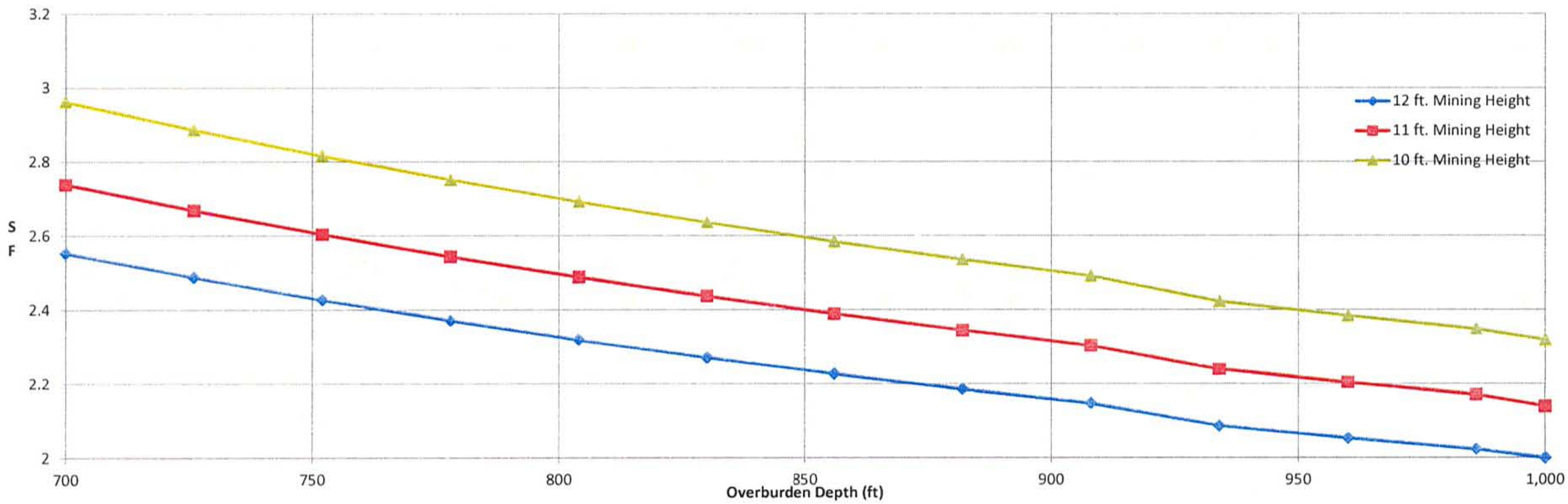
Graph # 5 Areas #2 & #4: 7- Entry Overburden Depth vs. 100 ft. x 116 ft. c-c Pillar SF



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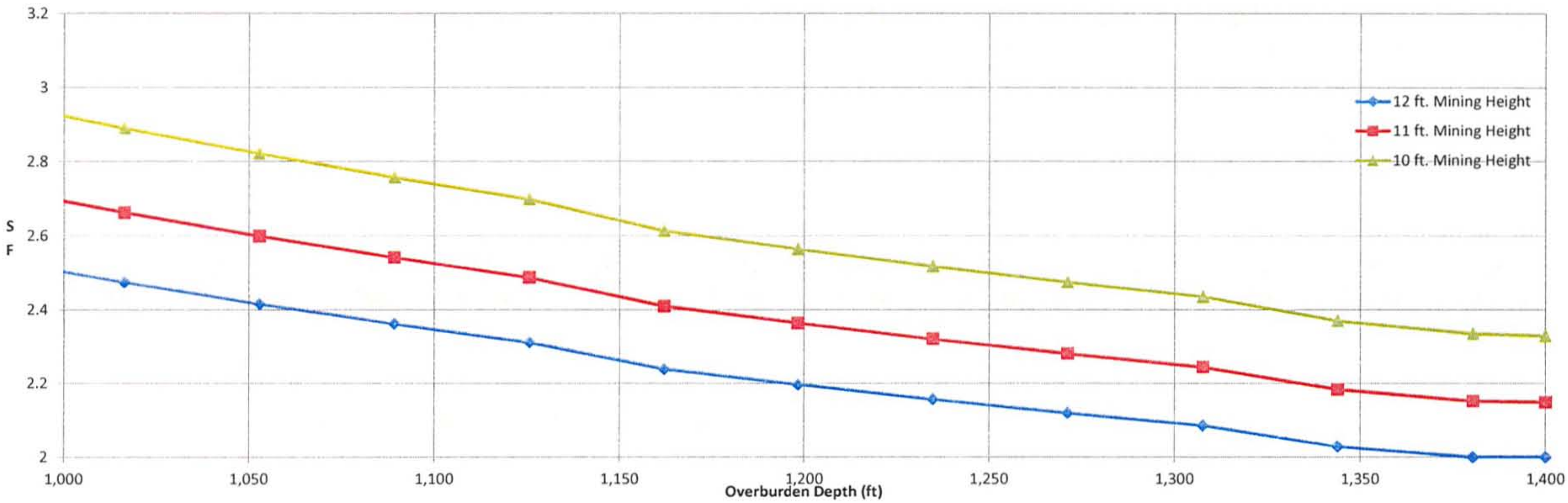
Graph # 6 Area #3: 7- Entry Overburden Depth vs. 120 ft. x 145 ft. c-c Pillar SF



NORWEST CORPORATION

Pillar Sizing at 300 ft or Less

NORWEST
CORPORATION

John C. Lewis
Manager, Underground Mining

March 19, 2013

File No. 593-2

Mr. Larry W. Johnson
Manager
Alton Coal Development, LLC
463 North 200 West
Cedar City, Utah 84721

Subject: Pillar Dimensions in Areas with Less than 300ft Overburden

Dear Mr. Johnson:

This letter addresses your inquiry regarding recommended minimum pillar dimensions for underground mining areas of the Coal Hollow Project with overburden depths less than 300ft. The discussions and recommendations below are not based upon site-specific geological/geotechnical information and/or conditions. Additionally, the discussions and recommendations below do not consider any site-specific mine layouts and therefore should be utilized for general guidance only.

WIDTH TO HEIGHT RATIO

In order to avoid potential pillar failure, it is recommended that any systematic pillar development be limited to those having a w/h ratio in excess of 4.0. Indicated mining heights for the underground mine are 12ft, therefore minimum pillar widths should be at least 48ft (68ft c-c). This should not be construed to mean that any pillar with a w/h ratio less 4.0 is prone to failure.

% EXTRACTION

In order to provide indefinite pillar stability, the percentage of extraction should be maintained to less than 50% for any given mining development (panel or mains). In the case of a seven-entry square pillar 48ft x 48ft (68ft x 68ft c-c) configuration, the percentage of extraction is 52.5%. In the case of a five-entry square pillar configuration having the same dimensions, the percentage extraction is 53.6%. The extraction percentage for both of the 5-entry and 7-entry configuration slightly exceeds the 50% threshold so the length and/or width of the pillars must be increased. For a 7-entry configuration a square pillar of 52ft x 52ft (72ft x 72ft c-c) or a rectangular pillar of 48ft x 58ft (68ft x 78ft c-c) is required to reduce the extraction to 50%. For a 5-entry configuration a square pillar of 55ft x 55ft (75ft x 75ft c-c) or a rectangular pillar of 48ft x 64ft (68ft x 84ft c-c) is required to reduce the extraction ratio to 50%. There are of course a number of rectangular pillar configurations for the 7-entry and 5-entry configurations that are capable of achieving a 50% extraction ratio.

MINING WIDTH & HEIGHT SENSITIVITY

Mining widths for entries and crosscuts should be maintained at less than 20ft to help maintain the integrity of the roof which in turn maintains pillar stability. Note that the ARMPS pillar stability factor for a 55ft x 55ft (75ft x 75ft c-c), entry pillar configuration at an overburden depth of 300ft falls from 3.28 to 2.97(a decrease of 9.5%) when the mining width is increased from 20ft to 22ft This increase in mining width also increases percentage extraction from 50% to 52.6%.

Mining heights should be maintained at a maximum of 12ft for a 48ft wide pillar in order to maintain the suggested w/h ratio of 4.0. A mining height of 14ft would indicate a pillar width of 56ft and given that the seam thickness is typically in the range of 14ft, it may be prudent to develop pillar widths of at least 55ft to insure that any failures of the planned roof coal over the long term does not result in pillar w/h ratios in excess of 4.0, which may eventually lead to pillar failure and subsequent surface subsidence at these shallow depths.

MINIMUM OVERBURDEN DEPTH

Norwest recommends that mining in areas less than 120ft (10 times the height of mining) of overburden thickness be avoided. Mining at such shallow depths increases the risks of subsidence due to void migration should failure of the mine openings (entry roof) occur, such failures could eventually result in "sink holes". This risk is compounded in areas of unconsolidated and/or weak overburden that are susceptible to flow in the presence of water.

Sincerely,

NORWEST CORPORATION

John C. Lewis

John C. Lewis, P.E.

UTAH REGISTERED PROFESSIONAL ENGINEER
11-5-14
#191488
JOHN
CHRISTOPHER
LEWIS
John C. Lewis

Description of Coal Seam Geology

The coal seams in the Alton Coal Field are located in the Smoky Hollow Member of the Straight Cliffs Formation, and in the Dakota Formation. The coal seam in the Smoky Hollow Member, which occurs within the lower 3 feet of the Member, is only a few inches in thickness and is not of economic importance. Within the Dakota Formation, two regionally important coal zones are present. These include the Smirl coal zone, which is located near the upper formational contact with the Tropic Shale, and the Bald Knoll coal zone, which is located about 200 feet below the Smirl coal zone near the base of the Dakota Formation. Doelling (1972) reported that the Smirl coal zone is 14 to 18 feet thick without splits, while the Bald Knoll coal zone contains several coal seams separated by thin splits, with the thickest seam being 4.8 feet thick. Doelling (1972) reports that coal in the Alton area is a high-volatile Bituminous coal. Additional information on coal quality is presented in Appendix 6-1 (confidential binder).

~~The coal seams in the Alton Coal Field are located in the Smoky Hollow Member of the Straight Cliffs Formation, and in the Dakota Formation. The coal seam in the Smoky Hollow Member, which occurs within the lower 3 feet of the Member, is only a few inches in thickness and is not of economic importance. Within the Dakota Formation, two regionally important coal zones are present. These include the Smirl coal zone, which is located near the upper formational contact with the Tropic Shale, and the Bald Knoll coal zone, which is located about 200 feet below the Smirl coal zone near the base of the Dakota Formation.~~

Within the Alton Quadrangle, five small mines and two prospects have been worked. Production from these mines was small, with a total production from all mines of 35,000 and 50,000 tons from the late 1920s to 1969, when the last mine closed. The last operating mine in the Alton Coal Field was the Smirl Mine, which was located about 1.5 miles south of the town of Alton. In its last year of operation, a total of 1,597 tons of coal was produced. The Smirl Mine portal was sealed by the Utah Division of Oil, Gas and Mining in 1992.

622 **CROSS-SECTIONS, MAPS AND PLANS**

622.100
Elevations of the coal seam to be mined and locations of drill holes are listed in Table 6-1 and shown in Drawing 6-5. Drill hole collar elevations and intervals cored and plugged are shown in Table 6-1.

622.200
The depth and thickness of surrounding strata are shown on geologic cross-sections in Drawing 6-3. Additional information regarding thicknesses of strata in the proposed Coal Hollow Mine permit area from drilling information is given in Appendix 6-4. Information on the thickness of the Smirl coal zone is listed in Table 6-1. A Smirl coal zone thickness isopach map is presented in Drawing 5-14 . Two cross-sections through the proposed Coal Hollow Mine permit area, showing stratigraphic relationships, approximate overburden thickness, and coal seam thickness, together with a cross-section location map are presented in Drawings 6-6, 6-7, and 6-8. Two additional cross-sections showing stratigraphic relationships and approximate overburden thicknesses are

shown in Drawing 6-9. A geologic cross-section depicting regional stratigraphic relationships is shown in Drawing 6-2. An overburden isopach map is provided in Drawing 5-15. A cross-section through the proposed underground mining area is provided in Drawing 6-12.

Representative drill hole logs depicting the nature, depth and thickness of the coal seam to be mined and rider seams in the overlying strata and the nature of the Dakota Formation strata immediately below the coal seam to be mined are presented in Appendix 6-4. No rider seams are present in the overburden strata in the proposed coal mining area.

622.300
The outcrop line of the seam to be mined (Smirl coal zone) is shown on the geologic map in Drawing 6-1 .The strike and dip of the Smirl coal zone in the permit area is also shown on Drawings 6-1 and 6-6.

622.400
No oil and gas wells exist within the proposed Coal Hollow Mine permit area.

623 **GEOLOGIC INFORMATION**

623.100 Acid or Toxic-Forming Strata

No acid-forming or toxic-forming strata are present in strata overlying or in the stratum immediately below the Smirl coal seam in planned mining areas in the proposed Coal Hollow Mine permit area.

Chemical information on the acid- and toxic-forming potential of earth materials naturally present in the proposed permit area are presented in Appendix 6-2. Chemical information on the low-sulfur Smirl coal zone proposed for mining is presented in Appendix 6-1 (confidential binder). Based on laboratory analytical data, it is apparent that acid-forming and toxic-forming materials that could result in the contamination of surface-water or groundwater supplies in the proposed Coal Hollow Mine permit and adjacent area are generally not present.

Selenium was not detected in any of the samples from the proposed Coal Hollow Mine permit area. Likewise, concentrations of water-extractable boron were also low, being less than 3 mg/kg in all samples analyzed. The pH of groundwaters in and around the proposed Coal Hollow Mine permit area are moderately alkaline. Data in Appendix 6-2 likewise indicate moderately alkaline conditions in sediments in the proposed permit area. The solubility of dissolved trace metals is limited in waters with alkaline pH conditions. Consequently, high concentrations of these metal constituents in groundwaters and surface waters with elevated pH levels are not anticipated.

The neutralization potential greatly exceeded the acid potential in all samples analyzed, with the neutralization potential commonly exceeding the acid potential by many times, suggesting that acid-mine-drainage will not be a concern at the proposed Coal Hollow Mine. Acid-forming materials in western coal mine environments often consist of sulfide minerals, commonly including pyrite and marcasite, which, when exposed to air and water, are oxidized causing the liberation of H^+ ions (acid) into the water. Oxidation of sulfide minerals may occur in limited amounts in the mine pits where oxygenated water encounters sulfide minerals. However, the acid produced by pyrite oxidation is quickly consumed by dissolution of abundant, naturally occurring carbonate minerals (Appendix 6-2). Dissolved iron is readily precipitated as iron-hydroxide in well aerated waters, and consequently excess iron is not anticipated in mine discharge water.

Other acid-forming materials or toxic-forming materials have not been identified in significant concentrations nor are such suspected to exist in materials to be disturbed by mining.

Because of the overall low-permeability of the rock strata and sediments surrounding the mine workings (primarily the shales and claystones of the lower Tropic Shale), the potential for seepage of mine water into adjacent stratigraphic horizons is low. Additionally, because the floors of the mine pits need to be accessible in order to extract the coal, the mining operations will be carried out in such a manner that the accumulation of large amounts of water in the mine pits will be avoided.

Based on the information in Appendix 6-2 there is no indication that appreciable potential for acid or toxic formation is present.

It is anticipated that coal produced from the proposed Coal Hollow Mine will be shipped as a mine-run product. Thus, no coal processing wastes are anticipated.

623.200 Reclamation Feasibility

Based on the proposed mine plan and the existing geologic and hydrogeologic conditions encountered at the propose Coal Hollow Mine permit and adjacent area, it is anticipated that successful reclamation of the site will be feasible. Additional information on the feasibility of reclamation at the proposed Coal Hollow Mine permit area is given in Chapter 2 (soils) and Chapter 3 (biology) of this MRP. There are no special categories or circumstances associated with mining at the proposed Coal Hollow Mine permit area that would render reclamation unfeasible.

Most of the materials that will be handled as part of mining and reclamation activities in the proposed Coal Hollow Mine area are of low hydraulic conductivity (i.e. clays, shales, siltstones, claystones, etc.). Consequently, it is anticipated that groundwater seepage volumes through backfilled and reclaimed land surfaces in reclaimed mine pit areas and excess spoils storage areas will not be large. Additionally, reclaimed areas will be regraded, sloped, and otherwise managed to minimize the potential for land erosion, to restore approximate surface-water drainage patterns, and also to minimize the potential for ponding of surface waters on reclaimed areas (other than “roughening” or “gouging” of some areas to enhance reclamation). Thus, the potential for interactions between large amounts of disturbed earth materials and groundwaters and surface waters, which could result in leaching of chemical constituents into groundwater and surface-water resources, will be minimized.

Additionally, the mining plan calls for the emplacement of 40 inches of suitable cover material over backfilled areas made up of material types which could negatively impact vegetation (materials with elevated SAR ratios or other physical or chemical characteristics that could cause appreciable adverse impacts on vegetation).

Several investigations involving reclamation of surface disturbed areas in the vicinity have been performed by other entities. These included the use of test plots to measure reclamation feasibility and success. The results of these investigations have been presented in published documents (Ferguson and Frischknecht 1985; USDI 1975). These investigations have demonstrated the feasibility of successful reclamation in the area.

623-300 Subsidence Control Plan

~~The proposed mining in the proposed Coal Hollow Mine permit area does not include underground coal mining activities. This section is not applicable.~~The underground mining has limited exaction with no subsidence. Refer to Appendix 5-9 (Norwest Report) for geotechnical and design information. Do to the design and mining method of underground mining in this plan, no subsidence is projected and no monitoring is planned.

624 **GEOLOGIC DESCRIPTION**

624.100 Regional and Structural Geology

The coal to be mined in the proposed Coal Hollow Mine permit area is of Cretaceous age and resides in the Alton Coal Field of southwestern Utah. The Alton Coal Field is a roughly horseshoe-shaped region that is situated between the Kaiparowits Coal Field to the east, and the Kolob Coal Field to the west.

The topography in the Alton Coal Field is marked by bench and slope topography. Topographic relief in the region is approximately 2,800 feet, with elevations ranging from about 9,300 feet on top of the Paunsaugunt Plateau, to about 6,500 feet in the valley bottoms. The economic coal seams are located primarily along the western and southern flanks of the Paunsaugunt Plateau.

The geologic history, geology, stratigraphy, and structure of the Alton Coal Field have been described by Doelling (1972) and Tilton (Appendix 6-3; 2001) and are summarized below. A map of geologic formations exposed at the surface in the proposed Coal Hollow Mine permit area is shown in Drawing 6-1. Cross-sections showing the regional geologic conditions in the Alton Coal Field are presented in Drawings 6-3 and 6-9.

Stratigraphy

Stratigraphic units present in the Alton Coal Field area are described in ascending order below. A stratigraphic column showing these geologic formations is shown in Drawing 6-3. A diagrammatic correlation of Cretaceous units in southern and south-central Utah is shown in Drawing 6-4.

Navajo Sandstone (Lower Jurassic)

The Navajo Sandstone is a light gray to tan, locally cross-bedded, massive eolian sandstone that underlies the region. Where exposed south of the Alton area, it forms the regionally prominent White Cliffs topographic feature. The Thousand Pockets Tongue of the Navajo Sandstone intertongues with the overlying Carmel Formation. Thickness of the Navajo Sandstone exceeds 1,000 feet in the Paunsaugunt Plateau region. The Navajo Sandstone does not crop out in the proposed Coal Hollow Mine permit and adjacent area.

Carmel Formation (Upper Jurassic)

The Carmel Formation unconformably overlies the Navajo Sandstone in the region. The Carmel Formation is heterogeneous and consists of limestone, siltstone, sandstone, and gypsum beds. The formation has been subdivided into several members by previous researchers. These include the Wiggler Wash Member, the Winsor Member, the Paria River Member, the Crystal Peak Member, and the Kolob Limestone Member. The thickness of the Carmel Formation ranges from about 650 to 800 feet in the Alton Coal Field area and the formation thickens to the west. The Winsor Member of the Carmel Formation crops out in the bottom of the Kanab Creek drainage about one mile south of the proposed Coal Hollow Mine permit area.

Entrada Sandstone (Upper Jurassic)

The Entrada Sandstone, which may be as thick as 500 feet regionally, is present above the Carmel Formation in the eastern portion of the Alton Coal Field. The formation consists predominantly of siltstone and cross-bedded or fine-grained massive sandstone. The formation is not present in the proposed Coal Hollow Mine permit and adjacent area.

Dakota Formation (Cretaceous)

The Dakota Formation contains the economic coal seams in the Alton Coal Field. The formation consists of fine- to medium-grained sandstone with interbedded gray shale, carbonaceous shale, and coal. In most locations, shaley strata dominate the formation, comprising about 60 to 75 percent of the formation. The unit characteristically forms ledge and slope topography. In the proposed Coal Hollow Mine permit area the Dakota Formation directly overlies the Carmel Formation. Regionally, the outcrop of the Dakota Formation forms the Gray Cliffs topographic feature. The economic coal seams in the Alton Coal Field are present near the base (Bald Knoll coal zone) and near the top of the formation (Smirl coal zone). Local thinner coal seams that are not of economic importance are present in the center of the formation. The thickness in the western portion of the Alton Coal Field is about 450 feet. In the eastern portion of the Alton Coal Field, the Dakota

Formation is about 150 feet thick and rests on the Entrada Sandstone.

Tropic Shale (Cretaceous)

The Tropic Shale consists predominantly of gray and carbonaceous silty shale and claystone with a few marine sandstone beds located mostly in its upper part. The formation typically weathers at the surface to a clayey soil that typically forms gentle, vegetated slopes. The Tropic Shale is present (in some locations covered with shallow alluvial or colluvial deposits) at the land surface over most of the proposed Coal Hollow Mine permit area. The formation was deposited in an open-marine offshore environment during the maximum westward transgression of the Cretaceous Western Interior Seaway in the Late Cretaceous (Tilton, 2001). Near the top of the formation, more sandy horizons are interbedded with the mudstone units of the formation. These sandy units together with the sandstone at the base of the overlying Straight Cliffs Formation reflect the initial sand influx onto the marine environment of the Tropic Shale. The thickness of the Tropic Shale in the Alton Quadrangle is about 700 feet. In areas planned for mining at the proposed Coal Hollow Mine permit area, only the lower 200 to 250 feet of the Tropic Shale is present. The middle and upper portions of the formation having been removed from proposed mining areas by erosion in Sink Valley.

Information obtained from continuous core drilling in the Tropic Shale in planned mining areas in the proposed Coal Hollow Mine permit area indicates that the lower 200 to 250 feet of the formation consists of a fairly uniform sequence of soft, dark gray silty shale or thinly bedded claystone with occasional thin lenses of siltstone and occasional layers of bentonite-like clay being present. Strong, competent rock strata that could be of consequence to surface mining operations were not encountered in any of the boreholes. Drilling information obtained from the Tropic Shale during the 2005 drilling program is presented in Appendix 6-4. Physical and chemical information from the Tropic Shale are presented in Appendix 6-2. The locations of the 2005 boreholes are shown in Appendix 6-4 and also on Drawing 6-5.

Straight Cliffs Formation (Cretaceous)

The Straight Cliffs Formation is approximately 1,200 feet thick in the Alton Quadrangle. The formation is comprised predominantly of calcite-cemented sandstone and mudstone, with sandstone composing about 75 percent of the total composition. The sandstones of the Straight Cliffs Formation make up the lower two-thirds of the ledges radiating out from the southern Paunsaugunt Plateau. Four members of the Straight Cliffs Formation have been identified in the Alton Quadrangle by Tilton (2001). These include the Tibbet Canyon Member (orange-gray weathering fine- to medium grained sandstone), the Smoky Hollow Member (interbedded sandstone, mudstone, and thin coal), the John Henry Member (interbedded mudstone and fluvial sandstone), and Drip Tank Member (light-gray cliff forming sandstone). The Straight Cliffs Formation outcrops on the hillsides east and north of the proposed Coal Hollow Mine permit area.

Wahweap and Kaiparowits Formations (Cretaceous)

The Wahweap Formation is composed of alternating sandy shales and thin- to thick-bedded sandstones. The unit contains carbonaceous shale and thin coal beds that are not of economic importance in its lower part. The unit forms step-like topography. Regionally, the Wahweap Formation is separated from the overlying Kaiparowits Formation by an unconformity. Erosion of both the Wahweap and Straight Cliffs Formations prior to the deposition of the Kaiparowits Formation may have locally reduced the thicknesses of these formations in the vicinity of the Paunsaugunt Plateau. The Kaiparowits Formation is composed of irregular beds of arkosic sandstone. The sandstone is weakly cemented by calcite cement. Because of difficulties identifying mappable boundaries between the Wahweap and Kaiparowits Formations in the Alton Quadrangle, the formations were mapped as an undivided unit (Tilton, 2001). The total thickness of the Wahweap and Kaiparowits Formations in the Alton Quadrangle ranges from about 600 to 800 feet.

Claron Formation (Tertiary)

The Claron Formation (also sometimes known as the Wasatch Formation, although the Utah Geological Survey uses the name Claron Formation) forms the cap rock over much of the Paunsaugunt Plateau. The formation is also present west of the Sevier Fault Zone west and north of the town of Alton. The unit is subdivided into a lower pink (also known as red) member and an upper white member, both consisting mostly of massive, fine-grained crystalline limestone of fluvial and lacustrine origin. Resistance to erosion varies both vertically and horizontally in the Claron Formation, resulting in a series of cliffs and steep joints. This condition, together with the presence of closely spaced joints, produces the unique topography associated with the Claron Formation. The Claron Formation is about 800 thick in the Alton Quadrangle. Also mapped together with the Claron Formation in the Alton Quadrangle is the Cretaceous Canaan Peak Formation. The Canaan Peak is a thin, discontinuous formation consisting primarily of conglomerate and conglomeratic sandstone with some mudstone interbeds sometimes present at the base of the Claron Formation. Thickness of the Canaan Peak Formation locally ranges from 0 to 30 feet.

Brian Head Formation (Tertiary)

The Brian Head Formation consists of interbedded pink and purplish-gray very fine-grained sandstone, friable sandstone, conglomerate, siltstone, mudstone, and limey mudstone in its lower part, and gray to white, fine- to medium-grained sandstone and calcarenite, in part with a volcanically derived clay matrix. The formation includes rocks present above the underlying white member of the Claron Formation and the overlying ash-flow tuff of the Needles Range Group. The unit is not resistant to erosion and has been eroded away from the top of the Paunsaugunt Plateau in the Alton Quadrangle. The formation is present in the rugged hills west of the Sevier Fault zone near the town of Alton. The unit is about 200 feet thick in the Alton Quadrangle.

Quaternary Deposits

Quaternary deposits present in the area include pediment alluvium, landslide deposits, mass-wasting debris, and alluvium.

The pediment alluvium deposits in the region consist of poorly sorted alluvial and colluvial silt, sand, and gravel deposited on broad pediments. After deposition, the pediment surfaces were abandoned as streams have cut down to lower levels.

Landslide deposits in the area are primarily gravity-transported hummocky deposits of mud, sand, and occasional blocks of sandstone. Most of the landslide deposits originated from the lower portion of the Straight Cliffs Formation and slid onto the underlying Tropic Shale, although movement within the Tropic Shale has also occurred. A conspicuous series of progressively built landslide deposits is present east of the Alton Amphitheater as a broad, rolling apron below the lowest cliffs of the Straight Cliffs Formation. The thickness of the landslide deposits locally ranges from a few feet to more than 100 feet.

Alluvium deposits in the region consist of unconsolidated clay, silt, sand, and gravel in and near existing drainages. These deposits exist as stream and fan alluvium and terrace deposits. In the headwaters of the mountain streams, the alluvial material consists predominantly of sand and gravel. In downstream areas, the alluvial material consists mostly of mud derived from the Tropic Shale. Alluvial thickness in the Alton Quadrangle typically ranges from a thin covering to about 10 feet or more.

In the Sink Valley and Lower Robinson Creek drainages near the proposed Coal Hollow Mine permit area, drilling information indicates that alluvial thicknesses are in some locations considerably greater. Alluvial thicknesses measured in the permit and adjacent area range from a thin veneer overlying bedrock formation in many areas to at least 140 feet in thickness along the eastern margins of Sink Valley (see Drawing 6-3). Much of the land surface in the proposed Coal Hollow Mine permit area consists of fan alluvium (mostly composed of clays, silts, and fine-grained sands) derived largely from the highly erodable Tropic Shale in adjacent highland areas east of the proposed permit area. Field investigations suggest that these fan deposits are associated with sheetfloods, debris flows and mud flows. Additional geologic information on alluvial deposition in the proposed Coal Hollow Mine permit and adjacent area is presented in Appendix 7-1.

An igneous dike consisting of black, fine-grained porphyritic olivine basalt is present northeast of Alton near Kanab Creek.

Structure

Rock strata in the region dip gently toward the north and north-east, generally from 1 to 5 degrees. The Alton Coal Field is bounded on the east by the Paunsaugunt Fault and on the west by the Sevier Fault. Regional displacements on these two faults are about 1,000 to 2,000 feet, and 100 to 800 feet, respectively. Additionally, several faults with lesser displacements have been mapped in the region, including the Sand Pass Fault zone (about 400 feet of offset), the Bald Knoll Fault (about 650 feet of offset), and the Sink Valley Fault (likely a few tens of feet of offset). Most local faults in the Alton Quadrangle trend in a northerly or north-westerly direction, are several miles long, and are near vertical. A prominent north- to northwest-trending vertical joint set is present in the Upper Cretaceous sandstone rocks in the region. Stratal dips vary appreciably near the fault zones.

The Sink Valley Fault extends in a roughly north-south direction through the proposed Coal Hollow Mine permit area from upland areas north of the permit area southward through the central part of the proposed permit area subsequently further south near the eastern edge of the proposed permit area (Drawing 6-1; Appendix 6-3; Drawing 6-2). The fault has down-dropped the strata on the west side of the fault (Appendix 6-3). The offset on the Sink Valley Fault is not known precisely, however based on drilling information from the proposed permit and adjacent area it is apparent that offset on the fault in the vicinity of the proposed Coal Hollow Mine permit area is a few 10s of feet or less.

Description of Coal Seam Geology

The coal seams in the Alton Coal Field are located in the Smoky Hollow Member of the Straight Cliffs Formation, and in the Dakota Formation. The coal seam in the Smoky Hollow Member, which occurs within the lower 3 feet of the Member, is only a few inches in thickness and is not of economic importance. Within the Dakota Formation, two regionally important coal zones are present. These include the Smirl coal zone, which is located near the upper formational contact with the Tropic Shale, and the Bald Knoll coal zone, which is located about 200 feet below the Smirl coal zone near the base of the Dakota Formation. Doelling (1972) reported that the Smirl coal zone is 14 to 18 feet thick without splits, while the Bald Knoll coal zone contains several coal seams separated by thin splits, with the thickest seam being 4.8 feet thick. Doelling (1972) reports that coal in the Alton area is a high-volatile Bituminous coal. Additional information on coal quality is presented in Appendix 6-1 (confidential binder).

~~The coal seams in the Alton Coal Field are located in the Smoky Hollow Member of the Straight Cliffs Formation, and in the Dakota Formation. The coal seam in the Smoky Hollow Member, which occurs within the lower 3 feet of the Member, is only a few inches in thickness and is not of economic importance. Within the Dakota Formation, two regionally important coal zones are present. These include the Smirl coal zone, which is located near the upper formational contact with the Tropic Shale, and the Bald Knoll coal zone, which is located about 200 feet below the Smirl coal zone near the base of the Dakota Formation.~~

Within the Alton Quadrangle, five small mines and two prospects have been worked. Production from these mines was small, with a total production from all mines of 35,000 and 50,000 tons from the late 1920s to 1969, when the last mine closed. The last operating mine in the Alton Coal Field was the Smirl Mine, which was located about 1.5 miles south of the town of Alton. In its last year of operation, a total of 1,597 tons of coal was produced. The Smirl Mine portal was sealed by the Utah Division of Oil, Gas and Mining in 1992.

Groundwater

The depositional history of geologic formations in the proposed permit and adjacent area has resulted in a heterogeneous sequence of rocks that have a profound effect on the movement and availability of groundwater. The stratigraphic package located in the upland regions along the Paunsaugunt Plateau lies well beyond the zone that could potentially be impacted by mining operations in the proposed Coal Hollow Mine permit area. With the exception of the Navajo Sandstone, the rock formations present along the flanks of the Paunsaugunt Plateau area are typically lenticular in nature. Although aquifer-quality rocks may be present in lenses within individual geologic formations, the fact that the lenses are discontinuous in their extent and are typically encased in a surrounding low-permeability matrix, regional type groundwater flow regimes typically do not form. Additionally, because the geologic formations in the Paunsaugunt Plateau overlying the Tropic Shale are truncated by the plateau escarpment, long, regional type groundwater flow paths typically cannot exist in the proposed permit area. In the immediate vicinity of the proposed Coal Hollow Mine permit and adjacent area, the only bedrock formations that crop out are the Tropic Shale and underlying Dakota Formation. The Windsor Member of the Carmel Formation also crops out at the surface about one mile southwest of the proposed permit area. The water-transmitting properties of the lower portion of the marine Tropic Shale unit that overlies the Smirl coal seam in areas proposed for mining are poor.

Lithologic data collected during continuous core drilling in the Tropic Shale indicate that the rocks of the Tropic Shale in the proposed mining area are composed almost entirely of a fairly uniform sequence of dark gray shale, silty shale, and claystone with high clay content. No appreciable water was encountered during drilling activities in the Tropic Shale in the proposed mining areas and no appreciable spring discharge from formation has been observed. The Tropic Shale in the proposed permit area is underlain by the Dakota Formation, which crops out in the western portion of the proposed permit area and in the bottoms of the Kanab Creek drainage (Drawing 6-1; Appendix 6-3). Vertical recharge to the Dakota Formation through the overlying Tropic Shale is likely negligible due to the poor groundwater transmitting properties of the Tropic Shale discussed above. In addition to the lack of vertical recharge to the Dakota Formation, vertical and horizontal groundwater flow in the formation is impeded because of the abundant presence of low-permeability shaley strata that encase potentially permeable lenticular sandstone strata both vertically and horizontally. Consequently, the potential for the transmission of appreciable quantities of groundwater through the formation is limited (i.e., it is not a good aquifer). Consequently, groundwater discharge from the rocks of the Dakota Formation in the proposed permit area is not appreciable. Because vertical recharge to the Dakota Formation from the Tropic Shale is minimal, the removal of the Tropic Shale from above the Dakota Formation during mining operations followed shortly thereafter by the backfilling and reclamation of mine pits with low-permeability materials would likely not detrimentally impact groundwater systems in the Dakota Formation (i.e., the post-mining conditions will be similar to the pre-mining conditions) .

Shallow groundwater systems have been identified in alluvial sediments in the proposed Coal Hollow Mine permit and adjacent area, most notably in Sink Valley. These shallow alluvial groundwater systems exist in much of Sink Valley and in some locations in the Lower Robinson Creek drainage. The alluvial groundwater systems are likely recharged along the flanks of the Paunsaugunt Plateau through mountain-front-recharge processes. Groundwater flow directions in these alluvial groundwater systems is generally from recharge areas east of the proposed permit area toward lower elevation areas to the west and south. In most locations near the proposed Coal

Hollow Mine permit area, the alluvial groundwater systems are directly underlain by the low-permeability Tropic Shale bedrock, which likely prevents appreciable downward migration of the alluvial groundwater into deeper formations. Additional information on groundwater resources in the proposed Coal Hollow Mine permit and adjacent area is provided in Chapter 7 of this MRP and in Appendix 7-1.

624.110 Cross Sections, Maps, Plans.

624.120 Information for this section is found in R645-301-624.200, R645-301-624.300 and R645-301-625.

624.130 Geologic Literature and Practices

The geologic literature utilized in preparing R645-301-600 is listed in the reference list presented at the end of this chapter.

Additional geologic data were collected during field investigations conducted by qualified personnel. Geologic analysis and geologic interpretations were performed by a registered professional geologist in the State of Utah. All practices and procedures for obtaining geologic information have been standard for the industry.

624.200

Samples have been collected and analyzed from test borings in the proposed permit area. The samples were collected from fresh, unweathered, uncontaminated drill cores. The samples were collected and analyzed from the ground surface down to and including the first stratum immediately below the Smirl coal zone to be mined. The laboratory analytical parameters analyzed were comprehensive and as recommended by the Division of Oil, Gas and Mining. Results of the analyses are presented in Appendix 6-2. Additional information regarding the physical and chemical characteristics of the Smirl coal zone to be mined are presented in Appendix 6-1 (confidential binder).

624.210

Geologic logs were prepared that show the lithologic characteristics including physical properties and thickness of each stratum and locations of groundwater where occurring. The well logs are presented in Appendix 6-1. Cross-sections prepared from geologic logs of drillholes in the proposed permit and adjacent area are provided in Drawing 6-3. Additional geologic logs are presented in Appendix 5-1 and Appendix 7-4. Additional lithologic characterization is provided in Appendix 7-1.

624.220

Chemical analyses of strata overlying and immediately below the Smirl coal zone for acid- or toxic-forming materials are presented in Appendix 6-2.

No acid-forming or toxic-forming strata are present in strata overlying or in the stratum immediately below the Smirl coal seam in planned mining areas in the proposed Coal Hollow Mine permit area.

Chemical information on the acid- and toxic-forming potential of earth materials naturally present in the proposed permit area are presented in Appendix 6-2. Chemical information on the low-sulfur Smirl coal zone proposed for mining is presented in Appendix 6-1 (confidential binder). Based on laboratory analytical data, it is apparent that acid-forming and toxic-forming materials that could result in the contamination of surface-water or groundwater supplies in the proposed Coal Hollow Mine permit and adjacent area are generally not present.

Selenium was not detected in any of the samples from the proposed Coal Hollow Mine permit area. Likewise, concentrations of water-extractable boron were also low, being less than 3 mg/kg in all samples analyzed. The pH of groundwaters in and around the proposed Coal Hollow Mine permit area are moderately alkaline. Data in Appendix 6-2 likewise indicate moderately alkaline conditions in sediments in the proposed permit area. The solubility of dissolved trace metals is usually limited in waters with alkaline pH conditions. Consequently, high concentrations of these metal constituents in groundwaters and surface waters with elevated pH levels are not anticipated.

The neutralization potential greatly exceeded the acid potential in all samples analyzed, with the neutralization potential commonly exceeding the acid potential by many times, suggesting that acid-mine-drainage will not be a concern at the proposed Coal Hollow Mine. Acid-forming materials in western coal mine environments often consist of sulfide minerals, commonly including pyrite and marcasite, which, when exposed to air and water, are oxidized causing the liberation of H^+ ions (acid) into the water. Oxidation of sulfide minerals may occur in limited amounts in the mine pits where oxygenated water encounters sulfide minerals. However, the acid produced by pyrite oxidation is quickly consumed by dissolution of abundant, naturally occurring carbonate minerals (Appendix 6-2). Dissolved iron is readily precipitated as iron-hydroxide in well aerated waters, and consequently excess iron is not anticipated in mine discharge water.

Other acid-forming materials or toxic-forming materials have not been identified in significant concentrations nor are such suspected to exist in materials to be disturbed by mining.

Because of the overall low-permeability of the rock strata and sediments surrounding the mine workings (primarily the shales and claystones of the lower Tropic Shale), the potential for seepage of mine water into adjacent stratigraphic horizons is low. Additionally, because the floors of the mine pits need to be accessible in order to extract the coal, the mining operations will be carried out in such a manner that the accumulation of large amounts of water in the mine pits will be avoided.

Based on the information in Appendix 6-2 there is no indication that appreciable potential for acid or toxic formation is present.

It is anticipated that coal produced from the proposed Coal Hollow Mine permit area will be shipped as a mine-run product. Thus, no coal processing wastes are anticipated.

624.230
Chemical analyses of the Smirl coal seam for acid- or toxic-forming materials including total sulfur and pyritic sulfur are presented in Appendix 6-1 (confidential binder).

624.300
~~The proposed mining in the proposed Coal Hollow Mine permit area does not include underground coal mining activities. This section is not applicable.~~Logs of drill holes are presented in Appendix 6-1. Chemical analysis of strata overlying and immediately below the coal seam are shown in Appendix 6-2. Chemical analysis of the coal seam for acid or toxic forming materials including total sulfur and pyritic sulfur are presented in Appendix 6-1 (Confidential binder).

624.340

Physical properties of the stratum immediately above and below the coal seam are shown in Appendix 6-1 (Confidential Binder)

627 **OVERBURDEN THICKNESS AND LITHOLOGY**

The planned mining in the proposed Coal Hollow Mine permit area does ~~not~~ include underground coal mining activities. Overburden thickness and lithology are shown in Appendix 6-1, and Drawing 5-15 and 6-3.

Overburden in planned mining areas in the proposed Coal Hollow Mine permit area consists of the following.

Alluvium

Alluvial sediments are present at the surface in most areas proposed for mining. These sediments consist primarily of clays, silts, and fine-grained sands. The thickness of the alluvium in proposed mining areas ranges from a thin veneer to about 50 feet. The alluvial sediments in most areas are not well sorted and are derived largely from weathering of the Tropic Shale in adjacent upland areas.

Tropic Shale

In all proposed mining areas, the lower portion of the Tropic Shale overlies the Dakota Formation Smirl coal zone to be mined. The thickness of the Tropic Shale overlying the coal seam in proposed mining areas ranges from a few feet up to about 200 feet. The lower Tropic Shale consists predominantly of soft shales, silty shales, and claystones, with occasional thin layers of siltstone and bentonite-like clay layers up to about 1 foot in thickness. Strong, competent rock strata were not encountered in exploration boreholes drilled during 2005 in the proposed Coal Hollow Mine permit area. Well logs graphically depicting this information are presented in Appendix 6-1. Cross-sections prepared from geologic logs of drillholes in the proposed permit and adjacent area are provided in Drawing 6-3. Additional geologic logs are presented in Appendix 5-1 and Appendix 7-4. Additional lithologic characterization is provided in Appendix 7-1.

630 **OPERATION PLAN**

631 **PLAN FOR CASING AND SEALING EXPLORATION HOLES**

Exploration holes and boreholes will be backfilled, plugged, cased, capped, sealed, or otherwise managed to prevent acid or toxic contamination of water resources and to minimize disturbance to the prevailing hydrologic balance. Exploration holes and boreholes will be managed to ensure the safety of people, livestock, fish and wildlife, and machinery.

If any exploration boreholes are to be used as monitoring wells or water wells, these will meet the provisions of R645-301-731

Wells constructed for monitoring groundwater conditions in the proposed Coal Hollow Mine permit and adjacent area, including exploration holes and boreholes used for water wells or monitoring wells, will be designed to prevent contamination of groundwater and surface-water resources and to protect the hydrologic balance. A diagram depicting typical monitoring well construction methods is shown in Drawing 7-11. Monitoring wells will include a protective hydraulic seal immediately above the screened interval, an annular seal plugging the borehole above the hydraulic seal to near the ground surface, and a concrete surface seal extending from the top of the hydraulic seal to the ground surface which is sloped away from the well casing to prevent the entrance of surface flows into the borehole area. Well casings will protrude above the ground surface a sufficient height so as to minimize the potential for the entrance of surface water or other material into the well. A steel surface protector with a locking cover will be installed at monitoring wells to prevent access by unauthorized personnel. Where there is potential for damage to monitoring wells, the wells will be protected through the use of barricades, fences, or other protective devices. These protective devices will be periodically inspected and maintained in good operating conditions. Monitoring wells will be locked in a closed position between uses.

When no longer needed for monitoring or other use approved by the Division upon a finding of no adverse environmental or health and safety effects, or unless approved for transfer as a water well under R645-301-731.100 through R645-301-731.522 and R645-301-731.800, each well will be capped, sealed, backfilled, or otherwise properly managed, as required by the Division in accordance with R645-301-529.400, R645-301-631.100, and R645-301-748. Permanent closure measures will be designed to prevent access to the mine workings by people, livestock, fish and wildlife, machinery and to keep acid or other toxic drainage from entering ground or surface waters.

Permanent closure and abandonment of water wells greater than 30 feet in depth will be in accordance with the requirements of "Administrative Rules for Water Well Drillers", State of Utah, Division of Water Rights or other applicable state regulations. Abandonment of wells will be performed by a licensed water well driller. The wells to be abandoned will be completely filled using neat cement grout, sand cement grout, unhydrated bentonite, or bentonite grout, or other materials approved by the Utah State Engineer's office. Alternatively, the well may be abandoned using a different procedure upon approval from the Utah State Engineer's office.

Abandonment materials will be introduced at the bottom of the well or required sealing interval and placed progressively upward to the top of the well. The casing will be severed a minimum of 2 feet below the ground surface. A minimum of 2 feet of compacted native material will be placed above the abandoned well upon completion.

Within 30 days of the completion of well abandonment procedures, a report will be submitted to the State Engineer by the responsible licensed driller giving data related to the abandonment of the well. This shall include the name of the licensed driller or other person(s) performing abandonment procedures, name of well owner at the time of abandonment, the address or location of the well by section, township, and range, abandonment materials and equipment used, water right or file number covering the well, the final disposition of the well, and the date of completion.

Exploration holes and boreholes will be backfilled, plugged, cased, capped, sealed, or otherwise managed to prevent acid or toxic contamination of water resources and to minimize disturbance to the prevailing hydrologic balance. Exploration holes and boreholes will be managed to ensure the safety of people, livestock, fish and wildlife, and machinery.

If a water well is exposed by coal mining and reclamation operations, it will be permanently closed unless otherwise managed in a manner approved by the Division.

Boreholes will be backfilled to within 1 foot of the land surface with concrete or other materials approved by the Division as necessary to prevent contamination of groundwater or surface-water resources or to protect the prevailing hydrologic balance. The upper approximately 1 foot will be backfilled with native materials to facilitate reclamation (see Drawing 6-11). Exploration holes and boreholes that may be uncovered during mining and reclamation activities will be permanently closed unless approved for water monitoring or otherwise managed in a manner approved by the Division.

632 **SUBSIDENCE MONITORING**

The underground mining has limited extraction with no subsidence. Refer to Appendix 5-9 (Norwest Report) for geotechnical and design information. Do to the design and mining method of underground mining in this plan, no subsidence is projected and no monitoring is planned. ~~The proposed mining in the proposed Coal Hollow Mine permit area does not include underground coal mining activities. This section is not applicable.~~

640 **PERFORMANCE STANDARDS**

641 **ALL EXPLORATION HOLES AND BOREHOLES**

All exploration holes and boreholes will be permanently cased and sealed according to the requirements of R645-301-631.100 and R645-301-631.200.

Exploration holes and boreholes will be backfilled, plugged, cased, capped, sealed, or otherwise managed to prevent acid or toxic contamination of water resources and to minimize disturbance to the prevailing hydrologic balance. Exploration holes and boreholes will be managed to ensure the safety of people, livestock, fish and wildlife, and machinery.

If any exploration boreholes are to be used as monitoring wells or water wells, these will meet the provisions of R645-301-731

Wells constructed for monitoring groundwater conditions in the proposed Coal Hollow Mine permit and adjacent area, including exploration holes and boreholes used for water wells or monitoring wells, will be designed to prevent contamination of groundwater and surface-water resources and to protect the hydrologic balance. A diagram depicting typical monitoring well construction methods is shown in Drawing 7-11. Monitoring wells will include a protective hydraulic seal immediately above the screened interval, an annular seal plugging the borehole above the hydraulic seal to near the ground surface, and a concrete surface seal extending from the top of the hydraulic seal to the ground surface which is sloped away from the well casing to prevent the entrance of surface flows into the borehole area. Well casings will protrude above the ground surface a sufficient height so as to minimize the potential for the entrance of surface water or other material into the well. A steel surface protector with a locking cover will be installed at monitoring wells to prevent access by unauthorized personnel. Where there is potential for damage to monitoring wells, the wells will be protected through the use of barricades, fences, or other protective devices. These protective devices will be periodically inspected and maintained in good operating conditions. Monitoring wells will be locked in a closed position between uses.

When no longer needed for monitoring or other use approved by the Division upon a finding of no adverse environmental or health and safety effects, or unless approved for transfer as a water well under R645-301-731.100 through R645-301-731.522 and R645-301-731.800, each well will be capped, sealed, backfilled, or otherwise properly managed, as required by the Division in accordance with R645-301-529.400, R645-301-631.100, and R645-301-748. Permanent closure measures will be designed to prevent access to the mine workings by people, livestock, fish and wildlife, machinery and to keep acid or other toxic drainage from entering ground or surface waters.

Permanent closure and abandonment of water wells greater than 30 feet in depth will be in accordance with the requirements of “Administrative Rules for Water Well Drillers”, State of Utah, Division of Water Rights or other applicable state regulations. Abandonment of wells will be performed by a licensed water well driller. The wells to be abandoned will be completely filled using neat cement grout, sand cement grout, unhydrated bentonite, or bentonite grout, or other materials approved by the Utah State Engineer’s office. Alternatively, the well may be abandoned using a different procedure upon approval from the Utah State Engineer's office.

Abandonment materials will be introduced at the bottom of the well or required sealing interval and placed progressively upward to the top of the well. The casing will be severed a minimum of 2 feet below the ground surface. A minimum of 2 feet of compacted native material will be placed above the abandoned well upon completion.

Within 30 days of the completion of well abandonment procedures, a report will be submitted to the State Engineer by the responsible licensed driller giving data related to the abandonment of the well. This shall include the name of the licensed driller or other person(s) performing abandonment procedures, name of well owner at the time of abandonment, the address or location of the well by section, township, and range, abandonment materials and equipment used, water right or file number covering the well, the final disposition of the well, and the date of completion.

Exploration holes and boreholes will be backfilled, plugged, cased, capped, sealed, or otherwise managed to prevent acid or toxic contamination of water resources and to minimize disturbance to the prevailing hydrologic balance. Exploration holes and boreholes will be managed to ensure the safety of people, livestock, fish and wildlife, and machinery.

If a water well is exposed by coal mining and reclamation operations, it will be permanently closed unless otherwise managed in a manner approved by the Division.

Boreholes will be backfilled to within 1 foot of the land surface with concrete or other materials approved by the Division as necessary to prevent contamination of groundwater or surface-water resources or to protect the prevailing hydrologic balance. The upper approximately 1 foot will be backfilled with native materials to facilitate reclamation (see Drawing 6-11). Exploration holes and boreholes that may be uncovered during mining and reclamation activities will be permanently closed unless approved for water monitoring or otherwise managed in a manner approved by the Division.

642 **MONUMENTS AND SURFACE MARKERS**

All monuments and surface markers used as subsidence monitoring points and identified under R645-301-632.200 will be reclaimed in accordance with R645-301-521.210.

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Doelling, H.H., 1972, Alton Coal Field, *in* Utah Geological and Mineralogical Survey, Southwestern Utah coal fields: Alton, Kaiparowits Plateau and Kolob-Harmony, Monograph Series No. 1, 333 p.

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R645-301-300

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728 PROBABLE HYDROLOGIC CONSEQUENCES (PHC) DETERMINATION

This section describes the probable hydrologic consequences of surface coal mining in the proposed Coal Hollow Mine permit area. This determination is based on data presented herein and on information provided in Appendix 7-1. The probable hydrologic consequences associated with proposed highwall mining activities within the 85.88-acre Dame Lease IBC area are presented in Appendix 7-4. The probable hydrologic consequences associated with the proposed underground mining activities at the Coal Hollow Mine are presented in Appendix 7-15. This mining and reclamation plan has been designed to minimize potential adverse impacts to the hydrologic balance. It should be noted that this PHC and also Appendix 7-1 may be updated periodically as required as additional hydrogeologic information and mining data become available in the future.

728.310 Potential adverse impacts to the hydrologic balance

Other than the possible short-term diminution in discharge rates from alluvial groundwater systems, including the potential short-term diminution of discharge rates from some springs and seeps in Sink Valley, appreciable adverse impacts to the hydrologic balance, either on or off the permit area are not expected to occur. The basis for this determination is discussed below.

As discussed in Section 721 above, minimal groundwater resources exist in the Tropic Shale, which directly overlies the coal reserves in proposed mining areas. Groundwater in the Tropic Shale does not provide measurable baseflow discharge to streams in the area. The lack of appreciable groundwater flow in the Tropic Shale is a result of the poor water transmitting properties of the marine shale unit. Consequently, it is anticipated that little groundwater will be encountered in the Tropic Shale in mining areas. Thus, the potential for adverse impacts to the hydrologic balance resulting from mining through the Tropic Shale in the proposed Coal Hollow Mine permit area is minimal.

Similarly, as described in Section 722 above, groundwater resources in the Dakota Formation underlying the coal seam to be mined are not appreciable. This condition is fundamentally a result of the heterogeneity of the rock strata in the Dakota Formation which impedes the ability of the formation to transmit groundwaters significant distances vertically or horizontally. The presence of the essentially impermeable Tropic Shale on top of the Dakota Formation also minimizes the potential for vertical recharge to the Dakota Formation. Mining operations will remove the overlying Tropic Shale rock strata from the Dakota Formation in addition to the Smirl coal seam deposit at the top of the Dakota Formation in mined areas. However, because the pre-mining hydraulic communication between the Tropic Shale and the underlying Dakota Formation in planned mining areas is believed to be minimal, the removal of the Tropic Shale overburden and Smirl coal seam from the Dakota Formation, followed by the rapid backfilling of pit areas with low-permeability fill materials should not result in adverse impacts to the hydrologic balance in the Dakota Formation (i.e., the post-mining degree of hydraulic communication between the Dakota Formation and the overlying low-permeability backfill material will be similar to that of the pre-mined condition).

It should be noted that the first water-bearing strata underlying the coal seam to be mined in the proposed Coal Hollow Mine permit area from which appreciable quantities of groundwater can be produced is the Navajo Sandstone. The Navajo Sandstone aquifer is of regional significance in that it provides groundwater of good quality to domestic, agricultural, and municipal wells regionally and provides baseflow to springs and streams. The Navajo Sandstone does not crop out in the proposed Coal Hollow Mine permit and adjacent area. The formation is effectively isolated from proposed mining areas by more than 1,000 feet of rock strata of the Dakota and Carmel Formations (which includes large thicknesses of low-permeability shales and siltstones). The Navajo Sandstone aquifer will not be impacted by proposed mining operations. It should be noted that some previously proposed mining operations in the Alton Coal Field have proposed drilling and pumping of large amounts of groundwater from high-capacity production wells in the Navajo Sandstone aquifer for operational use. No such wells are planned in the proposed Coal Hollow Mine permit and adjacent area.

Of primary importance to the hydrologic balance in the proposed Coal Hollow Mine permit and adjacent area are alluvial groundwater systems. As discussed in Section 722 and in Appendix 7-1, alluvial groundwater systems in the area support springs, seeps, diffuse groundwater discharge, and a limited number of wells. The bulk of the alluvial groundwater flux through the area occurs in alluvial sediments that include coarse-grained and finer-grained sediments near the eastern margins of Sink Valley, east of the proposed Coal Hollow Mine permit area. Lesser quantities of alluvial groundwater migrate through finer-grained alluvial sediments (predominantly clays, silts, and sands) in the western portions of Sink Valley and in the Lower Robinson Creek drainage within the proposed Coal Hollow Mine permit area. Discharges from alluvial groundwater systems in Sink Valley do not contribute measurable quantities of baseflow to streams (at least at the surface in the stream channel). Alluvial groundwater systems in the Lower Robinson Creek area are much less extensive than the alluvial groundwater systems in Sink Valley. Other than the emergence of small quantities of alluvial groundwater from the stream banks where the stream channel intersects the alluvial groundwater system, discharge from the alluvial groundwater system as springs or seeps in Lower Robinson Creek is generally not observed. Perched groundwater conditions exist locally in the alluvial groundwater system in the Lower Robinson Creek drainage.

In the general sense, surface coal mining activities in the proposed Coal Hollow Mine permit area have the potential to impact groundwater systems primarily through three mechanisms:

1) Where water-bearing strata in proposed mining areas are mined through, groundwater systems within these strata will obviously be directly intercepted,
2) Where groundwater flow paths through mine openings are interrupted, groundwater flow in down-gradient areas could be diminished, and

3) Where mine openings intercept permeable strata, groundwater resources in up-gradient areas could potentially be diminished if appreciable quantities of groundwater were to be drained from up-gradient areas.

The potential for the occurrence of each of these potential impacts are described in the following.

Direct Interception of Groundwater Resources

As discussed above, groundwater resources in the relatively impermeable Tropic Shale in the proposed permit area are meager. Consequently, it is improbable that direct interception of appreciable groundwater in the Tropic Shale will occur. Additionally, because Tropic Shale groundwater systems generally do not support discharges to springs or provide baseflow to streams, the potential interception of limited quantities of groundwater in the Tropic Shale will not adversely impact the hydrologic balance. Similarly, groundwater resources in the Dakota Formation (including within the Smirl coal seam) are meager. While the Smirl coal seam will be extracted through mining operations, the underlying strata of the Dakota Formation will not be disturbed. Consequently, adverse impacts to groundwater systems in the Dakota Formation through direct interception of groundwater resources are not anticipated.

Alluvial groundwater systems in planned mining areas in the proposed Coal Hollow Mine permit area will be directly intercepted by the mine openings. It is not anticipated that the direct interception of shallow alluvial groundwater will adversely impact the overall hydrologic balance in the region. This is because no substantial springs, seeps or other important groundwater resources have been identified in proposed mine pit areas (Drawing 7-1). In the pre-mining condition, any diffuse groundwater discharge to the ground surface that occurs is primarily lost to evapotranspiration and does not contribute appreciably to the overall hydrologic balance in the area.

Because of the prevailing low-permeabilities of the alluvial sediments within the proposed mine disturbance area, it is unlikely that the direct mining of the alluvial groundwater system within these areas could cause impacts to subirrigation and soil moisture contents in up-gradient areas.

It is considered likely that the average hydraulic conductivity of the placed run-of-mine backfill material will be low. This is because of the pervasiveness of low-permeability, clay-rich materials in the mine overburden and the anisotropic nature of the placed fill material. Consequently, the potential for the migration of appreciable quantities of groundwater through the fill is considered low. ~~However, to minimize the potential for long-term impacts to the alluvial groundwater system in Sink Valley up-gradient of mining areas that could occur as a result of the long-term draining of alluvial groundwater into the pit backfill area, a permanent, engineered low-permeability barrier will be emplaced adjacent to the undisturbed alluvial sediments along the eastern edge of the pit 15 disturbance area. Information and design details for this low-permeability barrier are provided in Appendix 7-10.~~ Accordingly, the potential for impacts to subirrigation and soil moisture in the lands up-gradient of mining areas will be minimized by ~~both~~ the placement of the low-permeability backfill~~, and the emplacement of the low-permeability engineered barrier adjacent to Pit 15~~.

An engineered low-permeability barrier previously planned for the eastern edge of pit 15 will no longer be necessary and will not be constructed. The original purpose of the proposed engineered barrier was to minimize the potential for long-term impacts to the alluvial groundwater system in Sink Valley up-gradient of mining areas that could occur as a result of the long-term draining of alluvial groundwater into the pit backfill area. Because surface (pit) mining in those areas adjacent to the Sink Valley alluvial groundwater systems (pits13, 14, and 15) is no longer planned, such a barrier will not be necessary.

The potential for short-term impacts to subirrigation and soil moisture in the lands up-gradient of proposed mining areas will be minimized through the implementation of the hydrology resource contingency plan described in Appendix 7-9.

Diminution of down-gradient groundwater resources

Where groundwater flow paths that convey groundwater to down-gradient areas exist in areas that will be mined, there is the potential that diminution of down-gradient groundwater resources could occur. In the proposed Coal Hollow Mine permit area, it is considered unlikely that appreciable diminution of down-gradient resources will occur as a result of mining and reclamation activities. The basis of this conclusion is presented below.

Groundwater resources in the Tropic Shale are meager and groundwater flow rates are very slow through the marine shale unit. Groundwater systems in the Tropic Shale do not support appreciable spring or seep discharge nor do they provide measurable baseflow to streams down-gradient of mining areas. Consequently, the potential for adverse impacts to the hydrologic balance as a result of mining through Tropic Shale is considered minimal.

Similarly, groundwater resources in the Dakota Formation are meager. The potential for lateral and vertical migration of groundwater through the formation is limited by the pervasiveness of low-permeability shaley strata in the formation and the lateral discontinuity of permeable strata. Groundwater systems in the Dakota Formation do not support appreciable spring or seep discharge nor do they provide measurable baseflow to streams down gradient of mining areas. Additionally, with the exception of the relatively low-permeability Smirl coal seam located at the top of the formation, groundwater systems in Dakota Formation rock strata below the coal seam will not be disturbed by mining and reclamation activities. Consequently, the potential for adverse impacts to the hydrologic balance as a result of mining through Dakota Formation strata is considered minimal. It should be noted that spring SP-4 discharges at about 1 gpm approximately 1.1 miles south of the proposed Coal Hollow Mine permit area from an apparent fault/fracture system in the Dakota Formation that may be related to the Sink Valley Fault. It is unlikely that appreciable migration of groundwater through the Sink Valley

Fault system in the relatively impermeable Tropic Shale or shallow alluvium in the proposed Coal Hollow Mine permit area occurs. Consequently, it is considered unlikely that mining and reclamation activities in the proposed Coal Hollow Mine permit area will cause a diminution of discharge from spring SP-4.

Alluvial groundwater systems in proposed mining areas area supported primarily by clays, silts, and fine-grained sands. In proposed mining areas in Sink Valley, appreciable coarse-grained alluvial sediments were not encountered in drill holes or back-hoe excavations. Significant layers of clean coarse alluvium, which could rapidly convey significant amounts of groundwater, were likewise not observed. The results of slug testing performed on wells in and adjacent to proposed mining areas likewise suggest that the potential for rapid migration of groundwaters through alluvial sediments in proposed mining areas is low (Tables 7-8 and 7-9). These data and observations suggest that the flux of groundwater migrating through the alluvial sediments in proposed mining areas in Sink Valley (that could support down-gradient groundwater systems) is not large. Much of the groundwater migrating through the alluvial sediments in proposed mining areas (in the East ¼ of Section 30, T39S, R5W) likely leaves the groundwater system through diffuse discharge to the land surface and is lost evapotranspiration and does not contribute to the overall hydrologic balance in the area. In Sink Valley, a preferential pathway for alluvial groundwaters through deep coarse-grained alluvial sediments likely exists along the east side of Sink Valley. While the thickness of the alluvium in proposed mining areas in Sink Valley generally does not exceed 50 feet (and in many locations is much less), the alluvial sediments along the eastern side of Sink Valley adjacent to proposed mining areas range from about 120 to 140 feet. Of the total flux of groundwater through the alluvial groundwater systems in Sink Valley, most of the flux is likely through this coarse-grained portion of the system. The percentage of the total flux that migrates through clayey and silty alluvial sediments in proposed mining areas along the western flanks of Sink Valley is likely much less.

It should be noted that highly permeable strata were encountered from about 60 to 75 feet depth just above the bedrock interface at the SS well cluster (monitoring well SS-75; Table 7-2). This well is screened in an area of burned or eroded coal (the coal is absent) and consequently, mining will not occur at this location. The coal seam is present at the nearby C9 cluster area. Were mining operations to intercept this highly permeable zone, substantial groundwater inflows into the mine openings could occur. Consequently, prior to surface mining in this area, the boundary between the competent coal seam and the area of burned or eroded coal will be more precisely defined by drilling or other suitable techniques such that mine openings can be designed to avoid these areas of potentially large groundwater inflows.

As discussed in Section 722 above, alluvial groundwater from Sink Valley discharges to several springs and seeps and as diffuse discharge to the ground surface in the northwest ¼ of Section 32, T39S, R5W (see Drawing 7-4; groundwater discharge area B). This groundwater discharge is likely a result of the constriction in Sink Valley in this area and the corresponding decrease in the cross-sectional area of the alluvial sediments in the valley, which forces groundwater to discharge at the surface. Most of the groundwater discharge in this area is likely derived from the up-gradient alluvial groundwater systems in the eastern portion of the valley (i.e., the coarse-grained portion of the alluvial groundwater system), which is situated east of the proposed Coal Hollow Mine permit area. This conclusion is based on 1) the substantially larger cross-sectional area of the alluvium in the deeper eastern portion of the valley relative to that in proposed mining areas near the western margins of the valley, 2) the higher hydraulic conductivity of the sediments in the coarse-grained part of the alluvial system, and 3) the lack of other apparent discharge mechanisms for the coarse-grained system further downstream in Sink Valley Wash (i.e., there are no significant alluvial springs or seeps further downstream in Sink Valley Wash and the system apparently does not contribute measurable baseflow to Sink Valley Wash further downstream (at least at the surface in the stream channel, as evidenced by the lack of baseflow in the wash monitored at SW-9).

Because most of the alluvial groundwater discharge supporting springs and seeps in this area is likely not derived from groundwater systems that underlie planned mining areas in the proposed Coal Hollow Mine permit area, it is considered unlikely that discharges from the springs and seeps in northwest ¼ of Section 32 T39S, R5W will be appreciably diminished as a result of the proposed mining and reclamation activities. While considered unlikely, some temporary impacts to discharge rates from springs and seeps in this area are possible. In particular, it should be noted that mining in the southernmost portions of the proposed Coal Hollow Mine permit area has a somewhat greater potential to decrease groundwater discharge rates at spring SP-6, which is located about 600 feet below the southernmost proposed mining areas (Drawing 7-2). SP-6 is an alluvial seep which has been impounded with an earthen dam from which measurable discharge is generally not present.

It is critical to note that individual mine pits in this area will remain open for short lengths of time, generally no more than about 60 to 120 days (measured from the time the mining of the pit is completed to the time the pit is backfilled). Mining operations in the vicinity near the alluvial groundwater discharge area in the northwest ¼ of Section 32 T39S, R5W are planned to be completed in about 1 year. Thus, any potential impacts to discharge rates from down-gradient groundwater systems will be short-lived. Following the backfilling and reclamation of mine openings, the potential for interception or re-routing of alluvial groundwater away from the groundwater discharge area in northwest ¼ of Section 32 T39S, R5W will be negligible. As stated above, most of the flux through the Sink Valley alluvial groundwater system that supports springs and seeps in the area occurs in the eastern portion of the valley, which will not be impacted by mining and reclamation activities. Consequently, long-term impacts to discharge rates from springs and seeps in this area are not anticipated. It should also be noted that if increased quantities of groundwater were to be encountered in mine workings in lower Sink Valley such that the water would need to be discharged to surface drainages, the mine water will ultimately be discharged to the Sink Valley Wash drainage (i.e., the water will remain in its drainage basin).

Alluvial groundwater systems in the Lower Robinson Creek area are much less extensive than the alluvial groundwater system in Sink Valley. Perched groundwater conditions exist locally in the alluvial groundwater system in the Lower Robinson Creek drainage. Other than the re-emergence of alluvial groundwater flowing beneath the Lower Robinson Creek stream channel where the stream channel exists directly on bedrock substrate, discharges from the alluvial groundwater system as springs or seeps in Lower Robinson Creek are not observed. Consequently, mining operations in the Lower Robinson Creek drainage will likely not result in diminution of down-gradient groundwater resources.

It should be noted that the proposed Coal Hollow Mine plan calls for the temporary diversion of a reach of the Lower Robinson Creek stream channel approximately 2,000 feet in length in the southeast ¼ of Section 19, T39S, R5W. Details of the proposed diversion are given in Chapter 5, Section 527.220 of this MRP. If this action results in diminution of groundwater or surface-water resources, where required a suitable mitigation for this potential impact will be designed and implemented in consultation with the Division of Oil, Gas and Mining.

If any Utah State appropriated water rights are impacted by mining and reclamation operations in the proposed Coal Hollow Mine, these will be replaced according to all applicable Utah State laws and regulations using the designated water replacement source described in Section 727 above.

Draining of up-gradient groundwater resources

Where surface mining occurs adjacent to up-gradient groundwater systems, there is a potential that draining of groundwater from the up-gradient groundwater system into the mine voids could occur. This condition could occur if a sufficiently large and permeable stratum were to be intercepted that is in good hydraulic communication with the up-gradient groundwater system through which appreciable quantities of water could be transmitted.

To more fully evaluate the potential for draining of up-gradient groundwater resources, a field investigation was performed during the winter of 2006-2007 that was designed to facilitate the characterization of the alluvial groundwater system in the proposed Coal Hollow Mine permit and adjacent area. Specifically, this program was designed 1) to better define the vertical and lateral extent of permeable, coarse-grained sediments in the alluvial groundwater system, 2) to characterize the water bearing and water transmitting properties of alluvial sediments, and 3) to evaluate the degree of hydraulic communication between the coarse-grained portion of the alluvial system in Sink Valley and the clayey alluvial sediments in proposed mining areas.

This field investigation included 1) the drilling and installation of 30 monitoring wells, 2) the performance of a 28-hour pumping and recovery test on the alluvial testing production well Y-61 (which is a 6.625-inch well constructed in 1980 as part of a previous coal mining application for groundwater pumping for alluvial aquifer testing) with contemporaneous measuring of water levels in the monitoring well network and contemporaneous measuring of spring discharge rates at three alluvial springs, and 3) the slug testing of 20 monitoring wells to determine approximate values of hydraulic conductivity. The results of the field investigation including analysis of the data collected in the investigation are presented in Appendix 7-1 and are summarized below.

Other than occasional pebbles or small rocks, coarse-grained sediments (i.e., gravels and coarse sands) were not encountered in the drilling of wells along the eastern margins of proposed mining areas in Sink Valley (C1, C2, C3, and C4 well clusters). (It should be noted that the C2 well cluster is located west of the eastern limit of the mine disturbance. The mine openings will intercept the C2 well cluster and the area to the east to locations west of well Y-102). Rather, the sediments encountered in the drilling of these wells were dominated by clays and silts with subordinate amounts of fine-grained sand. Similarly, coarse-grained deposits were not encountered in well clusters C6, C7, C8, and C9. There was no indication during drilling of any appreciable thickness of highly permeable strata through which groundwater could rapidly be transmitted (although it should be noted that the presence of thin sand layers are difficult to identify in wet auger drilling returns). Similarly, appreciable amounts of high-permeability coarse-grained alluvial sediments were not noted in alluvial sediments investigated in backhoe excavated pits and erosional escarpments in Sink Valley.

The hydraulic heads measured in alluvial monitoring wells near proposed mining areas in Sink Valley (C2, C3, C4, C7, C8, and C9) did not indicate artesian pressures. Rather, marked upward or downward vertical hydraulic gradients were not observed in any of these areas and water levels were consistently within several feet of the ground surface.

The results of pump testing in the alluvial groundwater system demonstrate that the springs in the northwest ¼ of Section 29, T39S, R5W are in direct hydraulic communication with the coarse-grained alluvial groundwater system in which the pumping well Y-61 is screened. Discharge rates (or water levels at Sorensen Spring) measured at each of the four springs (SP-8, SP-14, SP-20, and Sorensen spring) monitored during the 28-hour pumping test responded to pumping at the well. Monitoring wells at clusters C2, C3, and C4 near the easternmost proposed mining areas also showed small, muted responses, with declines measured in water levels during the 28-hour test ranging from about 0.05 to 0.10 feet. Other monitoring wells in proposed mining areas did not respond measurably to pumping at Y-61. It should be noted that after the pumping well was turned off at the end of the 28-hour pumping test, spring discharge rates and water levels in alluvial monitoring wells recovered to approximate pre-testing levels.

The results of slug testing of wells in the proposed Coal Hollow Mine and adjacent area are presented in Table 7-8. Using these hydraulic conductivity values together with measured thicknesses of saturated alluvial sediments determined during drilling, and hydraulic gradient values determined from water levels measured in monitoring wells, rates of estimated groundwater inflows to mine openings have been calculated using Darcy's Law (Table 7-9).

Darcy's Law may be expressed as.

$Q = KIA$

Where	Q	=	groundwater discharge rate
	K	=	hydraulic conductivity
	I	=	hydraulic gradient
	A	=	cross-sectional area

The values listed in Table 7-9 are reported as inflow rates per 100 lineal feet of mine openings oriented perpendicular to the groundwater flow direction. Calculations at individual locations are adjusted for the thickness of the saturated alluvium at that location. For all calculations in Table 7-9, a gradient of 0.10 has been used, which is considered a conservative estimate for the alluvial groundwater system in the vicinity of the planned Coal Hollow Mine workings. It is important to note that while values for saturated aquifer thickness and local hydraulic gradient in the alluvial groundwater system can be determined relatively precisely, hydraulic conductivity values determined from slug testing methods are generally considered as order-of-magnitude estimates. Consequently, the information from Table 7-9 should be used for general purposes only. The estimated groundwater inflow rates presented in Table 7-9 suggest that copious, unmanageable amounts of alluvial groundwater will likely not be encountered. It should be noted, however, that alluvial sediments located east of the C2 well cluster may contain coarser grained sediments similar to those intercepted in well Y-102. Special mining protocols will be employed (See Appendix 7-9) when mining in this area (pit15; see Section 728.333) to minimize the potential for interception of large groundwater inflows.

As described in Appendix 7-11, Table 7-9 has been updated to reflect the current pit mine-inflow conditions in the Pit #2 and adjacent areas.

As surface mining operations advance toward the alluvial groundwater discharge area in the northwest ¼ of Section 29, T39S, R5W (See Drawing 7-4; groundwater discharge area A), the information in Table 7-9 suggests that groundwater inflow rates in this area will be modest, generally on the order of a few tens of gallons per minute or less per 100 lineal feet of mine opening. However, it should be noted that, as discussed above, if mine openings in this area were to intersect a substantial thickness of coarse-grained alluvial material that was in good hydraulic communication with the coarse-grained alluvial system located along the eastern margins of Sink Valley, substantially greater rates of groundwater inflow could occur. Based on the information in Tables 7-8 and 7-9, this is not considered likely.

As mining operations advance toward the alluvial groundwater discharge area in the northwest ¼ of Section 29, T39S, R5W (See Drawing 7-4; groundwater discharge area A) and groundwater discharge from up-gradient alluvial groundwater systems occurs, there is the potential that discharge rates from alluvial springs in this area could be diminished. The magnitude of this potential impact will be largely dependent on the drainage rate and volume of groundwater that may be drained from the up-gradient alluvial groundwater system.

The potential for diminution of discharge from alluvial springs near proposed mining areas near the northwest ¼ of Section 29, T39S, R5W will be minimized because:

1) As mining progresses toward the groundwater discharge area in the northwest ¼ of Section 29, T39S, R5W (see Drawing 7-4, groundwater discharge area A), groundwater inflows into mine openings and discharge rates from the nearby alluvial springs will be closely monitored. If groundwater inflow rates into mine openings are excessive, where necessary Alton Coal Development, LLC will use a suitable technique to minimize groundwater inflow rates into the mine. These techniques may include the use of bentonite or natural clay filled cutoff walls or other means where appropriate to isolate and protect groundwater resources up-gradient of mining activities, and

2) Individual mine pits in the proposed Coal Hollow Mine will remain open for short lengths of time, generally no more than about 60 to 120 days (measured from the time the mining of the pit is completed to the time the pit is backfilled). Consequently, any potential impacts to spring discharge rates in the alluvial groundwater system in this area will likely be short-lived. Because the alluvial groundwater recharge areas are located well up-gradient of proposed mining areas (mountain-front recharge) and will not be impacted, recharge to the alluvial system should continue uninterrupted, it is anticipated that water levels in the artesian groundwater system should recover from any mining-related declines in hydraulic head subsequent to the completion of mining in the area.

Groundwater discharge from the springs in the northwest ¼ of Section 29, T39S, R5W (See Drawing 7-4; groundwater discharge area A) do not contribute any measurable baseflow discharge to streams in the area. This conclusion is based on the lack of any baseflow discharge in streams down-gradient of this area in Sink Valley (see monitoring data for SW-6 and SW-9). Rather, most of this discharge is likely ultimately lost to evapotranspiration as the water migrates across the low-permeability, near-surface clayey sediments in Sink Valley. Consequently, the potential temporary diminution of discharge from alluvial springs in the northwest ¼ of Section 29, T39S, R5W would not result in appreciable adverse impacts to the surrounding hydrologic balance.

It is considered likely that the average hydraulic conductivity of the placed run-of-mine backfill material will be low. This is because of the pervasiveness of low-permeability, clay-rich materials in the mine overburden and the anisotropic nature of the placed fill material. Consequently, the potential for the migration of appreciable quantities of groundwater through the fill is considered low. ~~However, to minimize the potential for long-term impacts to the alluvial groundwater system in Sink Valley up-gradient of mining areas that could occur as a result of the long-term draining of alluvial groundwater into the pit backfill area, a permanent, engineered low-permeability barrier will be emplaced adjacent to the undisturbed alluvial sediments along the eastern edge of the pit 15 disturbance area. Information and design details for this low-permeability barrier are provided in Appendix 7-10. An evaluation of the permanent barrier for pit 15~~

~~has been performed by Mr. Alan O. Taylor of Taylor Geo-Engineering, LLC. Information in the Taylor Geo-Engineering report indicates that the 50-foot wide barrier will prevent any appreciable drainage of alluvial groundwater from the coarse-grained alluvial groundwater system centered east of the permit area into the backfilled pit areas. Laboratory analysis of the Tropic Shale material from which the barrier will be constructed indicates that the compacted shale material will perform adequately to successfully contain the alluvial groundwater. Using this technique, the pit areas will be reclaimed to restore the approximate pre-existing groundwater levels in Sink Valley.~~

Accordingly, the potential for impacts to subirrigation and soil moisture in the lands up-gradient of mining areas will be minimized by ~~both~~ the placement of the low-permeability backfill~~, and the emplacement of the low-permeability engineered barrier adjacent to Pit 15~~.

The potential for short-term impacts to subirrigation and soil moisture in the lands up-gradient of proposed mining areas will be minimized through the implementation of the hydrology resource contingency plan described in Appendix 7-9.

The Coal Hollow Mine has designed a plan to divert upgradient alluvial groundwater through an alluvial groundwater interceptor drain system. This plan is designed to minimize the potential for the interception of alluvial groundwater in the mine pit areas and to protect alluvial groundwater quality. The details of this plan are described in the Coal Hollow Mine Alluvial Groundwater Management Plan, which is presented in Appendix 7-9.

If any Utah State appropriated water rights are impacted by mining and reclamation operations in the proposed Coal Hollow Mine, these will be replaced according to all applicable Utah State laws and regulations using the designated water replacement source described in Section 727 above.

728.320 Presence of acid-forming or toxic-forming materials

Chemical information on the acid- and toxic-forming potential of earth materials naturally present in the proposed permit area are presented in Appendix 6-2. Chemical information on the low-sulfur Smirl coal seam proposed for mining is presented in Appendix 6-1 (confidential binder). Based on laboratory analytical data, it is apparent that acid-forming and toxic-forming materials that could result in the contamination of surface-water or groundwater supplies in the proposed Coal Hollow Mine permit and adjacent area are generally not present.

Total selenium (with a 5 mg/kg laboratory lower detection limit) was not detected in any of the samples from the proposed Coal Hollow Mine permit area. Water-extractable selenium concentrations were also generally low (see Section 728.332 below). Likewise, concentrations of water-extractable boron were also low, being less than 3 mg/kg in all samples analyzed. The pH of groundwaters in and around the proposed Coal Hollow Mine permit area are moderately alkaline (UDOGM, 2007). Data in

Appendix 6-2 likewise indicate moderately alkaline conditions in sediments in the proposed permit area. The solubility of dissolved trace metals is usually limited in waters with alkaline pH conditions. Consequently, high concentrations of these metal constituents in groundwaters and surface waters with elevated pH levels are not anticipated. Additionally, most of the materials that will be handled as part of mining and reclamation activities in the proposed Coal Hollow Mine area are of low hydraulic conductivity (i.e. clays, silts, shales, siltstones, claystones, etc.). Consequently, it is anticipated that groundwater seepage volumes through low-permeability backfill and reclaimed land surfaces in reclaimed mine pit areas and excess spoils storage areas will not be large. Additionally, reclaimed areas will be regraded, sloped, and otherwise managed to minimize the potential for land erosion, to restore approximate surface-water drainage patterns, and also to minimize the potential for ponding of surface waters on reclaimed areas (other than "roughening" or "gouging" of some areas to enhance reclamation). Thus, the potential for interactions between large amounts of disturbed earth materials and groundwaters and surface waters, which could result in leaching of chemical constituents into groundwater and surface-water resources, will be minimized.

Additionally, the mining plan calls for the emplacement of 40 inches of suitable cover material over backfilled areas made up of material types which could appreciably impact vegetation (materials with elevated SAR ratios or other physical or chemical characteristics that could adversely impact vegetation).

The neutralization potential greatly exceeded the acid potential in all overburden and underburden samples analyzed, with the neutralization potential commonly exceeding the acid potential by many times, suggesting that acid-mine-drainage will not be a concern at the proposed Coal Hollow Mine (see Section 728.332 below for a further discussion) Acid-forming materials in western coal mine environments often consist of sulfide minerals, commonly including pyrite and marcasite, which, when exposed to air and water, are oxidized causing the liberation of H^+ ions (acid) into the water. Oxidation of sulfide minerals may occur in limited amounts in the mine pits where oxygenated water encounters sulfide minerals. However, the acid produced by pyrite oxidation is quickly consumed by dissolution of abundant, naturally occurring carbonate minerals (Appendix 6-2). Dissolved iron is readily precipitated as iron-hydroxide in well aerated waters, and consequently excess iron is not anticipated in mine discharge water.

Other acid-forming materials or toxic-forming materials have not been identified in significant concentrations nor are such suspected to exist in materials to be disturbed by mining.

Because of the overall low-permeability of the rock strata and sediments surrounding the mine workings (primarily the shales and claystones of the lower Tropic Shale), the potential for seepage of mine water outward into adjacent stratigraphic horizons is low. Additionally, because the floors of the mine pits need to be accessible in order to extract the coal, the mining operations will be carried out in such a manner that the accumulation of large amounts of water in the mine pits will be avoided.

728.331 Sediment yield from the disturbed area.

Erosion from disturbed areas will be minimized through the use of silt fences and other sediment control devices. Surface runoff occurring on disturbed areas will be collected and treated as necessary to remove suspended matter. Four diversion ditches along with four sediment impoundments are proposed for the permit area. In addition, miscellaneous controls such as silt fence and berms are also proposed for specific areas. The proposed locations for these structures are shown on Drawing 5-3. Details associated with these structures can be viewed on Drawings 5-25 through 5-34 and Appendix 5-2.

The smallest practicable area, consistent with reasonable and safe mine operational practices will be disturbed at any one time during the mining operation and reclamation phases. This will be accomplished through progressive backfilling, grading, and prompt revegetation of disturbed areas. The backfilled material will be stabilized by grading to promote a reduction of the rate and volume of runoff in accordance with the applicable requirements. The excess spoil and fill above approximate original contour will be graded to a maximum 3h:1v slope and revegetated to minimize erosion.

Cut ditches will be established on the shoulders of all primary roads to control drainage and erosion. Cut and fill slopes along the primary roads will be minimal and are not expected to cause significant erosion. In locations where there are culvert crossings (i.e. Lower Robinson Creek), the fills slopes will be stabilized by utilizing standard methods such as grass matting or straw wattles. The location and details for roads can be viewed on Drawings 5-3 and 5-22 through 5-24.

Through the implementation of these sediment control measures, it is anticipated that sediment yield from disturbed areas in the proposed Coal Hollow Mine permit area will be minimized.

728.332 Impacts to important water quality parameters

As discussed above, appreciable quantities of groundwater are not anticipated to be intercepted in the Tropic Shale overlying proposed mining areas. Consequently, discharge of Tropic Shale groundwaters from mining areas is not anticipated. Because of the very low hydraulic conductivity of the marine Tropic Shale unit which immediately overlies the coal in proposed mining areas, the lateral migration of appreciable amounts of groundwater outward from proposed mine pit areas is not anticipated. Therefore, no impacts to important water quality parameters in surrounding groundwater and surface-water resources that could result from the interception of Tropic Shale groundwaters are anticipated.

Similarly, appreciable quantities of groundwater are not expected to emanate from the Dakota Formation in the mine floor into the mine openings. This conclusion is based on the fact that 1) vertical and horizontal groundwater flow in the Dakota Formation is impeded by the presence of low-permeability shales that encase the interbedded lenticular sandstone strata in the formation (i.e., the formation is not a good aquifer), 2) appreciable natural discharge from the Dakota Formation in the surrounding area to springs or streams is not observed, supporting the conclusion that the natural flux of groundwater through the formation is meager, and 3) mining will commence near the truncated up-dip end of the formation, minimizing the potential for elevated hydraulic head in the Dakota Formation. The results of slug testing performed on wells screened in the Smirl coal seam indicate relatively low values of hydraulic conductivity for the coal seam (Table 7-8). In much of the proposed mining area, the coal seam is dry. Thus, large inflows of groundwater from the coal seam into mine workings are not anticipated. Likewise, the potential for seepage out of mine pits through the coal seam is minimal. Consequently, impacts to important water-quality parameters in the Dakota Formation potentially resulting from mining operations are not anticipated, nor are impacts to important water-quality parameters in surrounding groundwater and surface-water systems anticipated as a result of interactions with intercepted Dakota Formation groundwater.

The water quality of groundwaters in the alluvial groundwater system up-gradient of mining operations will likely not be impacted by mining and reclamation activities in the proposed Coal Hollow Mine. Were alluvial groundwaters intercepted by mine openings allowed to flow into the mine pits, there would be the potential for substantially increased TDS concentrations as the water interacts with the marine Tropic Shale and the Smirl coal seam. This occurrence will be avoided.

As groundwater naturally migrates through the shallow, fine-grained alluvial sediments in the proposed Coal Hollow Mine permit and adjacent area (most evident in Sink Valley), the quality of the water is naturally degraded (see Appendix 7-1). In the distal portions of Sink Valley, most notably concentrations of magnesium, sulfate, and bicarbonate are elevated in the alluvial groundwater.

The potential for TDS increases associated with interaction of waters with the Tropic Shale can be minimized by avoiding contact where practical between water sources and earth materials containing soluble minerals. Where possible, groundwater that will be encountered in alluvial sediments along the margins of mine pit areas will be routed through pipes, ditches or other conveyance methods away from mining areas via gravity drainage so as to prevent or minimize the potential for interaction with sediments disturbed by mining operations (including contact with the mined coal seam). If diverted alluvial groundwater were allowed to interact extensively with the Tropic Shale bedrock or Tropic Shale-derived alluvial sediments, similar increases in magnesium, sulfate, bicarbonate, and TDS concentrations would be anticipated. Consequently, where intercepted groundwaters will be routed around disturbed areas through pipes or well-constructed and maintained ditches, it is anticipated that detrimental impacts to important water quality parameters in these waters will be minimal.

The pumping and discharging of mine water from mine pits at the proposed Coal Hollow Mine permit area is not anticipated. The impoundment of substantial quantities of water within the mine pits would likely result in degradation of groundwater quality and is also not compatible with the proposed surface mining technique (the coal extraction operations occur at the bottom of the mine pit and thus they cannot be performed in flooded mine pits). As discussed above, the only likely foreseeable source of appreciable quantities of groundwater is from the alluvial groundwater systems overlying the low-permeability Tropic Shale in proposed mining areas. Where this alluvial groundwater is encountered in mining areas, it will be diverted away from mine workings prior to significant interaction with sediments in disturbed areas. Any discharge from the mine pits that does occur will be regulated under a Utah UPDES discharge permit.

Acid mine drainage is not anticipated at the proposed Coal Hollow Mine permit area. This is due primarily to the relatively low sulfur content of the coal (see Appendix 6-1; confidential binder) and rock strata in the permit and adjacent area, and to the pervasiveness of carbonate minerals in the soil and rock strata which neutralize the acidity of the water if it occurs. If sulfide mineral oxidation and subsequent acid neutralization via carbonate dissolution were to occur, increases in TDS, calcium, magnesium, sulfate, and bicarbonate concentrations (and possibly also sodium concentrations via ion-exchange with calcium or magnesium on exchangeable clays) would be anticipated.

An analysis of the acid/base potential of samples collected from the overburden and underburden in the proposed mining area indicates that acid mine drainage will be unlikely to occur at the Coal Hollow Mine. The results of laboratory analysis of the acid/base potential of samples collected from the overburden, underburden, and Smirl coal zone are presented in Appendix 6-2. None of the overburden or underburden samples were acid forming, as each of the intervals sampled showed excess neutralization potential. Taken as a whole, the un-weighted composite average acid/base potential of the 57 overburden and underburden samples indicates a net neutralization potential of 174 tons per kiloton. The neutralization potential of the composite overburden/underburden (180 tons per kiloton) exceeds the acid potential (5.5 tons per kiloton) by more than 32 times. A general consensus opinion mentioned by the National Mine Land Reclamation Center (OSM, 1998) is that if the net acid/base potential exceeds 30 tons per kiloton, and the ratio of neutralization potential to acid potential exceeds two, then *alkaline* water will be generated and acid mine drainage will not occur. The acid/base characteristics of composite overburden and underburden in the Coal Hollow Mine area greatly exceed both of these two criteria, suggesting the strong likelihood that acid mine drainage will not be an issue at the Coal Hollow Mine.

Because of the net neutralization potential of the composite overburden/underburden in the Coal Hollow Mine area described above, the pH values of groundwater in fill areas will likely be neutral to alkaline. Accordingly, the solubility of dissolved trace metal species in the alkaline water will likely be low. Consequently, the potential for the mobilization and transport of trace metals in groundwater in the fill will likely also be low. Concentrations of total selenium, water extractable selenium, water extractable boron and other important chemical species in the overburden samples from the Coal Hollow Mine area are generally low. Water extractable selenium concentrations in the analyzed Dakota Formation underburden samples range from 0.05 to 0.2 mg/kg (see Appendix 6-2). Water extractable boron concentrations in the Dakota Formation underburden in a single location (CH-08; 6.5 mg/kg) marginally exceed the Division standard of 5 mg/kg. The limited quantities of material containing water extractable selenium and boron in these concentration ranges in backfill materials are not anticipated to result in appreciably elevated selenium or boron concentrations in groundwater or surface water supplies. Because the hydraulic conductivity of the composite run-of-mine backfill material (which will be rich with clays, silts, and shale) is expected to be low, the flux of groundwater that might migrate through the backfilled pit areas is likely to be low. Additionally, the reclaimed land surface will be graded to promote runoff of surface waters overlying backfilled areas, thus minimizing the potential for infiltration of surface waters into backfilled areas. Consequently, the potential for acid mine drainage or toxic drainage from backfilled areas to surrounding groundwater and surface-water supplies will be minimized.

As outlined in the topsoil and subsoil sampling plan in Chapter 2 of this MRP, materials with poor quality SAR, elevated selenium or boron concentrations, or poor pH as defined by Division guidelines will not be placed in the upper four feet of the reclaimed surface. These materials will also not be placed in the backfill within the top four feet of ephemeral drainages with 100 year flood plains, or in the top four feet in surface water impoundments, or in the top four feet in intermittent or perennial drainages including 100 year flood plains as outlined in the Division guidelines. Materials placed in the top four feet will be sampled to ensure that only suitable materials are placed in the top four feet of the reclaimed surface.

It is noteworthy that in the neighboring state of Wyoming, a water extractable selenium standard of 0.3 mg/kg is considered suitable for topsoil and topsoil substitutes, with concentrations ranging from 0.3 to 0.8 mg/kg being considered marginally suitable for topsoil and topsoil substitute.

As is typical with coal seams regionally, laboratory analyses of coal samples from the Coal Hollow Mine area indicates that there is a net acid forming potential in the coals of the Smirl coal zone (see Appendix 6-2). However, the mining plans call for the mining and removal of 95% of the total coal seam thickness from mining areas, leaving only minor amounts of coal in backfilled areas. Consequently, the potential contribution to the overall acid/base potential of the composite backfill material would be small. Assuming a worst-case-scenario – that all the coal would be retained in the backfill material – the calculated acid/base potential of the composite backfill material is still well within the limits suggested by OSM (1998) to indicate that alkaline discharge without acid mine drainage would be likely.

As described in Chapter 5, Section 532, surface runoff that occurs on disturbed areas will be treated through sedimentation ponds or other sediment-control devices and particulate matter will be allowed to settle prior to the discharging of the water to the receiving water, thus controlling suspended solids concentrations.

At any mining operation there is the potential for contamination of soils, surface-water and groundwater resources resulting from the spillage of hydrocarbons. Diesel fuels, oils, greases, and other hydrocarbons products will be stored and used at the mine site for a variety of purposes. A spill Prevention Control and Countermeasure Plan will be implemented that will help minimize any potential detrimental impacts to the environments.

Spill control kits will be provided on all mining equipment and personnel will be trained to properly control spills and dispose of any contaminated soils in an appropriate manner.

Based on these findings, it is concluded that the potential for mining and reclamation activities in the proposed Coal Hollow Mine permit area to cause detrimental impacts to important water quality parameters is minimal.

728.333 Flooding or streamflow alteration

As described above, appreciable groundwater inflow from the Tropic Shale and Dakota Formation into mine pits at the proposed Coal Hollow Mine are not anticipated. Appreciable groundwater inflows are anticipated only from the relatively thin, overlying alluvial groundwater systems. The thicknesses of the alluvium adjacent to mine openings in the proposed mining areas is generally less than 40 to 50 feet. The hydraulic conductivities of the predominantly clayey and silty alluvial sediments are low, and consequently, very large or sudden groundwater inflows into mine openings are not anticipated. Where appreciable alluvial groundwater is encountered adjacent to mine openings, it will be routed away from mining areas through ditches or other conveyance mechanisms. Details of the Coal Hollow Mine Alluvial Groundwater Management Plan are provided in Appendix 7-9. Consequently, discharge of mine water from the mine pits is not anticipated. The rates of alluvial groundwater drainage that could occur will likely not be of a magnitude that could potentially cause flooding or streamflow alteration in either the Sink Valley Wash or Lower Robinson Creek drainages.

If excess groundwater were to be encountered during mining operations such that it could not be adequately managed or discharged in compliance with the Utah UPDES discharge permit (which is considered unlikely), Alton Coal Development, LLC may when necessary construct supplemental containment and settlement ponds in which mine discharge waters may be held for treatment (where necessary) and subsequent discharge through UPDES discharge points in compliance with the UPDES discharge permit, minimizing the potential for flooding or streamflow alteration in areas adjacent to mining.

When coal mining near the eastern edge of the Coal Hollow Mine permit area occurs (mine pits 13-15), special measures will be taken to minimize the potential for the interception by the mine openings of large quantities of groundwater from artesian groundwater system in the northwest ¼ of Section 29, T5W, R39S, and to adequately deal with groundwater inflows if such occur. Details of the contingency plan for this occurrence are provided in Appendix 7-9.

When mining operations advance toward the eastern edge of the permit boundary in pit 15, material excavating in the alluvial sediments will be performed incrementally and with caution. As excavation proceeds, if coarse, water-bearing alluvial sediments (gravels) are encountered, overburden removal in that area will be stopped. The excavation equipment operator will recover the exposed gravel zone with local impermeable sediments (abundant in the alluvium in the area) to halt groundwater inflow if possible. The hydrogeologist will be called to the site to access the hydrogeologic conditions. An investigation of the situation will be performed and a suitable work plan will be developed prior to the resumption of overburden removal in that area. The work plan will be designed to minimize the potential for intercepting unacceptably large inflows of groundwater into the mine pits. The work plan will most likely involve trenching in the alluvium in zones up-gradient of the mine pit area and the emplacement of a low-permeability cut-off wall. The cut-off wall would be emplaced in the excavated trench using acceptable native low-permeability materials. The cut-off wall would be designed to isolate the mine openings from the coarse-grained alluvial groundwater system sufficient to decrease mine inflows to acceptable levels (i.e. so as to minimize the potential for detrimental impacts to the hydrologic balance and to minimize the potential for flooding of mine pits or causing flooding or stream alteration).

As a temporary measure to manage any potential large groundwater inflows that may occur in these areas prior to the installation of a suitable up-gradient hydraulic barrier, the intercepted alluvial groundwaters would be routed along mine benches that "daylight" to the natural land surface in areas to the south. The water would be diverted into pond 4 which has an appreciable storage capacity and discharge structure.

It should be noted that the interception of moderate amounts of groundwater from shallow alluvial groundwater systems in these areas is considered likely. Modest inflows of shallow groundwater intercepted by the mine workings in these areas would be manageable and not of significant concern. The objective of the work plan would be to ensure that strong hydrodynamic communication between the coarse-grained artesian alluvial groundwater systems in the eastern portion of Sink Valley with the Coal Hollow Mine workings is not established.

~~To prevent the migration of alluvial groundwater from the coarse-grained alluvial groundwater system centered east of the mine permit area into mine pit backfill areas after the completion of mining, a permanent low-permeability barrier will be constructed along the eastern edge of the pit 15 area. Details of this plan are provided in Appendix 7-10.~~

The rate at which alluvial groundwater will be intercepted by the proposed Coal Hollow Mine will be variable by location and time in permit area. Because of the heterogeneity inherent in most alluvial deposits, the quantifying of precise aquifer parameters in the various mining areas is not straightforward. Additionally, the geometry of the mine openings including the horizontal lengths and heights of mine pit faces adjacent to saturated groundwater systems that are exposed at any point in time are dynamic variables in the surface mining environment. Consequently, precise quantifications of mine groundwater interception rates are not readily obtainable. However, using the estimated mine pit groundwater inflow rates presented as discharge per linear foot of open pit in Table 7-9, it is considered likely that mine interception will be on the order of a few tens of gallons per minute in dry areas and at times when open pit sizes are small, to several hundred gallons per minute in wetter areas and at times when the open pit size is large. It is important to note that inflows into individual pit areas will be short lived, as the individual pits will commonly remain open for a few weeks to a few months.

The reasonably foreseeable maximum quantity of water that could be intercepted by the Coal Hollow Mine is largely a function of the manner in which coal mining operations are conducted in areas where the potential for encountering appreciable groundwater inflows is greatest. If large areas of water-bearing coarse-grained sediments were to be rapidly exposed in mine pit areas, large quantities of water would be anticipated (likely several thousands of gallons per minute). However, as described above, mining operations will be carried out in these areas using the special mining protocols described above. Consequently, large cross-sectional exposures of water-bearing coarse-grained alluvial sediments will not be allowed to be exposed to the mine pits and large inflows of groundwater on that magnitude are not anticipated.

In the unanticipated event that excessive quantities of water were to flow into the mine pits by any mechanism, the water would be pumped from the pits using a suitable pump and piping equipment that will be located on-site at the Coal Hollow Mine for such a contingency. Such water would be managed appropriately as required by all applicable State and Federal regulations. It should be noted that it is not in the mine's interest to allow excessive water to flow into the mine pits. All reasonable efforts will be taken to minimize the potential for flooding of the mine pits (an event that is not considered reasonably foreseeable or probable to occur).

Through the implementation of the above described mining protocols in areas where potentially large groundwater inflows could reasonably be anticipated to occur, the potential for the interception of large quantities of water by the mine is minimized. Consequently, the potential for flooding or streamflow alteration that could occur as a result of intercepting and discharging large quantities of water will be minimized and is considered unlikely.

The principal surface-water drainages in and adjacent to the proposed Coal Hollow Mine permit area are in many locations not stable in their current configurations (see photograph section). Currently, these stream drainages are actively eroding their channels during precipitation events, resulting in down-cutting and entrenchment of stream channels, the formation of unstable near-vertical erosional escarpments adjacent to stream channels (which occasionally spall off into the stream channel), aggressive headward erosion of stream channels and side tributaries, and the transport of large quantities of sediment associated with torrential precipitation events. These processes are currently actively ongoing in the proposed permit and adjacent area and the upper extents of these erosional processes are in many locations migrating upward in stream channels, resulting in increasing lengths of unstable stream channels.

Hereford (2002) suggests that the valley fill alluviation in the southern Colorado Plateau occurred during a long-term decrease in the frequency of large, destructive floods, which ended in about 1880 with the beginning of the historic arroyo cutting. Hereford (2002) further suggests that the shift from deposition to valley entrenchment coincided with the beginning of an episode of the largest floods in the preceding 400-500 years, which was probably caused by an increased recurrence and intensity of flood-producing El Nino Southern Oscillation events beginning at ca. A.D. 1870.

The exact causes of the entrenchment of stream channels and the creation of the numerous arroyos currently in existence in the southwestern United States are not completely understood. Vogt (2008) suggests that three primary factors resulted in the arroyo formation. These factors included 1) changes in climate that produced heavy rainfall, 2) land-use practices such as livestock grazing, and 3) natural cycles of erosion and deposition caused by internal adjustments to the channel system. The temporal coincidence of the causes may have magnified the effect of each factor.

Each of these factors likely contributed to the formation of the entrenched stream drainages and arroyos in the Coal Hollow Project area. Gregory (1917) states that historical evidence indicates that the cutting of Kanab Creek began when a large storm occurred on 29 July 1883, and that unusually large amounts of precipitation were received in 1884-85. In this period the Kanab Creek channel was down-cut by 60 feet and widened by 70 feet for a distance of about 15 miles. The lowering of Kanab Creek may have resulted in a lowering of the local base level and consequent incision of both Sink Valley Wash and Lower Robinson Creek. As suggested by Vogt (2008), other factors, such as the heavy livestock grazing in the local area, which was occurring contemporaneously with the heavy thunderstorm events, likely also contributed to the overall conditions that brought about the stream down-cutting episode in the late 1800s.

While the precise sequence of events and conditions that triggered the arroyo formation and stream entrenchment in the principle surface drainages in and adjacent to the Coal Hollow Project area is not known, it is readily apparent that the principle surface water drainages are not currently in a condition of equilibrium. Stream head-cutting (headward erosion), bank erosion, and spalling of the steep stream channel walls are ongoing processes in the Coal Hollow Project area.

The mining and reclamation plan for the Coal Hollow Mine has been designed to minimize the potential for sediment yield and erosion in the mine permit area. Accordingly, the mining and reclamation plan minimizes the potential for stream channel erosion and instability within the permit area. No mining-related activities are planned that would likely result in a worsening of the current instability of the surface water drainages in the permit and adjacent area.

The Coal Hollow Mine mining and reclamation plan calls for reclamation activities concurrent with mining progression, which results in the smallest disturbed area footprint and minimizes the length of time that the land surface is susceptible to erosion. The plan also calls for soil tackifiers to be used as a temporary soil stabilizer on reclamation areas prior to seeding. Seeded areas will be mulched. Vegetation established in final reclamation areas will minimize the potential for sediment yield and stream erosion in the long term.

The potential for erosion on the planned excess spoils pile will likewise be minimized. The design plans for the excess spoils pile call for the side slopes exceeding 60 feet in height to be constructed with concave slopes to promote slope stability and to minimize the erosion potential. The excess spoils pile will also be revegetated to minimize the erosion potential.

The Lower Robinson Creek reconstruction will likewise be constructed to promote stability and resistance to erosion. Details of the Lower Robinson Creek reconstruction are shown on Drawings 5-20A and 5-21A. The construction of the channel will include riprap of the channel bottom and the inclusion of an inner flood plane to minimize erosion during flooding events. The stream channel will be revegetated to minimize erosion potential. The Lower Robinson Creek reconstruction is designed to leave the drainage in a condition at final bond release that is at least as stable as the current pre-mining condition.

Following reclamation, stream channels will be returned to a stable state to the extent possible given the currently unstable state of natural drainage channels in the area. Stream channels will be designed to withstand anticipated storm events, thus minimizing the potential of flooding in the reclaimed areas.

The overall condition of the land surface and the surface-water drainages within the permit area at final bond release will likely meet or exceed the current pre-mining conditions. However, it should be noted that Alton Coal Development, LLC will have no control over the land management practices and landowner activities that may be implemented on the privately owned lands of the reclaimed Coal Hollow Mine area after final bond release. Accordingly, the degree of erosional stability and overall conditions in the reclaimed lands and stream drainages in the post bond-release period is not in the control of Alton Coal Development, LLC.

The existing principle surface-water drainages adjacent to the proposed Coal Hollow Mine permit area have large discharge capacities (lower Sink Valley Wash below the County Road 136 crossing, Lower Robinson Creek, and Kanab Creek). These drainages periodically convey large amounts of precipitation runoff water associated with torrential precipitation events. The anticipated discharge rates from alluvial groundwater drainage and the maximum reasonably foreseeable amount of mine discharge water that could potentially be required to be discharged from mine pits is much less than that periodically occurring during major torrential precipitation events. The addition of modest amounts of sediment-free water into these stream channels has the potential to cause minor increases in channel erosion. However, the magnitude of this potential impact will likely be small relative to that occurring during torrential precipitation events.

Most precipitation waters falling on disturbed areas will be contained in diversion ditches and routed to sediment impoundments that are designed to impound seasonal water and storms. Sediment control facilities will be designed and constructed to be geotechnically stable. This will minimize the potential for breaches of sediment control structures, which if they occur could result in down-stream flooding and increases in stream erosion and sediment yield. Emergency spillways will be part of the impoundment structures to provide a non-destructive discharge route should capacities ever be exceeded.

Details associated with these structures can be viewed on Drawings 5-25 through 5-34 and Appendix 5-2.

It should be noted that during the startup and construction phase of the mine operation, while the ditches and sediment control ponds are being constructed, temporary silt control measures will be utilized. These measures may include the use of silt fences or other appropriate sediment control measures as necessary.

As shown on Drawing 5-26, there are two sediment impound watershed areas within the mine permit area (Watershed 5 and Watershed 6) from which precipitation runoff water will not be routed through sediment ponds.

Watershed 5 area includes 28 acres near the Sink Valley Wash/Lower Robinson Creek drainage divide. The land surface in Watershed 5 is relatively flat, sloping at about a one percent grade. Because of the flatness of the land surface in Watershed 5, it is not practical to construct ditches to convey water from this area to a sediment pond. Consequently, control of sediment in runoff water from Watershed 5 will be accomplished through the use of a silt fence or other appropriate sediment control measure placed along the western permit boundary adjacent to Watershed 5 (see Drawing 5-26). Precipitation water falling on Watershed 5 will be retained as soil moisture, retained in the lowest portions of the watershed and allowed to evaporate or infiltrate or, after treatment with silt fences or other appropriate sediment control measures, allowed to flow down gradient onto lower lying adjacent areas.

Watershed 6 includes 19 acres located within the permit boundary east of the proposed Lower Robinson Creek reconstruction (see Drawing 5-26). The land surface in this area slopes gently toward the west at an approximately three to four percent grade. The Watershed 6 area will be isolated from a sediment pond by the reconstructed Lower Robinson Creek stream channel. Control of sediment in Watershed 6 will be accomplished through the installation of a silt fence or other appropriate sediment control measure along the margin of the watershed as shown on Drawing 5-26. The soils on the post-mining land surface in Watershed 6 will initially be stabilized with the use of tackifiers. Subsequent revegetation of the land surface in Watershed 6 will minimize the potential for erosion. After treatment with silt fences or other appropriate sediment control measures, precipitation water falling on Watershed 6 will be allowed to flow down-gradient toward adjacent lands or toward the Lower Robinson Creek stream channel.

The potential for flooding or streamflow alteration resulting from mining and reclamation activities at the proposed Coal Hollow Mine permit area is considered minimal.

728.334 Groundwater and surface water availability

Groundwater use in the proposed Coal Hollow Mine permit and adjacent area is generally limited to stock watering and domestic use in Sink Valley. Some limited use of spring discharge water for irrigation has occurred in Sink Valley, although such irrigation is not occurring presently nor has it occurred in at least the past 10 years. The areas of groundwater use in the proposed Coal Hollow Mine permit and adjacent area are located in the northwest ¼ of Section 29, T39S, R5W (see Drawing 7-4; groundwater discharge area A), and in the northwest ¼ of Section 32, T39S, R5W (see Drawing 7-4; groundwater discharge area B). The likely future availability of groundwater in each of these areas is discussed below.

Groundwater discharge area A (Northwest ¼, Section 29, T39S, R5W)

Groundwater use in area A occurs from several alluvial springs and seeps that are used for stock watering and limited domestic use. As described in Section 728.311 above, short-term diminution in discharge rates from springs in northwest ¼ of Section 29, T39S, R5W are possible as mining operations advance toward these springs. This potential impact is associated with the possible drainage of up-gradient alluvial groundwater into mine openings as mining advances toward groundwater discharge area A. Because individual mine pits will typically remain open for less than about 60 to 120 days (measured from the time the mining of the pit is completed to the time the pit is backfilled) before subsequently being backfilled and reclaimed, the potential for long-term drainage of alluvial groundwater into the mine voids is negligible, and thus any potential decreases in alluvial discharge in groundwater discharge area A is anticipated to be short-lived.

If groundwater inflow rates into mine openings in this area are excessive, such that appreciable impacts to the springs and seeps in groundwater discharge area A are likely, where necessary Alton Coal Development, LLC will use a suitable technique to minimize groundwater inflow rates into the mine voids. These techniques may include the use of bentonite or natural clay filled cutoff walls or other means where appropriate to isolate and protect groundwater resources up-gradient of mining activities. Consequently, the potential that groundwater could become unavailable in this area is minimal. Additionally, if alluvial groundwater resources were to become unavailable in this area due to mining and reclamation activities in the proposed Coal Hollow Mine permit area, groundwater will be replaced according to all applicable State laws and regulations using the replacement water source described in Section 727 above. Details of the contingency plan for this occurrence are provided in Appendix 7-9.

~~To prevent the migration of alluvial groundwater from the coarse-grained alluvial groundwater system centered east of the mine permit area into mine pit backfill areas after the completion of mining, a permanent low-permeability barrier will be constructed~~

~~along the eastern edge of the pit 15 area. Details of this plan are provided in Appendix 7-10.~~

It should be noted that the proposed water replacement source is a new well that will produce groundwater from the coarse-grained alluvial groundwater system in Sink Valley. Nearby springs that could potentially be impacted by mining and reclamation activities are supported by the same alluvial groundwater system. However, while modest decreases in the artesian hydraulic pressures in the alluvial groundwater system could potentially result in diminution of spring flows, the new well will be equipped with an electric well pump providing the capability to produce groundwater from the alluvial system even if the hydraulic head in the alluvial groundwater system were to be diminished such that artesian flow conditions temporarily ceased to exist.

Groundwater discharge area B (Northwest ¼, Section 32, T39S, R5W)

Groundwater use in groundwater discharge area B occurs at alluvial springs and seeps located southeast of the proposed Coal Hollow Mine permit area that are used for stock watering and limited domestic use. As described in Section 728.311 above, although some temporary and short-lived diminution in discharge rates from springs in northwest ¼ of Section 29, T39S, R5W is possible, this potential impact is not considered likely.

In the event that alluvial groundwater resources were to become unavailable in this area due to mining and reclamation activities in the proposed Coal Hollow Mine permit area, groundwater will be replaced according to all applicable State laws and regulations using the replacement water source described in Section 727 above.

Surface-water availability

Surface-water use in the proposed Coal Hollow Mine permit and adjacent area occurs in the Sink Valley Wash drainage and in Lower Robinson Creek. Surface waters in the Sink Valley Wash drainage (primarily from Water Canyon via an irrigation diversion and from Swapp Hollow; appreciable discharge in Sink Valley Wash below Section 29 T39S, R5W is usually absent) are utilized for both stock watering and limited irrigation use. Stream water in the Sink Valley Wash drainage is derived from runoff from the adjacent Paunsaugunt Plateau area. Because the surface water in the drainage originates from areas up-gradient areas located large distances from proposed mining areas, and because the stream channel is entirely outside the permit area and will not be impacted by mining and reclamation activities, there is essentially no probability that surface water availability in the Sink Valley Wash drainage could become unavailable as a result of mining and reclamation activities.

Discharge in Lower Robinson Creek immediately above the proposed Coal Hollow Mine permit area typically occurs only in direct response to significant precipitation or snowmelt events. Thus, surface-water availability is currently limited in this drainage prior to any mining activities.

Seepage of alluvial groundwater into the deeply incised lower Robinson Creek stream channel occurs near the contact with the underlying Dakota Formation in the southeast quarter of Section 19, T39S, R5W. This water is likely related to saturated alluvial deposits directly underlying the Robinson Creek stream channel and emerges near where the stream channel intersects the alluvial groundwater system. This seepage of alluvial water is usually about 5 - 10 gpm or less and is routinely monitored at monitoring station SW-5 (Drawing 7-2).

It should be noted that the proposed Coal Hollow Mine plan calls for the permanent diversion of a reach of the Lower Robinson Creek stream channel approximately 2,000 feet in length in the southeast ¼ of Section 19, T39S, R5W. Details of the proposed diversion are given in Chapter 5, Section 527.220 of this MRP. If this action results in diminution of the meager discharge of surface water in the drainage below the planned diversion, where required a suitable mitigation for this potential impact will be designed and implemented in consultation with the Division of Oil, Gas and Mining.

The information presented above suggests that the potential for significant impacts to groundwater and surface-water availability resulting from mining and reclamation activities in the proposed Coal Hollow Mine permit and adjacent systems in the region is low.

728.340 Whether mining and reclamation activity will result in contamination, diminution or interruption of State-appropriated waters

State appropriated water rights in the proposed Coal Hollow Mine permit and adjacent area are shown on Drawing 7-3 and tabulated in Appendix 7-3.

Appropriated groundwaters include alluvial springs and seeps in the northwest ¼ of Section 29, T39S, R5W (groundwater discharge area A), springs and seeps in the northwest ¼ of Section 32, T39S, R5W (groundwater discharge area B). State appropriated surface waters include reaches of Sink Valley Wash east of the proposed Coal Hollow Mine permit area, and reaches of Lower Robinson Creek.

The potential for mining and reclamation activities at the proposed Coal Hollow Mine permit area to result in contamination, diminution or interruption of State-appropriated water in the proposed Coal Hollow Permit and adjacent area are described in detail in Sections 728.310, 728.320, 728.332, and 728.334.

With the possible exception of short-term diminution in discharge rates from springs and seeps in the northwest ¼ of Section 29, T39S, R5W, Contamination, diminution, or interruption of State-appropriated waters in the proposed Coal Hollow Mine permit and adjacent area are not anticipated. It should be noted that if groundwater inflow rates into mine openings in this area are excessive, such that appreciable impacts to the springs and seeps in groundwater discharge area A are likely, where necessary Alton Coal Development, LLC will use a suitable technique to minimize groundwater inflow rates into the mine voids. These techniques may include the use of bentonite or natural clay filled cutoff walls or other means where appropriate to isolate and protect groundwater resources up-gradient of mining activities, minimizing the potential for diminution of discharge rates from these springs.

Additionally, it should be noted that the proposed Coal Hollow Mine plan calls for the temporary diversion of a reach of the Lower Robinson Creek stream channel approximately 2,000 feet in length in the southeast ¼ of Section 19, T39S, R5W. Details of the proposed diversion are given in Chapter 5, Section 527.220 of this MRP. If this action results in diminution of the meager discharge of surface water in the drainage below the planned diversion, where required a suitable mitigation for this potential impact will be designed and implemented in consultation with the Division of Oil, Gas and Mining.

In the event that any State appropriated waters were to be contaminated, diminished, or interrupted due to mining and reclamation activities in the proposed Coal Hollow Mine permit area, groundwater will be replaced according to all applicable State laws and regulations using the replacement water source described in Section 727 above.

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730 **OPERATION PLAN**

Coal mining in the proposed Coal Hollow Mine permit area will occur using surface and underground mining techniques. All coal mining and reclamation operations will be conducted to minimize disturbance to the hydrologic balance within the permit and adjacent areas, to prevent material damage to the hydrologic balance outside the permit area and support approved postmining land uses in accordance with the terms and conditions of the approved permit and the performance standards of R645-301 and R645-302. Operations will be conducted to assure the protection or replacement of water rights in accordance with the terms and conditions of the approved permit and the performance standards of R645-301 and R645-302.

In order to maximize the use and conservation of the coal resource, coal will be recovered using a combination of large hydraulic backhoes or front end loaders and off-road trucks, highwall mining and underground mining equipment. Mined coal will be hauled to a central coal processing area for crushing and placement into a stockpile. Coal from the stockpile will be transferred into a bin and loaded into over the road trucks for transport.

The plan, with Drawings, cross sections, narrative, descriptions, and calculations indicates how the relevant requirements will be met. The lands subject to coal mining and reclamation operations over the estimated life of the operations are identified and briefly described. All appropriate information is located in the subsequent sections and Drawings 5-1 through 5-39 and Appendices A5-1 through A5-3.

731 **GENERAL REQUIREMENTS**

Operations will be conducted to assure protection or replacement of water rights in accordance with the terms and conditions of the approved permit and the performance standards of R645-301 and R645-302.

Groundwater and Surface-Water Protection

To protect the hydrologic balance, coal mining and reclamation operations will be conducted to handle earth materials and runoff in a manner that minimizes acid, toxic, or other harmful infiltration to the groundwater system. Additionally, excavations, and disturbances will be managed to prevent or control discharges of pollutants to the groundwater.

Products including chemicals, fuels, and oils used in the mining process will be stored and used in a manner that minimizes the potential for these products entering groundwater systems. Concrete oil and fuel containments will be constructed as shown on Drawings 5-3 and 5-8.

A facilities spill plan for the Coal Hollow Mine is provided in Appendix 7-5. When operations begin, there will be an EPA SPCC plan available on site for inspection.

The wash bay sump sludge will be removed as necessary and transported off site to an approved hazardous waste disposal facility.

The wash bay at the mine site will include a closed circuit water recycle system. This system will eliminate and store water impurities and reroute water back through the wash bay for cleaning equipment, thus minimizing water consumption the potential for contamination of groundwater resources. Details for this structure can be viewed on Drawings 5-3, and 5-8.

As mining operations approach springs and seeps in the northwest ¼ of Section 29, T39S, R5W (See Drawing 7-4; groundwater discharge area A), there is the potential for drainage of up-gradient into mine openings to cause short-lived diminution of discharge from these springs. If groundwater inflow rates into mine openings in this area are excessive, such that appreciable impacts to the springs and seeps in groundwater discharge area A are likely, where necessary Alton Coal Development, LLC will use a suitable technique to minimize groundwater inflow rates into the mine voids. These techniques may include the use of bentonite or natural clay filled cutoff walls or other means where appropriate to isolate and protect groundwater resources up-gradient of mining activities, minimizing the potential for diminution of discharge rates from these springs. Details of the contingency plan for this occurrence are provided in Appendix 7-9.

~~To prevent the migration of alluvial groundwater from the coarse-grained alluvial groundwater system centered east of the mine permit area into mine pit backfill areas after the completion of mining, a permanent low-permeability barrier will be constructed along the eastern edge of the pit 15 area. Details of this plan are provided in Appendix 7-10.~~

The mine will replace loss of water identified for protection in this MRP that are impacted by mining and reclamation operations.

To protect the hydrologic balance, coal mining and reclamation operations will be conducted to handle earth materials and runoff in a manner that minimizes acidic or toxic drainage, prevents to the extent possible, additional contributions of suspended solids to streamflow outside the permit area and otherwise prevents water pollution. Runoff and sediment control measures are described in detail in Chapter 5 of this MRP. The mine will maintain adequate runoff- and sediment-control facilities to protect local surface waters.

Discharge of mine water that has been disturbed by coal mining and reclamation operations is not anticipated. However, any discharges of water from areas disturbed by coal mining and reclamation operations that do occur will be made in compliance with all Utah and federal water quality laws and regulations and with effluent limitations for coal mining promulgated by the U.S. Environmental Protection Agency set forth in 40 CFR part 434. Discharge of mine waters will be regulated by a Utah UPDES discharge permit.

Water pollution associated with mining and reclamation activities within the permit areas will be controlled by:

- Construction of berms and/or diversion ditches to control runoff from all facilities areas.
- Roads will be constructed with ditches to capture runoff
- Diversion ditches will be constructed as necessary around active mining and reclamation areas to capture runoff from those areas.
- Sedimentation impoundments will be constructed to control discharges
- In areas where impoundments or diversions are not suitable to the surrounding terrain, silt fence or straw bales will be utilized to control sediment discharge from the permit area.

In order to accomplish these objectives, watershed analysis of the permit and adjacent areas has been completed and specific designs are established for each water pollution control structure. Primary control structures include ~~four~~ five sediment impoundments, four diversion ditches and miscellaneous berms. The locations of these structures can be viewed on Drawing 5-3. The detailed analysis for these structures and specific designs can be viewed on Drawings 5-25 through 5-34. In addition, a geotechnical analysis of the impoundments to ensure stability can be viewed in Appendix 5-1. The watershed and structure sizing analysis can be viewed in Appendix 5-2. In addition to these primary structures, temporary diversions and impoundments may also be implemented, as necessary, in mining areas to further enhance pollution controls.

Sediment control measures will be located, maintained, constructed and reclaimed according to plans and designs given under R645-301-732, R645-301-742 and R645-301-760. Siltation structures and diversions will be located, maintained, constructed and reclaimed according to plans and designs given under R645-301-732, R645-301-742 and R645-301-763. Storm water and snow melt that occurs within the facilities area will be routed to an impoundment that will contain sediment. This impoundment will have a drop-pipe spillway installed that will allow removal of any oil sheens that may result from parking lots or maintenance activities by using absorbent materials to remove the sheen. Details for this impoundment can be viewed on Drawings 5-28.

There are ~~four~~five sediment impoundments proposed for the permit area. These structures will be constructed using a combination of dozers and backhoes. The structures have been designed to contain the required storm events as specified in Appendix 5-2. The structures will have sediment removed as necessary to ensure the required capacities. Details for these structures can be viewed on Drawings 5-25, 5-26 and 5-28 through 5-32. Calculations and supporting text can be viewed in Appendix 5-2.

Four diversion ditches along with ~~four~~ five sediment impoundments are proposed for the permit area. In addition, miscellaneous controls such as silt fence and berms are also proposed for specific areas. The proposed locations for these structures are shown on Drawing 5-3. Details associated with these structures can be viewed on Drawings 5-25 through 5-34 and Appendix 5-2.

The smallest practicable area, consistent with reasonable and safe mine operational practices will be disturbed at any one time during the mining operation and reclamation phases. This will be accomplished through progressive backfilling, grading, and prompt revegetation of disturbed areas.

There are no other coal processing waste banks, dams or embankments proposed within the permit area.

Diesel fuels, oils, greases, and other hydrocarbons products will be stored and used at the mine site for a variety of purposes. A spill Prevention Control and Countermeasure Plan will be implemented that will help minimize any potential detrimental impacts to the environments.

Products including potentially hazardous chemicals, fuels, and oils used in the mining process will be stored and used in a manner that minimizes the potential for these products to contaminate surface-water resources. Concrete oil and fuel containments will be constructed as shown on Drawings 5-3 and 5-8.

The wash bay at the mine site will include a closed circuit water recycle system. This system will eliminate and store water impurities and reroute water back through the wash bay for cleaning equipment, thus minimizing water consumption the potential for contamination of surface-water resources. Details for this structure can be viewed on Drawings 5-3, 5-8, and Appendix 5-4. .

Roads will be located, designed, constructed, reconstructed, used, maintained and reclaimed according to R645-301-732.400, R645-301-742.400 and R645-301-762. The specific plan for road locations and design are presented in R645-301-534. The location and details for roads can be viewed on Drawings 5-3 and 5-22 through 5-24.

Roads will be located, designed, constructed, reconstructed, used, maintained and reclaimed to control or prevent additional contributions of suspended solids to stream flow or runoff outside the permit area; Neither cause nor contribute to, directly or indirectly, the violation of effluent standards given under R645-301-751; minimize the diminution to or degradation of the quality or quantity of surface- and ground-water systems; and refrain from significantly altering the normal flow of water in streambeds or drainage channels. No acid- or toxic-forming substances will be used in road surfacing.

All roads will be removed and reclaimed according to Drawings 5-35 and 5-36. The estimated timetable for removing these roads is shown on Drawing 5-38. Cut ditches will be established on the shoulders of all primary roads to control drainage and erosion. Cut and fill slopes along the primary roads will be minimal and are not expected to cause significant erosion. In locations where there are culvert crossings (i.e. Lower Robinson Creek), the fills slopes will be stabilized by utilizing standard methods such as grass matting or straw wattles.

All wells will be managed to comply with R645-301-748 and R645-301-765. Water monitoring wells will be managed on a temporary basis according to R645-301-738.

Wells constructed for monitoring groundwater conditions in the proposed Coal Hollow Mine permit and adjacent area, including exploration holes and boreholes used for water wells or monitoring wells, will be designed to prevent contamination of groundwater and surface-water resources and to protect the hydrologic balance. A diagram depicting typical monitoring well construction methods is shown in Drawing 7-11. Monitoring wells will include a protective hydraulic seal immediately above the screened interval, an annular seal plugging the borehole above the hydraulic seal to near the ground surface, and a concrete surface seal extending from the top of the hydraulic seal to the ground surface which is sloped away from the well casing to prevent the entrance of surface flows into the borehole area. Well casings will protrude above the ground surface a sufficient height so as to minimize the potential for the entrance of surface water or other material into the well. A steel surface protector with a locking cover will be installed at monitoring wells to prevent access by unauthorized personnel. Where there is potential for damage to monitoring wells, the wells will be protected through the use of barricades, fences, or other protective devices. These protective devices will be periodically inspected and maintained in good operating conditions. Monitoring wells will be locked in a closed position between uses.

When no longer needed for monitoring or other use approved by the Division upon a finding of no adverse environmental or health and safety effects, or unless approved for transfer as a water well under R645-301-731.100 through R645-301-731.522 and R645-301-731.800, each well will be capped, sealed, backfilled, or otherwise properly managed, as required by the Division in accordance with R645-301-529.400, R645-301-631.100, and R645-301-748. Permanent closure measures will be designed to prevent access to the mine workings by people, livestock, fish and wildlife, machinery and to keep acid or other toxic drainage from entering ground or surface waters.

If a water well is exposed by coal mining and reclamation operations, it will be permanently closed unless otherwise managed in a manner approved by the Division.

Permanent closure and abandonment of water wells greater than 30 feet in depth will be in accordance with the requirements of "Administrative Rules for Water Well Drillers", State of Utah, Division of Water Rights or other applicable state regulations. Abandonment of wells will be performed by a licensed water well driller. The wells to be abandoned will be completely filled using neat cement grout, sand cement grout, unhydrated bentonite, or bentonite grout, or other materials approved by the Utah State Engineer's office. Alternatively, the well may be abandoned using a different procedure upon approval from the Utah State Engineer's office.

Abandonment materials will be introduced at the bottom of the well or required sealing interval and placed progressively upward to the top of the well. The casing will be severed a minimum of 2 feet below the ground surface. A minimum of 2 feet of compacted native material will be placed above the abandoned well upon completion.

Within 30 days of the completion of well abandonment procedures, a report will be submitted to the State Engineer by the responsible licensed driller giving data related to the abandonment of the well. This shall include the name of the licensed driller or other person(s) performing abandonment procedures, name of well owner at the time of abandonment, the address or location of the well by section, township, and range, abandonment materials and equipment used, water right or file number covering the well, the final disposition of the well, and the date of completion.

Water wells less than thirty feet deep are not regulated by the Utah Division of Water Rights. The permanent closure and abandonment of water wells less than 30 feet deep will be accomplished by filling the well casing with neat cement grout, sand cement grout, unhydrated bentonite, or bentonite grout, or other appropriate materials. The well casing will then be cut off below the ground surface and native materials placed over the abandoned well site.

Exploration holes and boreholes will be backfilled, plugged, cased, capped, sealed, or otherwise managed to prevent acid or toxic contamination of water resources and to minimize disturbance to the prevailing hydrologic balance. Exploration holes and boreholes will be managed to ensure the safety of people, livestock, fish and wildlife, and machinery.

If a water well is exposed by coal mining and reclamation operations, it will be permanently closed unless otherwise managed in a manner approved by the Division.

If any exploration boreholes are to be used as monitoring wells or water wells, these will meet the provisions of R645-301-731 and be managed according to the following.

Boreholes will be backfilled to within 1 foot of the land surface with concrete or other materials approved by the Division as necessary to prevent contamination of groundwater or surface-water resources or to protect the prevailing hydrologic balance. The upper approximately 1 foot will be backfilled with native materials to facilitate reclamation (see Drawing 6-11). Exploration holes and boreholes that may be uncovered during mining and reclamation activities will be permanently closed unless approved for water monitoring or otherwise managed in a manner approved by the Division.

If mining and reclamation activities result in the contamination, diminution, or interruption of State appropriated groundwater or surface-water sources, replacement water will be provided using the alternate water source described in R645-301-727.

Seasonal baseline water monitoring information for all water rights that could be affected by mining in the permit and adjacent area have been submitted electronically to the Division's on-line hydrology database.

731.200 <u>Water Monitoring</u>

This section describes the hydrologic monitoring plan (including that for the 85.88-acre Dame Lease IBC). Locations of surface-water and groundwater monitoring sites are indicated on Drawing 7-10. Hydrologic monitoring protocols, sampling frequencies, and sampling sites are described in Table 7-4. Groundwater and surface-water monitoring locations are listed in Table 7-5. Operational field and laboratory hydrologic monitoring parameters for surface water are listed in Table 7-6, and for groundwater in Table 7-7. The hydrologic monitoring plan during reclamation will be the same as during the operational phase. The hydrologic monitoring parameters have been selected in consultation with the Division's directive Tech-006, *Water Monitoring Programs for Coal Mines.*

The groundwater and surface-water monitoring plan is extensive and includes 53 monitoring sites. The monitoring plan is designed to monitor groundwater and surface-water resources for any potential impacts that could potentially occur as a result of mining and reclamation activities in the proposed Coal Hollow Mine permit and adjacent area. Each of the sampling locations and their monitoring purpose are described below.

<u>Streams</u>

Kanab Creek will be monitored at sites SW-3 (above the permit area), and SW-2 (below the permit area). Lower Robinson Creek will be monitored at sites SW-4 (above the permit area), SW-101 (within the permit area), and SW-5 (below the permit area above the confluence with Kanab Creek). The irrigation water near SW-4 will also be monitored at site RID-1. Swapp Hollow creek will be monitored above the permit area at site SW-8. Sink Valley Wash will be monitored at SW-6 (a small tributary to the wash immediately below the permit area) and at SW-9, located in the main drainage below the permit area. All of these locations, with the exception of RID-1) will be monitored for discharge and water quality parameters specified in Table 7-6 quarterly, when reasonably accessible. Additionally, Lower Robinson Creek will be monitored at site BLM-1, which is near the location of alluvial groundwater emergence in the bottom of the stream channel. RID-1 will be monitored for discharge and field water quality parameters. BLM-1 will be monitored for discharge and water quality parameters specified in Table 7-6 quarterly. Monitoring sites BLM-1, SW-5, SW-6, and SW-9 will also be monitored for total and dissolved selenium quarterly.

Springs

Eight springs from alluvial groundwater area A will be monitored including SP-8, SP-14, SP-16, SP-19, SP-20, SP-22, SP-24 and Sorensen Spring. Spring SP-8 is a developed spring in area A that provides culinary water for the Swapp Ranch house. SP-8 will be monitored for discharge and operational laboratory water quality measurements quarterly when reasonably accessible. Springs SP-14, SP-16, SP-19, SP-20, SP-22, SP-24 and Sorensen Spring springs will be monitored for discharge and field water quality measurements quarterly when reasonably accessible.

Springs SP-4 and SP-6, and SP-33, which are located in Sink Valley below the proposed mining area, will also be monitored. SP-6 is an area of diffuse seepage above an earthen impoundment in the wash immediately below the permit area. Spring SP-33 is a developed spring that discharges into a pond below the permit area and provides culinary water to two adjacent cabins. Each of these Springs SP-6 and SP-33 will be monitored for discharge and operational laboratory water quality measurements quarterly when reasonably accessible. SP-4 discharges from a fault/fracture system in the Dakota Formation near the canyon margin in Sink Valley Wash below the permit area. Spring SP-4 will be monitored for discharge and field water quality measurements quarterly when reasonably accessible. Spring SP-3 discharges from pediment alluvium in the upland area above Sink Valley Wash more than a mile from the permit area. It is extremely unlikely that discharge rates or water quality at this spring could be impacted as a result of mining-related activities in the mine permit area. However, this spring will be monitored for discharge and field water quality measurements quarterly, primarily to provide background data from springs in the region.

Wells

Wells Y-98 (Robinson Creek alluvium above the permit area), Y-45 (coal seam well in Swapp Hollow above permit area), Y-102 (flowing alluvial well in alluvial groundwater discharge area A), Y-36 (coal seam well in Sink Valley above the permit area), Y-38 (coal seam well in Sink Valley permit area), Y-61 (alluvial well at the Sorenson Ranch), and C5-130 (new monitoring well in alluvial groundwater discharge A) will be monitored quarterly when reasonable accessible. Well Y-61 will be monitored for groundwater operational laboratory water quality parameters to monitor groundwater quality in alluvial groundwater discharge area A. The other wells will be monitored for water level only.

Additionally, 19 newly constructed monitoring wells constructed in the Sink Valley alluvial groundwater system will be monitored quarterly. These include C2-15, C2-28, C2-40, C3-15, C3-30, C3-40, C4-15, C4-30, C4-50, C7-20, C9-15, C9-25, C9-40, LS-28, LS-60, LS-85, SS-15, SS-30, and SS-75. All of these wells will be monitored quarterly for water level. Additionally, wells LS-85 and SS-30 will be monitored for groundwater operational laboratory water quality measurements.

Additionally two wells in the Lower Robinson Creek alluvium will be monitored for water level and groundwater operational laboratory chemistry. These include UR-70 located above proposed mining locations in the Lower Robinson Creek drainage, and LR-45, located below proposed mining areas adjacent to Lower Robinson Creek. It should be noted that LR-45 is located near a proposed sediment pond impoundment. Consequently, if this well becomes unsuitable for monitoring, an alternate location will be used to monitor the Lower Robinson alluvial groundwater system in this area.

Wells C0-18 and C0-54 are located near the initial proposed mining areas in the Lower Robinson Creek drainage. These will be monitored for water level quarterly.

It should be noted that many of the wells specified for monitoring in this monitoring plan will at some point be destroyed or rendered inoperable as the mine workings precede through the area. These wells will be monitored until such a time as they are destroyed or become inoperable.

The possible need for an additional monitoring well located along the east-west permit boundary in Section 30, T39S, R4W has been evaluated. As described in Section 728.332, based on the laboratory analyses of acid and toxic forming materials in the overburden, coal seam, and underburden, it has been determined that discharges from the mine areas will likely be alkaline in character and acid mine drainage will likely not occur. Similarly, the potential for toxic drainage is not anticipated (see Section 728.332). Additionally, given the general east to northeasterly direction of the bedrock dip in the mine area, groundwater migrating through the pit backfill areas after mining will likely migrate down slope in those same directions (to the east). Because the lower portions of the highwalls surrounding the mine pit areas consist of relatively impermeable Tropic Shale bedrock, the potential for migration of appreciable quantities of groundwater from the mine pit fill areas into surrounding unmined areas is low (see Section 728.320). Shallow alluvial groundwater that could potentially migrate to the west is monitored for laboratory water quality parameters at well LR-45. Surface runoff from these areas is monitored for laboratory water quality parameters at site SW-5, which is located in Lower Robinson Creek below the proposed mining areas. For these reasons, the installation and monitoring of an additional monitoring well is not deemed necessary at this time.

Groundwater and surface-water monitoring will continue through the post-mining periods until bond release. The monitoring requirements, including monitoring sites, analytical parameters and the sampling frequency may be modified in the future in consultation with the Division if the data demonstrate that such a modification is warranted.

85.88-acre Dame Lease IBC

In conjunction with highwall mining activities within the 85.88-acre Dame Lease IBC, supplemental water monitoring activities will be performed at selected nearby springs and wells. This will include weekly monitoring of spring discharge rates at sites SP-8, SP-14, SP-20, SP-22, and SP-40, and weekly measurements of water levels in monitoring wells C4, C2, C3, C5, and Y-61. The weekly monitoring at these sites will begin one month prior to the commencement of highwall mining in the 85.88-acre Dame Lease IBC and will continue until one month after highwall mining in the IBC is concluded. Following the period of weekly monitoring, the above specified stations will be monitored monthly for a period of six months. The flow and water level data generated during this period of accelerated monitoring will be sent to the Division of Oil, Gas and Mining as a spreadsheet via e-mail at the end of each month.

In accordance with R645-302.245.230 all holes discharging water will be sealed within 72 hours after completion with impervious and noncombustible material. However, in the approved Ground Control Plan for CHM, MSHA requires the adjacent hole remain open for monitoring of the web. Thus, if an adjacent hole is discharging water and needs to be kept open for web monitoring then the discharge will be tested to determine if it contains acid or toxic-forming material and approvel to keep this hole open for web monitoring will be requested from the Division in accordance with R645-302.245.230.

In order to verify that the highwall mining holes excavated into the 85.88-acre Dame Lease IBC do not cause depletion of the overlying shallow alluvial groundwater systems, the groundwater discharge rate (if any) that occurs from the mouths of the holes within the Dame Lease IBC will be monitored daily. The daily monitoring will commence upon completion of the hole excavation and continue until the hole is sealed. Where it is reasonably possible to do so, the discharge rate measurements will be performed using an appropriate field flow measurement technique (i.e. pipe and a calibrated container, flume, weir, etc.). In areas where the performance of a field discharge measurement is not reasonably possible (i.e. under diffuse seepage conditions or where unconcentrated dispersed flow conditions exist) the discharge rate will be estimated. Discharge rate measurements from the highwall holes will not be performed in areas where such measurements cannot be performed safely. In those areas where the discharge rates cannot safely be measured, this will be noted in the flow record and, where possible, a visual estimate of the discharge rate will be made. Upon approval from the Division, at times when no discharge is occurring from any of the open highwall mining holes in the Dame Lease IBC, discharge measurements will be performed daily on those days that the mine is operating (generally Monday through Friday). Under conditions where measurable flows are present at any open highwall mining hole in the 85.88-acre Dame Lease IBC, the flow measurements will be performed on a continuous daily basis (7 days a week) until the hole is sealed. The flow data for each hole will be sent to the Division as a spreadsheet via e-mail at the end of each month.

731.530 State-appropriated water supply

A water supply well was constructed in the Sink Valley Alluvial groundwater system in October of 2010. The ~~proposed~~ water ~~replacement~~ well is being ~~will be~~ used ~~both~~ as a water supply source for the mine and can also be used for water replacement if needed (also for use if needed as a replacement water source for mining in the 85.88-acre Dame Lease IBC). ~~Alton Coal Development, LLC commits to having the water-replacement well (or other appropriate water replacement source as approved by the Division) drilled and developed before beginning overburden removal for Pits 13, 14, and 15.~~

731.600 Stream Buffer Zones

Any perennial or intermittent streams in the mine area will be protected by 100 foot stream buffer zones on either side of these streams. Coal mining and reclamation operations will not cause or contribute to the violation of applicable Utah or federal water standards and will not adversely affect the water quality and quantity or other environmental resources of the stream.

Temporary or permanent stream channel diversion will comply with R645-301-742-300. It should be noted that the proposed Coal Hollow Mine plan calls for the temporary diversion of a reach of the Lower Robinson Creek stream channel approximately 2,000 feet in length in the southeast ¼ of Section 19, T39S, R5W. Details of the proposed diversion are given in Chapter 5, Section 527.220 of this MRP. If this action results in diminution of the meager discharge of surface water in the drainage below the planned diversion, where required a suitable mitigation for this potential impact will be designed and implemented in consultation with the Division of Oil, Gas and Mining.

The areas surrounding the streams that are not to be disturbed will be designated as buffer zones, and will be marked as specified in R645-301-521.260.

731.700 Cross sections and Maps

The locations of springs and seeps identified in the proposed Coal Hollow Mine permit and adjacent area are shown in Drawing 7-1. The locations of baseline hydrologic monitoring locations are shown on Drawing 7-2. The locations of water rights in the proposed Coal Hollow permit and adjacent area are provided on Drawing 7-3. Cross-sections depicting the stratigraphy and hydrostratigraphy of the proposed Coal Hollow Mine permit and adjacent area are presented in Chapter 6, Drawing 6-2. Designs for proposed impoundments in the proposed Coal Hollow permit area are shown in Drawings 5-25 through 5-31

731.800 Water Rights and Replacement

Alton Coal Development, LLC commits to replace the water supply of an owner of interest in real property who obtains all or part of his or her supply of water for domestic, agricultural, industrial, or other legitimate use from the underground or surface source, where the water supply has been adversely impacted by contamination, diminution, or interruption proximately resulting from the surface mining activities. Baseline hydrologic information required in R645-301-624.100 through R645-301-624.200, R645-301-625, R645-301-626, R645-301-723 through R645-301-724.300, R645-301-724.500, R645-301-725 through R645-301-731, and R645-301-731.210

through R645-301-731.223 will be used to determine the extent of the impact of mining upon ground water and surface water.

Sorensen Spring (SP-40) is the current domestic water supply for the Sorensen Ranch (Personal communication, Darlynn Sorensen, 2008). There is currently no development at the spring that would convey water to the ranch house. Rather, water from the spring is obtained directly from the spring for use at the ranch. Monitoring of discharge rate and water quality is included in the proposed water monitoring plan for the Coal Hollow Mine. The operational and reclamation phase water monitoring protocols for this spring are listed in Tables 7-5 and 7-7A. Should the water source be interrupted, diminished, or contaminated, replacement water will be provided from the new water well that will be constructed prior to the beginning of overburden removal for pits 13, 14, and 15 (see description in section R645-301-727 above, and Drawing 5-8C) or other suitable water replacement source as approved by the Division.

~~Reclamation designs for the eastern permit boundary where the mining pits meet the undisturbed alluvium are provided in Appendix 7-10. These designs specify engineering methods to be used to minimize drainage from the alluvium into the fill in the reclaimed pits (as the pits are filled and reclaimed) thereby protecting the hydrologic balance in Sink Valley. Through the emplacement of a permanent engineered low-permeability barrier between the alluvial groundwater systems to the east of the mining area and the mine backfill areas, the alluvial groundwater system will be effectively isolated from the mine backfill areas. An evaluation of the permanent barrier for pit 15 has been performed by Mr. Alan O. Taylor of Taylor Geo-Engineering, LLC. Information in the Taylor Geo-Engineering report indicates that the 50-foot wide barrier will prevent any appreciable drainage of alluvial groundwater from the coarse-grained alluvial groundwater system centered east of the permit area into the backfilled pit areas. Laboratory analysis of the Tropic Shale material from which the barrier will be constructed indicates that the compacted shale material will perform adequately to successfully contain the alluvial groundwater. Thereby water levels in the alluvial groundwater systems in Sink Valley east of the pit areas will be reclaimed to approximate pre-mining levels.~~

As specified in R645-301-112, groundwater quantity will be protected by handling earth materials and runoff in a manner that will restore approximate premining recharge capacity of the reclaimed area as a whole, excluding coal mine waste disposal areas and fills, so as to allow the movement of water to the groundwater system.

732 Sediment Control Measures

Sediment control measures have been designed, constructed and maintained to prevent additional contributions of sediment to streamflow or to runoff outside the permit area.

732.100 Siltation Structures

Siltation structures within the permit area are described in Section 732.200

732.200 Sedimentation Ponds

Four diversion ditches along with ~~four~~five sediment impoundments are proposed for the permit area. In addition, miscellaneous controls such as silt fence and berms are also proposed for specific areas. The proposed locations for these structures are shown on Drawing 5-3. Details associated with these structures can be viewed on Drawings 5-25 through 5-34 and Appendix 5-2.

Sedimentation ponds have been designed in compliance with the requirements of R645-301-356.300, R645-301-356.400, R645-301-513.200, R645-301-742.200 through R645-301-742.240, and R645-301-763.

No sedimentation ponds or earthen structures that will remain open are planned.

The sedimentation plan has been designed to comply with the MSHA requirements given under R645-301-513.100 and R645-301-513.200.

732.300 Diversions

The runoff control plan is designed to isolate, to the maximum degree possible, runoff from disturbed areas from that of undisturbed areas. Where possible, this has been accomplished by allowing up-stream runoff to bypass the disturbed area, and routing any runoff from undisturbed areas that enter the disturbed area into a sediment control system.

Four diversion ditches along with ~~four~~five sediment impoundments are proposed for the permit area. In addition, miscellaneous controls such as silt fence, berms and temporary diversion ditches are also proposed for specific areas. The proposed locations for these structures are shown on Drawing 5-3. Details associated with these structures can be viewed on Drawings 5-25 through 5-34 and Appendix 5-2. All temporary ditches will meet the design requirements of Diversion Ditch 4 (designed for the 100-year, 24 hour storm) and will be adjusted within the permitted active mining area in relation to the active pit, currant spoils pile configuration and reclamation.

732.400 Road Drainage

All roads will be constructed, maintained and reconstructed to comply with R645-301-742.400. Road drainage facilities include diversion ditches, culverts, containment berms, and/or water bars. Specific plans for road drainage, road construction, and road maintenance are presented in Chapter 5, Section 534 of this MRP.

A description of measures to be taken to obtain division approval for alteration or relocation of a natural drainage way will be presented to the Division when necessary.

A description of measures to be taken to protect the inlet end of a ditch relief culvert will be submitted to the Division when necessary.

All road drainage diversions will be maintained and repaired to operational condition following the occurrence of a large storm event. Culvert inlets and outlets will be kept clear of sediment and other debris.

733 IMPOUNDMENTS

733.100 General Plans

A professional engineer experienced in the design and construction of impoundments with assistance from a geotechnical expert has used current, prudent, engineering practices to design the proposed impoundments.

The plans have been certified and a detailed geotechnical analysis has been provided in Appendix 5-1. The certifications, drawings and cross sections can be viewed in Drawings 5-25 through 5-31 and Appendices 5-1 and 5-2.

As requested by the Division, the design criteria of the mine site sediment ponds have been reevaluated in light of groundwater that is being encountered at the site (see Appendix 7-11). It was the determination of this reevaluation that the sediment ponds currently in place meet or exceed the minimum requirements of the Utah Coal Mining Rules and that the construction of additional ponds or the redesigning of existing ponds is not required at this time. Accordingly, the small ephemeral channel tributary to Lower Robinson Creek near the toe of the spoils pile mentioned in the Division Deficiency List (Task No. 3799) has been evaluated as a potential sediment pond site, but the construction of a sediment pond in that location is not required at the current time.

As indicated in Section 728.332, where appreciable alluvial groundwater inflows into the mine pit areas occur and where deemed necessary and possible, alluvial groundwater inflows into the mine pit areas will be diverted away from the mine pit areas through pipes, ditches, or other conveyance methods, minimizing the need for the pumping of mine discharge waters to the sediment ponds. Groundwater that interacts with the Tropic Shale and the Smirl coal seam in the mine pits is considered as mine water and accordingly it will be either routed to Pond #3 or Pond #4 and subsequently discharged under the approved Coal Hollow Mine UPDES discharge permit, or it will be contained and managed within the pit areas and not discharged.

Depending on prevailing climatic conditions and on the nature and quantity of encountered mine waters, at times it may periodically be necessary to discharge water from the Coal Hollow Mine sediment ponds. The discharges from the ponds will occur in compliance with the approved Coal Hollow Mine UPDES permit (see Appendix 7-12).

Five impoundments are proposed to control storm water runoff and sediment from disturbed areas. Each impoundment is designed to contain the run off from a 100 year, 24 hour duration storm event. The locations of the impoundments and the associated watersheds can be viewed on Drawing 5-26. The following table summarizes the final capacity results for each impoundment:

Sedimentation Impoundment Capacities				
Structure	Storage Required (ac/ft)	Design Storage* (ac/ft)	Percent of requirement	Additional Storage (ac/ft)
1	2.6	3.1	119	0.5
2	1.7	2.3	135	0.6
3	6.3	10.9	173	4.6
4	2.1	5.5	261	3.4
1B	0.5	0.8	160	0.3

Structure 1 is a rectangular impoundment approximately 136 feet long by 81 feet wide and 9 feet in depth. This impoundment will control storm water run off from the facilities area. The impoundment will be constructed with a 24” drop pipe spillway in order to prevent any oil sheens that may occur from discharging. This impoundment will be incised into the existing ground. Part of the excavated material will be utilized to construct an embankment on the down grade side to provide a minimum of 3 feet freeboard. This pond will control storm water from a watershed of approximately 27 acres. The cleanout and spillway elevation are 6911’ and 6920’, respectively. The top of the embankment is at elevation 6924’. Details for the design can be viewed on Drawing 5-28.

Structure 1B is a small rectangular impoundment that is approximately 40 feet long by 20 feet wide. This impoundment will control storm water run off from the facilities access road system. The impoundment will be constructed with a 24” drop pipe spillway in order to prevent any oil sheens that may occur from discharging. This impoundment will be incised into the existing ground. Part of the excavated material will be utilized to construct an embankment on the down grade side to provide a minimum of 2 feet freeboard. This pond will control storm water from a watershed of approximately 5 acres. The cleanout and spillway elevation are 6894' and 6906', respectively. The top of the embankment is at elevation 6908'. Details for the design can be viewed on Drawing 5-28B.

Structure 2 is a rectangular impoundment approximately 188 feet long by 36 feet wide and 9 feet in depth. This impoundment will control storm water runoff from the disturbed areas immediately south of Lower Robinson Creek. The impoundment will be constructed with a 24" drop pipe spillway. Part of the excavated material will be utilized to construct an embankment on the down grade side to provide a minimum 3 feet freeboard. This pond will control storm water runoff from a watershed of approximately 74 acres. The cleanout and spillway elevation are 6891' and 6900', respectively. Top of the embankment is at elevation 6903'. Details for the design can be viewed on Drawing 5-29.

Structure 3 is a valley fill impoundment that will impound an area approximately 484 feet long by 229 feet wide and 9 feet deep. The fill for the impoundment will be constructed from an excavation 198 feet wide by 229 feet long and 8 feet deep. The embankment will be constructed in 2 foot lifts utilizing a dozer. The top of the embankment will be a minimum 12 feet wide. This pond will have a decant pipe install at the 6808' elevation that allows for the pond level to be managed and to still be able to contain the 100 year 24 hour event. Also, ~~The~~ this pond has a secondary open channel spillway ~~will be an open channel~~ that will have rip-rap min. 6". This pond will control storm water runoff from a watershed of approximately 300 acres, it will also be capable of receiving ground water from the underground in the event it cannot be managed at the underground operation (not considered likely). The cleanout and spillway elevation are ~~6802'~~ 6801' and 6811', respectively. Top of the embankment is at 6813'. Details for the design can be viewed on Drawing 5-30.

Structure 4 is a rectangular pond located at the south end of the permit area that is approximately 90 feet wide by 582 feet long and 12 feet deep. This impoundment will be incised into the existing ground. Part of the excavation will be used to construct a 12 foot wide embankment. The spillway will be an open channel that will have rip-rap min. 6". This pond will control storm water runoff from a watershed of approximately 96 acres. The cleanout and spillway elevation are 6822' and 6834', respectively. Top of the embankment is at elevation 6838'. Details for the design can be viewed on Drawing 5-31.

Open channel spillway details for impoundments 3 and 4 are provided in Drawing 5-32. These spillways are designed for emergencies and are not expected to be used during normal operations.

The outer slopes of the impoundments will be sloped to a maximum grade of 3h:1v. Inside slopes will be graded to a maximum 2h:1v. The slopes will be graded and revegetated for erosion control.

No underground mine workings exist near or under the impoundment structures; therefore subsidence surveys are not provided.

Geologic data for the area where impoundments will be located consists of mainly fine grained alluvium with high clay content. Seepage from the impoundments is expected to be minimal based on the high clay content of the existing materials. Characterization of the soils is contained in Chapter 2. Acid and Toxic analysis of the soils indicates that water seeping through the alluvium layer will not result in reducing water quality. The acid and toxic analysis for the alluvium can be viewed in Appendix 6-2.

Hydrologic data for the permit area is provided in Appendix 7-1. This data indicates that there will be some seepage through the subsurface that may travel to adjacent drainages. The quantities for this seepage are expected to be minimal and will have minimal impact to the overall hydrologic balance. Even though seepage may occur, analysis of the soils indicates that water quality will not be diminished.

The above information provides a summary of all the impoundment structures that are proposed for the Coal Hollow Project. Detailed designs and calculations are provided in this section, Drawings 5-26 through 5-32 and Appendix 5-2. No other impoundments are anticipated.

At some times it may be necessary to discharge water from the sediment ponds. The approved Coal Hollow UPDES permit (Appendix 7-12) allows for discharges.

733.200 Permanent and Temporary Impoundments

All impoundments have been designed and constructed using current, prudent engineering practices and have been designed to comply with the requirements of R645-301-512.240, R645-301-514.300, R645-301-515.200, R645-301-533.100 through R645-301-533.600, R645-301-733.220 through R645-301-733.226, R645-301-743.240, and R645-301-743.

No impoundments or sedimentation ponds meeting the size or other qualifying criteria of MSHA, 30 CFR 77.216(a) exist or are planned within the proposed Mine Permit Area. Should impoundments and sedimentation ponds meeting the size or other qualifying criteria of MSHA, 30 CFR 77.216(a) become necessary, compliance with the requirements of MSHA, 30 CFR 77.216 will be met.

All five planned impoundments have been evaluated by a professional engineer to ensure stability of each structure. The stability analysis performed resulted in a static safety factor of at least 2.2 for each structure. The details for this analysis can be viewed in Appendix 5-1.

No permanent impoundments are planned in the project area.

If any examination or inspection discloses that a potential hazard exists, the person who examined the impoundment will promptly inform the Division according R645-301-515.200.

734 Discharge Structures

Discharge structures will be constructed and maintained to comply with R645-301-744.

The proposed impoundments are designed to temporarily store water from storm events and snow melt. Long term standing water in the impoundments is anticipated to be seasonal and sediment will be removed as necessary to provide the required storage capacities. Emergency spillways have been included in the designs to provide a non-destructive discharge route should the capacities ever be exceeded. Surveys of these impoundments will be regularly conducted to ensure that the required design capacities are available.

Impoundments 3 and 4 will be constructed with open channel spillways. These spillways are designed to discharge a 6 hour duration, 100 year storm event even though they are not expected to be used. They will have rip-rap min 6" to minimize erosion and spillway slopes will not exceed 3h:1v. Drawing 5-32 provides the details for the open channel spillways. Also, impoundment 4 will have a decant installed at the 6808 elevation that will allow for the pond level to be managed and to still be able to contain the 100 year 24 hour event.

Impoundments 1, 1B and 2 will be constructed with a drop pipe spillway system. Storm water and snow melt that occurs within the associated watersheds will be routed to these impoundments to contain sediment. These impoundments will have the drop-pipe spillways installed which will allow removal of any oil sheens that may result from parking lots, primary roads or maintenance activities by using absorbent materials to remove the sheen. The drop-pipe spillways are 24" diameter pipes that are vertical in the impoundment. These pipes have a metal cover over the end. This cover is recessed over the pipe by at least an inch, with a gap between the cover and the pipe. This leaves a route for water to discharge once the impoundment is full but prevents debris or pollutants located on the water surface from discharging. This system was chosen for these three impoundments based on their locations in relation to the facilities and primary roads. This discharge system will be constructed for precautionary measures only since pollutants are not expected in the impoundments during normal operations.

Disposal of Excess Spoil

Areas designated for the disposal of excess spoil and excess spoil structures will be constructed and maintained to comply with R645-301-745.

Details of proposed excess spoil disposal plans are presented in Chapter 5, Section 535 of this MRP and are summarized below.

A geotechnical analysis has been completed for the proposed excess spoil structure. This analysis estimates the long-term safety factor to be 1.6 to 1.7 based on the proposed design. Following proper construction practices of building the structure in maximum four foot lifts and meeting 85% compaction based on the standard Procter will ensure that the structure will be stable under all conditions of construction. This construction will occur only in the designated excess spoil area as shown on Drawing 5-3 and 5-35. The fill will be placed with end dump haul trucks and lifts will be constructed using dozers. High precision GPS systems will be regularly utilized to check grades and appropriate lift thickness. The geotechnical analysis for this structure can be viewed in Appendix 5-1.

The excess spoil is planned to be placed in an area where natural grades range from 0 to 5%. This is one of the most moderately sloping locations in the Permit Area. Stability of this structure is estimated to be 1.6 to 1.7 based on the Appendix 5-1.

Geotechnical borings were completed in the foundation of the proposed disposal area. Laboratory analysis of these borings has also been completed. Details of this analysis can be viewed in Appendix 5-1.

Permanent slopes for the proposed excess spoil will not exceed 3h:1v (33 percent), therefore no keyway cuts have been proposed in the design. Appendix 5-1 details the stability analysis for the proposed structure.

Excess spoil will not be disposed of in underground mine workings.

Horizontal lifts will not exceed four feet in thickness unless otherwise approved by the Division. The lifts will be concurrently compacted to meet 85% of the standard Procter. The geotechnical analysis (Appendix 5-1), provides information showing that these construction standards will provide mass stability and will prevent mass movement during and after construction. The excess spoil will be graded to provide drainage similar to original flow patterns. Topsoil and subsoil as designated in Chapter 2 will be removed and separated from other materials prior to placement of spoil.

A description of the character of the bedrock and any adverse geologic conditions in presented in Appendix 5-1.

Spring and seep survey information is provided on Drawing 7-1. There are no springs or seeps identified in the excess spoil area.

There are no historical underground mining operations in the proposed excess spoil area. There are ~~also no~~ future underground operations proposed.

There are no rock chimneys or drainage blankets proposed.

A stability analysis including strength parameters, pore pressures and long-term seepage conditions is presented together with all supporting data in Appendix 5-1.

Neither rock-toe buttresses nor key-way cuts are required under R645-301-535.112 or R645-301-535.113.

No valley fills or head-of-hollow fills are proposed.

No durable rock fills are proposed.

No disposal of waste on preexisting benches is planned

The excess spoil structure and fill above approximate original contour are the only alternative specifications proposed. A geotechnical analysis has been completed for this proposal and can be viewed in Appendix 5-1. All other mined areas will be restored to approximate original contour.

735 Coal Mine Waste

Areas designated for disposal of coal mine waste and coal mine waste structures will be constructed and maintained to comply with R645-301-746.

No structures for the disposal of coal mine waste are planned.

736 Noncoal Mine Waste

Noncoal mine waste will be stored and final disposal of noncoal mine waste will comply with R645-301-747

Noncoal mine waste, including but not limited to grease, lubricants, paints, flammable liquids, garbage, machinery, lumber and other combustible materials generated during coal mining and reclamation operations will be temporarily stored in a controlled manner. Final disposal of noncoal mine wastes will consist of removal from the project area and transportation to a State-approved solid waste disposal area.

Only sizing of the coal is proposed. This process will not produce any waste.

At no time will any noncoal mine waste be deposited in a refuse pile or impounding structure, nor will any excavation for a noncoal mine waste disposal site be located within eight feet of any coal outcrop or coal storage area.

Notwithstanding any other provision to the R645 Rules, any noncoal mine waste defined as "hazardous" under 3001 of the Resource Conservation and Recovery Act (RCRA) (Pub. L. 94-580, as amended) and 40 CFR Part 261 will be handled in accordance with the requirements of Subtitle C of RCRA and any implementing regulations.

Debris, acid-forming, toxic-forming materials and materials constituting a fire hazard will be identified and disposed of in accordance with R645-301-528.330, R645-301-537.200, R645-301-542.740, R645-301-553.100 through R645-301-553.600, R645-301-553.900, and R645-301-747. Appropriate measures will be implemented to preclude sustained combustion of such materials.

Plans do not include using dams, embankments or other impoundments for disposal of coal, overburden, excess spoil or coal mine waste.

738 Temporary Casing and Sealing of Wells

Wells constructed for monitoring groundwater conditions in the proposed Coal Hollow Mine permit and adjacent area, including exploration holes and boreholes used for water wells or monitoring wells, will be designed to prevent contamination of groundwater and surface-water resources and to protect the hydrologic balance. A diagram depicting typical monitoring well construction methods is shown in Drawing 7-11. Monitoring wells will include a protective hydraulic seal immediately above the screened interval, an annular seal plugging the borehole above the hydraulic seal to near the ground surface, and a concrete surface seal extending from the top of the hydraulic seal to the ground surface which is sloped away from the well casing to prevent the entrance of surface flows into the borehole area. Well casings will protrude above the ground surface a sufficient height so as to minimize the potential for the entrance of surface water or other material into the well. A steel surface protector with a locking cover will be installed at monitoring wells to prevent access by unauthorized personnel. Where there is potential for damage to monitoring wells, the wells will be protected through the use of barricades, fences, or other protective devices. These protective devices will be periodically inspected and maintained in good operating conditions. Monitoring wells will be locked in a closed position between uses.

When no longer needed for monitoring or other use approved by the Division upon a finding of no adverse environmental or health and safety effects, or unless approved for transfer as a water well under R645-301-731.100 through R645-301-731.522 and R645-301-731.800, each well will be capped, sealed, backfilled, or otherwise properly managed, as required by the Division in accordance with R645-301-529.400, R645-301-631.100, and R645-301-748. Permanent closure measures will be designed to prevent access to the mine workings by people, livestock, fish and wildlife, machinery and to keep acid or other toxic drainage from entering ground or surface waters.

If a water well is exposed by coal mining and reclamation operations, it will be permanently closed unless otherwise managed in a manner approved by the Division.

Permanent closure and abandonment of water wells greater than 30 feet in depth will be in accordance with the requirements of "Administrative Rules for Water Well Drillers", State of Utah, Division of Water Rights or other applicable state regulations. Abandonment of wells will be performed by a licensed water well driller. The wells to be abandoned will be completely filled using neat cement grout, sand cement grout, unhydrated bentonite, or bentonite grout, or other materials approved by the Utah State Engineer's office. Alternatively, the well may be abandoned using a different procedure upon approval from the Utah State Engineer's office.

Abandonment materials will be introduced at the bottom of the well or required sealing interval and placed progressively upward to the top of the well. The casing will be severed a minimum of 2 feet below the ground surface. A minimum of 2 feet of compacted native material will be placed above the abandoned well upon completion.

Within 30 days of the completion of well abandonment procedures, a report will be submitted to the State Engineer by the responsible licensed driller giving data related to the abandonment of the well. This shall include the name of the licensed driller or other person(s) performing abandonment procedures, name of well owner at the time of abandonment, the address or location of the well by section, township, and range, abandonment materials and equipment used, water right or file number covering the well, the final disposition of the well, and the date of completion.

Exploration holes and boreholes will be backfilled, plugged, cased, capped, sealed, or otherwise managed to prevent acid or toxic contamination of water resources and to minimize disturbance to the prevailing hydrologic balance. Exploration holes and boreholes will be managed to ensure the safety of people, livestock, fish and wildlife, and machinery.

If any exploration boreholes are to be used as monitoring wells or water wells, these will meet the provisions of R645-301-731

Boreholes will be backfilled to within 1 foot of the land surface with concrete or other materials approved by the Division as necessary to prevent contamination of groundwater or surface-water resources or to protect the prevailing hydrologic balance. The upper approximately 1 foot will be backfilled with native materials to facilitate reclamation (see Drawing 6-11). Exploration holes and boreholes that may be uncovered during mining and reclamation activities will be permanently closed unless approved for water monitoring or otherwise managed in a manner approved by the Division.

740 **DESIGN CRITERIA AND PLANS**

741 **GENERAL REQUIREMENTS**

742 **SEDIMENT CONTROL MEASURES**

742.100 General Requirements

742.110 Design

Appropriate sediment control measures will be designed, constructed and maintained using best technology currently available to prevent to the extent possible, contributions of sediment to stream flow or to runoff outside the permit area; meet the effluent limitations under R645-301-751; and minimize erosion to the extent possible.

Four diversion ditches along with five sediment impoundments are proposed for the permit area. In addition, miscellaneous controls such as silt fence and berms are also proposed for specific areas. The proposed locations for these structures are shown on Drawing 5-3. Details associated with these structures can be viewed on Drawings 5-25 through 5-34 and Appendix 5-2. These impoundments in combination with the ditches will be the primary method that will be used to control sediment resulting from disturbed areas. In addition to the drawings and Appendix 5-2 , the following is a description of the structures:

A professional engineer experienced in the design and construction of impoundments with assistance from a geotechnical expert has used current, prudent, engineering practices to design the proposed impoundments.

The plans have been certified and a detailed geotechnical analysis has been provided in Appendix 5-1. The certifications, drawings and cross sections can be viewed in Drawings 5-25 through 5-31 and Appendices 5-1 and 5-2.

Five impoundments are proposed to control storm water runoff and sediment from disturbed areas. Each impoundment is designed to contain the run off from a 100 year, 24 hour duration storm event. The locations of the impoundments and the associated watersheds can be viewed on Drawing 5-26. The following table summarizes the final capacity results for each impoundment:

Sedimentation Impoundment Capacities				
Structure	Storage Required (ac/ft)	Design Storage* (ac/ft)	Percent of requirement	Additional Storage (ac/ft)
1	2.6	3.1	119	0.5
2	1.7	2.3	135	0.6
3	6.3	10.9	173	4.6
4	2.1	5.5	261	3.4
1B	0.5	0.8	160	0.3

Structure 1 is a rectangular impoundment approximately 136 feet long by 81 feet wide and 9 feet in depth. This impoundment will control storm water run off from the facilities area. The impoundment will be constructed with a 24" drop pipe spillway in order to prevent any oil sheens that may occur from discharging. This impoundment will be incised into the existing ground. Part of the excavated material will be utilized to construct an embankment on the down grade side to provide a minimum of 4 feet freeboard. This pond will control storm water from a watershed of approximately 27 acres. The cleanout and spillway elevation are 6911' and 6920', respectively. The top of the embankment is at elevation 6924'. Details for the design can be viewed on Drawing 5-28.

Structure 1B is a small rectangular impoundment that is approximately 40 feet long by 20 feet wide. This impoundment will control storm water run off from the facilities access road system. The impoundment will be constructed with a 24" drop pipe spillway in order to prevent any oil sheens that may occur from discharging. This impoundment will be incised into the existing ground. Part of the excavated material will be utilized to construct an embankment on the down grade side to provide a minimum of 2 feet freeboard. This pond will control storm water from a watershed of approximately 5 acres. The cleanout and spillway elevation are 6894' and 6906', respectively. The top of the embankment is at elevation 6908'. Details for the design can be viewed on Drawing 5-28B.

Structure 2 is a rectangular impoundment approximately 188 feet long by 36 feet wide and 9 feet in depth. This impoundment will control storm water runoff from the disturbed areas immediately south of Lower Robinson Creek. The impoundment will be constructed with a 24" drop pipe spillway. Part of the excavated material will be utilized to construct an embankment on the down grade side to provide a minimum 3 feet freeboard. This pond will control storm water runoff from a watershed of approximately 74 acres. The cleanout and spillway elevation are 6891' and 6900', respectively. Top of the embankment is at elevation 6903'. Details for the design can be viewed on Drawing 5-29.

Structure 3 is a valley fill impoundment that will impound an area approximately 484 feet long by 229 feet wide and 9 feet deep. The fill for the impoundment will be constructed from an excavation 198 feet wide by 229 feet long and 8 feet deep. The embankment will be constructed in 2 foot lifts utilizing a dozer. The top of the embankment will be a minimum 12 feet wide. This pond will have a decant pipe install at the 6808' elevation that allows for the pond level to be managed and to still be able to contain the 100 year 24 hour event. Also, ~~The~~ this pond has a secondary open channel spillway ~~will be an open channel~~ that will have rip-rap min. 6. This pond will control storm water runoff from a watershed of approximately 300 acres, it will also be capable of receiving ground water from the underground in the event it cannot be managed at the underground operation (not considered likely). The cleanout and spillway elevation are ~~6802'~~ 6801' and 6810', respectively. Top of the embankment is at 6814'. Details for the design can be viewed on Drawing 5-30.

Structure 4 is a rectangular pond located at the south end of the permit area that is approximately 90 feet wide by 582 feet long and 12 feet deep. This impoundment will be incised into the existing ground. Part of the excavation will be used to construct a 12 foot wide embankment. The spillway will be an open channel that will have rip-rap min. 6. This pond will control storm water runoff from a watershed of approximately 96 acres. The cleanout and spillway elevation are 6822' and 6834', respectively. Top of the embankment is at elevation 6838'. Details for the design can be viewed on Drawing 5-31.

Open channel spillway details for impoundments 3 and 4 are provided in Drawing 5-32. These spillways are designed for emergencies and are not expected to be used during normal operations.

The outer slopes of the impoundments will be sloped to a maximum grade of 3h:1v. Inside slopes will be graded to a maximum 2h:1v. The slopes will be graded and revegetated for erosion control.

No underground mine workings exist near or under the impoundment structures; therefore subsidence surveys are not provided.

Geologic data for the area where impoundments will be located consists of mainly fine grained alluvium with high clay content. Seepage from the impoundments is expected to be minimal based on the high clay content of the existing materials. Characterization of the soils is contained in Chapter 2. Acid and Toxic analysis of the soils indicates that water seeping through the alluvium layer will not result in reducing water quality. The acid and toxic analysis for the alluvium can be viewed in Appendix 6-2.

Hydrologic data for the permit area is provided in Appendix 7-1. This data indicates that there will be some seepage through the subsurface that may travel to adjacent drainages. The quantities for this seepage are expected to be minimal and will have minimal impact to the overall hydrologic balance. Even though seepage may occur, analysis of the soils indicates that water quality will not be diminished.

Sedimentation ponds have been designed in compliance with the requirements of R645-301-356.300, R645-301-356.400, R645-301-513.200, R645-301-742.200 through R645-301-742.240, and R645-301-763.

No sedimentation ponds or earthen structures that will remain open are planned.

The sedimentation plan has been designed to comply with the MSHA requirements given under R645-301-513.100 and R645-301-513.200.

The diversions ditches will be utilized to direct runoff from disturbed areas to the sediment impoundments. The channel sizing for the four proposed diversion ditches has been evaluated using the TR-55 method to determine peak flows and the Manning's Equation (ME) to determine appropriate dimensions. The TR-55 method of analysis is the same method used to size impoundments and was utilized in this case to provide a peak flow for each diversion during a 100 year, 24 hour storm event. This peak flow was then input into the ME to determine an appropriate open channel design for minimizing the effects of erosion during peak flows. Similar to the impoundment sizing, the Carlson Software Hydrology module was utilized to perform these calculations. The ditch locations, designs and cross sections can be viewed on Drawings 5-33 and 5-34.

The following table summarizes the inputs and results for each diversion based on flows during a 100 year, 24 hour storm event:

Diversion Ditch Summary							
Ditch	*Base (ft)	Manning's n	Average Slope (%)	Peak Flow (cfs)	Flow Depth (ft)	Velocity (fps)	Freeboard (ft)
1	3.0	0.020	2.8	14.8	0.5	6.8	0.3
2	2.5	0.020	3.5	6.9	0.4	6.0	0.3
3	4.5	0.020	2.4	16.7	0.5	6.3	0.3
4	5.0	0.020	1.8	19.8	0.6	5.4	0.3

*All side slopes are 2h:1v

The sedimentation plan has been designed to comply with the MSHA requirements given under R645-301-513.100 and R645-301-513.200.

These structures will retain sediment within the disturbed area. The diversion ditches are designed in manner that will minimize erosion of the channels and will divert runoff from disturbed areas to the impoundments. These sediment control measures are designed to meet the effluent limitations under R645-301-751.

742.126

Water encountered underground will be stored and treated as needed in underground sumps. It is anticipated most or all of such water would be utilized in the underground mining operation. Excess water would only be discharged after meeting applicable UPDES standards.

742.200 Siltation Structures

Siltation structures have been designed in compliance with the requirements of R645-301-742.

Miscellaneous controls such as silt fence and berms are proposed for specific areas. The proposed locations for these structures are shown on Drawing 5-26. Details associated with these structures can be viewed on Drawings 5-25 through 5-34 and Appendix 5-2.

742.210 General Requirements

Additional contributions of suspended solids and sediment to streamflow or runoff outside the permit area will be prevented to the extent possible using the best technology currently available. Siltation structures for an area will be constructed before beginning any coal mining and reclamation operations in that area and, upon construction, will be certified by a qualified registered professional engineer to be constructed as designed and as approved in the reclamation plan. Any siltation structures which impounds water will be designed, constructed and maintained in accordance with R645-301-512.240, R645-301-514.300, R645-301-515.200, R645-301-533.100 through R645-301-533.600, R645-301-733.220 through R645-301-733.224, and R645-301-743.

The primary controls for limiting suspended solids and sediment to stream flow and runoff outside the permit area is sediment impoundments and diversions ditches. The proposed system described in section 742.110 is designed to control storm water/runoff discharges from the disturbed areas. Discharges from this system are expected to be minimal and infrequent. Discharges that may occur will comply with R645-301-751.

The impoundment and ditch system will be inspected regularly and discharges will be sampled for water quality purposes.

742.214

Water encountered underground will be stored and treated as needed in underground sumps. It is anticipated most or all of such water would be utilized in the underground mining operation. Excess water would only be discharged after meeting applicable UPDES standards.

742.220 Sedimentation Ponds.

742.221.1 The proposed sediment ponds are designed to be used individually

742.221.2 The locations for the sediment ponds were selected to be as near as possible to the disturbed areas and are not located in perennial streams

742.221.3 The ponds are designed and will be constructed and maintained to:

742.221.31 The ponds have been designed with excess capacity by at least 15% to allow for adequate sediment storage volume. The following table provides the design capacities in relation to a 24 hour duration, 100 year storm event:

Sedimentation Impoundment Capacities				
Structure	Storage Required (ac/ft)	Design Storage* (ac/ft)	Percent of requirement	Additional Storage (ac/ft)
1	2.6	3.1	119	0.5
2	1.7	2.3	135	0.6
3	6.3	10.9	173	4.6
4	2.1	5.5	261	3.4
1B	0.5	0.8	160	0.3

These sedimentation ponds will be surveyed at least annually to ensure that sufficient sediment storage is available in the impoundment. Sediment will be removed from the ponds as required based on results from the surveys. Calculations related to these design capacities can be viewed in Appendix 5-2. Stage-Storage curves for each pond can be viewed on Drawings 5-28 through 5-31.

742.221.32 The sedimentation ponds are designed to provide detention for a 100 year, 24 hour duration storm event. Calculations for this design can be viewed in Appendix 5-2. This design standard is expected to keep discharges from the structure at a minimum and allow adequate settlement time to meet Utah and federal effluent limitations. In the event it becomes necessary to decant water to satisfy the required storage volumes, ACD will use a 4" gasoline driven pump to decant excess water. Water will be required to remain in the pond for a minimum of 24 hours prior to the beginning of decant operations and be discharged through the discharge point approved under UPEDES permit No. UTG04027 following all applicable monitoring protocol under this permit.

742.221.33 The sedimentation ponds are designed for a 100 year, 24 hour storm event which significantly exceeds a 10 year, 24 hour precipitation event. The 100 year, 24 hour event in the Alton area is 3.1 inches of precipitation. The 10 year, 24 hour precipitation event in this same location is approximately 2.0 inches of precipitation. The design standard used for the Coal Hollow project is 155% of the precipitation for the required "design event".

742.221.34 Each pond will be constructed with an emergency spillway, should the capacities of the ponds ever be exceeded. These spillways will provide a nondestructive route for storm water discharge, though the capacities of the ponds are not expected to be exceeded. The design capacities of the ponds are expected to contain each storm event and therefore will provide sufficient detention time to meet Utah and federal effluent limitations. The following is a description of each spillway:

Impoundments 3 and 4 will be constructed with open channel spillways. These spillways are designed to discharge a 24 hour duration, 100 year storm event even though they are not expected to be used during normal operations. They will have rip-rap min. 6" to minimize erosion and spillway slopes will not exceed 3h:1v. Drawing 5-32 provides the details for the open channel spillways.

Impoundments 1, 1B and 2 will be constructed with a drop pipe spillway system. Storm water and snow melt that occurs within the associated watersheds will be routed to these impoundments to contain sediment. These impoundments will have the drop-pipe spillways installed which will allow removal of any oil sheens that may result from parking lots, primary roads or maintenance activities by using absorbent materials to remove the sheen. The drop-pipe spillways are 24" diameter pipes that are vertical in the impoundment. These pipes have a metal cover over the end. This cover is recessed over the pipe by at least an inch, with a gap between the cover and the pipe. This leaves a route for water to discharge once the impoundment is full but prevents debris or pollutants located on the water surface from discharging. This system was chosen for these two impoundments based on their locations in relation to the facilities and primary roads. This discharge system will be constructed for precautionary measures only since pollutants are not expected in the impoundments during normal operations.

742.221.35 Regular inspections of the sediment pond system during construction and operations will identify any deficiencies that could cause short circuiting. Design standards for the system will ensure proper functioning during extreme storm events which makes it highly unlikely that issues related to short circuiting could occur during normal operations.

742.221.36 Surveys of the pond system will be conducted at least annually. These surveys will be compared against the required "design event" capacity for each pond. Sediment removal will occur as needed to maintain the required capacity.

742.221.37 Geologic conditions in the areas where sediment ponds will be constructed are suitable to the proposed use. Excessive settling of the ponds is not expected based on the high clay content of the soils. Embankments will be constructed in maximum two foot lifts to promote compaction during the construction process, reducing settling during operations. Supporting data for compaction can be viewed in Appendix 5-1.

742.221.38 Any sod, large roots, and/or frozen soil will be removed from sedimentation ponds. No coal processing will be conducted as part of the Coal Hollow Project; therefore wastes from this type of process will not be present.

742.221.39 Embankments will be constructed in maximum two foot lifts to promote compaction during the construction process, reducing settling during operations. Supporting data for this compaction method can be viewed in Appendix 5-1.

742.222 Sedimentation ponds for the Coal Hollow Project do not meet the size or other qualifying standard for MSHA, 30 CFR 77.216(a).

742.223 Each sedimentation pond will be constructed with a spillway that will function as both the emergency and principle spillway. Each of these spillways will safely discharge a 25 year, 6 hour precipitation event. The following table summarizes the spillway discharge designs in relation to the 25 year, 6 hour precipitation event:

Sediment Impoundment – Spillway Flow Capacities		
Impoundment	Required Spillway Discharge (cfs)	Designed Spillway Discharge (cfs)
1	30.4	37.4
2	0.8	30.5
3	2.8	11.5
4	2.4	11.5
1B	6.06	23.9

The drop pipe spillways for impoundments 1, 1B and 2 will be of nonerodible construction. The open channel spillways for impoundments 3 and 4 will be rip-rap min. 6” and are designed to carry short-term, infrequent flows at non erosive velocities where sustained flows are not expected.

742.224 Either the requirements of 742.223.1 or 742.223.2 will be met for each sediment impoundment.

742.225 No exceptions to the sediment pond location guidance are requested

742.230 Other Treatment Facilities

If other treatment facilities become necessary, they will be designed to treat the 10-year, 24-hour precipitation event unless a lesser design event is approved by the Division based on terrain, climate, other site-specific conditions and a demonstration by the operator that the effluent limitations of R645-301-751 will be met.

No other treatment facilities are planned for the Coal Hollow Project.

742.240 Exemptions

Not Applicable

742.300 Diversions

742.310 General Requirements

742.311 There are no flows from mined areas that have been abandoned prior to May 3, 1978 at the Coal Hollow Project. Diversions at the Coal Hollow Project are planned to minimize water from disturbed areas from directly discharging into drainages without first being treated and to also prevent water from upland, adjacent areas from entering the project area. Four temporary diversion ditches are planned and one temporary diversion of Lower Robinson Creek. Two diversions will be primarily used to route water from upland, undisturbed areas away from the planned disturbed areas. Diversion ditch 2 has been split to minimize the amount of water from upland routed to Pond 2 (see drawing 5-34), 2B will route water from upland to Lower Robinson Creek and 2A will route water from disturbed area to Pond 2. Diversion ditch 4 is planned to direct water from disturbed areas into sediment impoundment Pond 4. The temporary diversion of Lower Robinson Creek is for maximum recovery of coal and will route flows around the mining area. Each temporary diversion has been designed to only carry runoff from areas that will or potentially could be affected by the mining operations, except Lower Robinson Creek diversion which will carry intermittent flows from the upstream watershed. Diversion locations were selected to generally carry runoff to the drainage paths that the precipitation would originally follow. These parameters were followed in the designs to minimize impacts to the overall hydrological balance within the permit and adjacent areas. Diversions will not be used to route water into underground mines. Specific design parameters are discussed in the following sections (R645-301-742.312.1 to 742.314).

The construction of and the operational activities at the proposed alluvial groundwater interceptor trench systems will be performed according to good engineering practices and in compliance with all applicable State and Federal rules. To ensure the safety of construction personnel during construction of the drain systems, work will be performed primarily by the equipment operators from within the operator compartments of the employed equipment. Equipment operators will be adequately trained on the hazards associated with the excavation work at the drain sites. Construction personnel will not be allowed to enter excavated trench areas during the drain construction operations other than as allowed by applicable State and Federal laws and regulations. Where necessary, work outside of equipment operator compartments will be performed in a prudent and safe manner. The excavated drain areas will be promptly backfilled after the drain construction materials have been emplaced.

A physical barrier will be constructed and maintained at alluvial groundwater interceptor drain discharge structures to prevent mine personnel from falling into the discharge structure.

742.312 Each diversion was designed to ensure stability and to minimize erosion. In order to accomplish this standard, the diversions were each designed for peak flows during a 100 year, 24 hour storm event. The following summarizes the steps used:

The channel sizing for the four proposed temporary diversion ditches has been evaluated using the TR-55 method to determine peak flows and the Manning's Equation (ME) to determine appropriate dimensions. The TR-55 method of analysis is the same method used to size impoundments and was utilized in this case to provide a peak flow for each diversion during a 100 year, 24 hour storm event. This peak flow was then input into the ME to determine an appropriate open channel design for minimizing the effects of erosion during peak flows. Similar to the impoundment sizing, the Carlson Software Hydrology module was utilized to perform these calculations. The ditch locations, designs and cross sections can be viewed on Drawings 5-33 and 5-34.

The following table summarizes the inputs and results for each diversion based on flows during a 100 year, 24 hour storm event:

Diversion Ditch Summary							
Ditch	*Base (ft)	Manning's n	Average Slope (%)	Peak Flow (cfs)	Flow Depth (ft)	Velocity (fps)	Freeboard (ft)
1	3.0	0.020	2.8	14.8	0.5	6.8	0.3
2	2.5	0.020	3.5	6.9	0.4	6.0	0.3
3	4.5	0.020	2.4	16.7	0.5	6.3	0.3
4	5.0	0.020	1.8	19.8	0.6	5.4	0.3

*All side slopes are 2h:1v

As shown in the above table, flow depths will be shallow, flow velocity will be manageable for temporary flow conditions and sufficient freeboard will be present during a flood event. These conditions will provide diversion stability, protection against flooding and prevent to the extent possible additional contributions of suspended solids to streamflow outside the permit area. These diversions are designed to comply with all applicable local, Utah and federal laws and regulations. Further details related to the temporary diversion designs can be viewed in Appendix 5-2.

Based on the size of the watershed for Lower Robinson Creek, a different method of analysis was used than the method used for the other diversions. The HEC-1 program was used for this analysis and extra erosion protection has been included as part of the design. The channel was designed to safely handle the flows from a 100 year, 6 hour storm event. This diversion will be further discussed in section 742.320 Diversion of Perennial and Intermittent Streams.

742.313 The four temporary diversions will be reclaimed when they are no longer necessary. This will occur once final reclamation is determined to be sufficient within the project area and the sediment impoundments are no longer needed. This is anticipated to occur in the fourth year of operations.

The Lower Robinson Creek temporary diversion will be constructed in a responsible manner. This diversion will experience some erosion during flood events but erosion rates are expected to be generally less than those in the original channel above and below the diversion. The detailed design for this diversion can be viewed in Drawings 5-20 and 21. Calculations related to this diversion design can be viewed in Appendix 5-3.

742.320 Diversion of Perennial and Intermittent Streams.

742.321 Temporary diversion of one intermittent stream is planned for the Coal Hollow Project. The planned diversion is in a length of the stream that appreciable flows only occur during storm events and snow melt periods. This diversion is necessary to recover coal located in the northwest corner of the project area. The diversion would provide mining in an area that is 22 acres and contains approximately 400,000 tons of recoverable coal. Without this diversion, most of this area could not be mined.

742.322 The original unmodified channel immediately upstream and downstream from the Lower Robinson Creek diversion has excessive erosion and is not in stable condition. The channel has incised deeply and has developed into a channel that has a capacity significantly greater than any anticipated storm events. Since these conditions are not desirable for the area, the diversion design instead has dimensions that are suitable to pass a 100 year, 6 hour storm event in compliance with R645-301-742.323.

742.323 The temporary Lower Robinson Creek diversion has been designed to safely pass a 100 year, 6 hour storm event. The watershed for this drainage is 3.64 square miles and has a peak flow of 83.5 cubic feet per second during a 100 year, 6 hour event. Minimum dimensions for carrying this flow was found to be a channel that has the following dimensions:

Bottom width: 2 feet
Side slopes: 3h:1v
Minimum slope height: 3 feet (1 foot freeboard added)

Details related to the design calculations are provided in Appendix 5-3. Rip-rap will be appropriately placed to minimize erosion of the channel.

Cross sections of the channel design are shown in Drawing 5-21. As shown in the drawing, all sections of the diversions exceed the minimum design standard. A plan view of the diversion design can be viewed in Drawing 5-20.

742.324 Design of the Lower Robinson Creek Diversion has been certified by a qualified registered professional engineer.

742.330 Diversion of Miscellaneous Flows.

742.323

As part of the reclamation process, Lower Robinson Creek will be reconstructed to its approximate original location. The design for this reconstruction is shown on Drawings 5-20A and 5-21A. This design includes considerable improvements to the channel compared to the channel's current condition. The current condition is such that less than 25% of the channel within the disturbed area has a flood plain present and most of the slopes are near the angle of repose with fair to poor vegetative cover. The reconstructed sides of the channel for the entire length reconstructed. Sharp corners in the original alignment have been rounded to sinuous curve shapes and rip-rap will be installed in the bottom section of the channel to minimize erosion. The flood plain will be seeded and covered with erosion matting to control erosion until natural vegetative condition can be attained.

742.331 Diversion of miscellaneous flows is planned using four diversion ditches. Two diversions will be primarily used to route runoff from upland, undisturbed areas away from the planned disturbed areas. Diversion ditch 2 has been split to minimize the amount of water from upland routed to Pond 2 (see drawing 5-34), 2B will route water from upland to Lower Robinson Creek and 2A will route water from disturbed area to Pond 2. Diversion ditch 4 is planned to direct water from disturbed areas into sediment impoundment Pond 3. The locations of these diversions along with the associated watersheds can be viewed on Drawings 5-27, 5-33 and 5-34. Calculations related to the diversions can be viewed in Appendix 5-2.

742.332 Each diversion was designed for stability and to minimize erosion. In order to accomplish this standard, the diversions were each designed for peak flows during a 100 year, 24 hour storm event. The following summarizes the steps used:

The channel sizing for the four proposed temporary diversion ditches has been evaluated using the TR-55 method to determine peak flows and the Manning's Equation (ME) to determine appropriate dimensions. The TR-55 method of analysis is the same method used to size impoundments and was utilized in this case to provide a peak flow for each diversion during a 100 year, 24 hour storm event. This peak flow was then input into the ME to determine an appropriate open channel design for minimizing the effects of erosion during peak flows. Similar to the impoundment sizing, the Carlson Software Hydrology module was utilized to perform these calculations. The ditch locations, designs and cross sections can be viewed on Drawings 5-33 and 5-34.

The following table summarizes the inputs and results for each diversion based on peak flows during a 100 year, 24 hour storm event:

Diversion Ditch Summary							
Ditch	*Base (ft)	Manning's n	Average Slope (%)	Peak Flow (cfs)	Flow Depth (ft)	Velocity (fps)	Freeboard (ft)
1	3.0	0.020	2.8	14.8	0.5	6.8	0.3
2	2.5	0.020	3.5	6.9	0.4	6.0	0.3
3	4.5	0.020	2.4	16.7	0.5	6.3	0.3
4	5.0	0.020	1.8	19.8	0.6	5.4	0.3

*All side slopes are 2h:1v

As shown in the above table, flow depths will be shallow, flow velocity will be manageable for temporary flow conditions and sufficient freeboard will be present during a flood event. These conditions will provide diversion stability, protection against flooding and prevent to the extent possible additional contributions of suspended solids to stream flow outside the permit area. These diversions are designed to comply with all applicable local, Utah and federal laws and regulations. Further details related to the temporary diversion designs can be viewed in Appendix 5-2.

742.333 All four miscellaneous flow diversions planned for the project are temporary and will be reclaimed when no longer necessary for sediment and storm water control. Therefore, the channels must safely pass the peak runoff from a 2 year, 6 hour event. As previously described, these diversions have been designed to pass a 100 year, 24 hour storm event which significantly exceeds this required design standard. Precipitation from a 100 year, 24 hour storm event for this area is 3.1 inches while precipitation for the 2 year, 6 hour event is less than 1 inch.

742.400 Road Drainage

742.410 All Roads

742.411 To ensure environmental protection and safety appropriate for the planned duration and use, limits have been incorporated in the road designs for the Coal Hollow Project. These limits are applied to drainage control and culvert placement/sizing. These limits take into consideration the type and size of equipment planned for the operation.

The following is a description of roads along with the design limits and standards that will be incorporated into construction:

Two primary Mine Haul roads are planned within the permit area. The first road extends from the coal unloading area to the first series of pits along the west side of the property. This road will be utilized for access to pits 1 through 15 (pits shown on Drawing 5-10). This road will be approximately 2,600 feet in length and will be utilized mainly during the first two years of mining. There will be three culverts installed along this road all sized for a 100 year, 6 hour storm event. The first culvert will be across a tributary of Lower Robinson Creek and will be a 36 inch corrugated steel pipe. The second culvert is the main crossing over Lower Robinson Creek and is a 96 inch corrugated steel pipe. Both of these culverts have been sized based on analysis of the Lower Robinson Creek watershed. This analysis can be viewed in Appendix 5-3. The third culvert is a crossing over a diversion ditch that will route water mainly from disturbed areas along the south side of Lower Robinson Creek to a sediment impoundment. This culvert will be a 24 inch corrugated steel pipe.

The second road extends from an intersection with the first road, located just south of the Lower Robinson Creek crossing, and proceeds south to approximately pit 25. This road is approximately 2,500 feet in length and will be used for the south pits 16 through 30. There is one culvert crossing along this road to cross a diversion ditch. This culvert will be a 24 inch culvert.

The following specifications apply to these two Primary Mine Haul roads:

1) Roads will be approximately 80’ in width
2) Approximately a 2% crown
3) Approximately one foot deep cut ditches along shoulders for controlling storm water
4) 18” of crushed rock or gravel for road surfacing
5) Cut and fill slopes of 1.5h:1v
6) Minimum fill over each culvert will be 2 times diameter of culvert
7) Berms placed as necessary along fills

The underground mine portal access and haul road in Pit 10 will also be a primary road. This road is accessed from the main haul road from the coal unloading area. The underground access/haul road will be constructed to the same specifications for the haul roads above, except that the road may be narrowed to a 40 foot width.

The ancillary roads will have similar specifications except surfacing will occur only as needed and may be narrowed to a 40 foot road width.

The location and details for all these roads can be viewed on Drawings 5-3 and 5-22 through 5-24.

In addition to the two primary Mine Haul roads, the road located within the facilities area is also classified as a primary road. This road is planned to be 24 feet wide with 24 inches of compacted sub base and 8 inches of compacted 1 inch minus gravel as surfacing. This road system will have six culverts and selectively located berms to appropriately route water to the two sediment impoundments for the facilities area. The location of these culverts and berms is shown on Drawing 5-3. This road is referred to as "Facilities Roadway" and more details are described in 527.200 along with Drawings 5-22A and 5-22B.

The ramps, benches and equipment travel paths within the active surface mining area are temporary in nature and will be relocated frequently as mining progresses. These temporary travelways are considered part of the pit due to their short term use, and are not individually designed nor engineered. They will be built and maintained to facilitate safe and efficient mine and reclamation operations.

All roads will be maintained on an as needed basis using motor graders, water trucks for dust suppression, and other equipment as necessary. Crushed stone and/or gravel will be used as a surface course for primary roads outside the active mining area, and may be used as needed for ramps and travelways within the pit. Should the roads be damaged by a catastrophic event, such as an earthquake or a flood, repairs will be made as soon as possible after the damage has occurred or the road will be closed and reclaimed.

Cut and fill slopes along the primary roads will be minimal and are not expected to cause significant erosion. The water from roads in the project area will not directly discharge to drainages outside the project area without first being treated by flowing through a sediment impoundment. In locations where there are culvert crossings (i.e. Lower Robinson Creek), the fills slopes will be stabilized by utilizing standard methods such as grass matting or straw wattles.

742.412 No roads will be located in the channel of an intermittent or perennial stream.

742.413 Primary roads constructed utilized during mining operations have been designed and located to route runoff from the roads to the sediment impoundment system. By routing the runoff to this system, sedimentation and flooding downstream resulting from the roads will be minimized. All other roads located within the active mining area will also follow this standard and runoff from the roads will not be directly discharged to drainages outside the permit area.

742.420 Primary Roads

742.421 To minimize erosion, primary roads will be constructed with a rock surface with minimal cut and fill slopes. These roads are located in the most practicable, stable areas within the permit boundary and mostly outside of the designed pits. These locations can be reviewed on Drawing 5-22 through 5-22G. Further descriptions of these roads can be viewed in Section 742.423.1 and 742.111.

742.422 There are no stream fords by primary roads at the Coal Hollow Project.

742.423 Drainage Control

- 742.423.1 Two primary Mine Haul roads are planned within the permit area. The first road extends from the coal unloading area to the first series of pits along the west side of the property. This road will be utilized for access to pits 1 through 15 (pits shown on Drawing 5-10). This road will be approximately 2,600 feet in length and will be utilized mainly during the first two years of mining. There will be three culverts installed along this road all sized for a 100 year, 24 hour storm event. The first culvert will be across a tributary of Lower Robinson Creek and will be a 36 inch corrugated steel pipe. The second culvert is the main crossing over Lower Robinson Creek and is a 96 inch corrugated steel pipe. Both of these culverts have been sized based on analysis of the Lower Robinson Creek watershed. This analysis can be viewed in Appendix A5-3. The third culvert is crossing over a diversion ditch that will route water mainly from disturbed areas along the south side of Lower Robinson Creek to a sediment impoundment. This culvert will be a 24 inch corrugated steel pipe.

  The second road extends from an intersection with the first road, located just south of the Lower Robinson Creek crossing, and proceeds south to approximately pit 25. This road is approximately 2,500 feet in length and will be used for the south pits 16 through 30. There is one culvert crossing along this road to cross a diversion ditch. This culvert will be a 24 inch culvert sized for maximum anticipated flows in the diversion.

  The following specifications apply to these Primary mine haul roads:
  1) Roads will be approximately 80’ in width
  2) Approximately a 2% crown
  3) Approximately one foot deep cut ditches along shoulders for controlling storm water
  4) 18” of crushed rock or gravel for road surfacing
  5) Cut and fill slopes of 1.5 h:1v
  6) Minimum fill over each culvert will be 2 times diameter of culvert

7) Berms placed as necessary along fills

The location and details for Primary Mine Haul roads can be viewed on Drawings 5-3 and 5-22 and 5-23.

In addition to the two roads primary Mine Haul roads, the road located within the facilities area is also classified as a primary road. This road is planned to be 24 feet wide with 24 inches of compacted sub base and 8 inches of compacted 1 inch minus gravel as surfacing. This road system will have four culverts and selectively located berms appropriately placed to route water to the two sediment impoundments for the facilities area. The location of these culverts and berms is shown on Drawing 5-3. This road is referred to as “Facilities Roadway” and more details are described in 527.200 along with Drawings 5-22A and 5-22B.

In addition to the primary roads that will be present during active mining, four additional roads are planned to exist postmining and are also classified as primary roads for this reason.

Roads that will remain postmining are the following:

- Road to Water Well with details shown on Drawing 5-22D
- Road to east C. Burton Pugh property with details shown on Drawing 5-22C
- County Road 136 (K3900) with details on Drawing 5-22E, 5-22F and 5-22G. This County road will be reconstructed within the permit area by Kane County. This reconstruction will occur concurrently with the final stage of reclamation as scheduled on Drawing 5-38 and is expected to be completed by the end of Year 4.
- Road to Swapp Ranch (same specification as the Water Well Road)

The location of these roads is shown on Drawings 5-35 and 5-37 along with the post mining topography. With the exception of the County Road, each road will be graded to complement the surrounding topography and drainages. Details for these roads are provided in the above referenced drawings.

County Road 136 will have a cut ditch on the up gradient side of the road as appropriate. The culvert located at the crossing of Lower Robinson Creek will remain. One culvert will be added at Station 21+66 as shown on Drawing 5-22E. For further details related to reestablishment of County Road 136, refer Drawings 5-22 through 5-22G and 5-35.

742.423.2 Drainage pipes and culverts will be constructed on a minimum 2% grade to avoid plugging. Minimum fill over culverts will be 2 times the diameter of the culvert itself to avoid collapsing. Grades going in and out of each culvert will be similar to the grade of the culvert itself to avoid erosion at the inlet and outlet.

742.423.3 Drainage ditches have been designed to pass a 100 year 24 hour storm event which will prevent uncontrolled drainage over the road surface and embankment. The watersheds associated with drainage in the project area are each relatively small (less than 400 acres) and are not expected to sustain flows that would carry significant debris through the project area. Therefore, trash racks and debris basins are not expected to be necessary at the Coal Hollow Project.

742.423.4 One natural intermittent stream channel is planned to be diverted. This channel is referred to as Lower Robinson Creek and this diversion will be temporary. A section of this stream runs across an area that is planned for mining.

The Lower Robinson Creek diversion has been designed to safely pass a 100 year, 6 hour storm event. The watershed for this drainage is 3.64 square miles and has a peak flow of 83.5 cubic feet per second during a 100 year, 6 hour event. Minimum dimensions for carrying this flow were found to be a channel that has the following dimensions:

Bottom width: 2 feet
Side slopes: 3h:1v
Minimum slope height: 3 feet (1 foot freeboard added)

Details related for the design calculations are provided in Appendix 5-3. Rip-rap will be appropriately placed to minimize erosion of the channel.

Cross sections of the channel design are shown in Drawing 5-21. As shown in the drawing, all sections of the diversions exceed the minimum design standard. A plan view of the diversion design can be viewed in Drawing 5-20. This diversion design is in accordance with R645-301-731.100 through R645-301-731.522, R645-301.600, R645-301-731.800, R645-301-742.300, and R645-301-751.

Design of the Lower Robinson Creek Diversion has been certified by a qualified registered professional engineer.

742.423.5 All stream crossings are planned to be culverts designed to pass the 100 year, 6 hour storm event. There are no plans to use fords as stream crossings.

743 IMPOUNDMENTS

743.100 General Requirements

Five temporary impoundments are planned at the Coal Hollow Project. Design for these structures are shown in Drawings 5-28 through 5-32. These impoundments do not meet the criteria for Class B or C dams as specified in the U.S. Department of Agriculture, Natural Resources Conservation Service Technical Release 60.

743.110 None of the impoundments meet the criteria of MSHA, 30 CFR 77.216(a).

743.120 A professional engineer experienced in the design and construction of impoundments with assistance from a geotechnical expert has used current, prudent, engineering practices to design the proposed impoundments.

The plans have been certified and a detailed geotechnical analysis has been provided in Appendix 5-1. The certifications, drawings and cross sections can be viewed in Drawings 5-25 through 5-31 and Appendices 5-1 and 5-2.

Each impoundment is designed with a minimum freeboard of 2 feet. Based on the size of the impoundments and the relatively small size of the associated watersheds, this amount of freeboard will be sufficient to prevent overtopping from waves and/or storm events. These impoundments do no meet the criteria for Class B or C dams.

743.130

Each impoundment will be constructed with a spillway that will function as both the emergency and principle spillway. Each of these spillways will safely discharge a 25 year, 6 hour precipitation event. The following table summarizes the spillway discharge designs in relation to the 25 year, 6 hour precipitation event:

Sediment Impoundment – Spillway Flow Capacities		
Impoundment	Required Spillway Discharge (cfs)	Designed Spillway Discharge (cfs)
1	30.4	37.4
2	0.8	30.5
3	2.8	11.5
4	2.4	11.5
1B	6.06	23.9

The drop pipe spillways for impoundments 1, 1B and 2 will be of nonerodible construction. The open channel spillways for impoundments 3 and 4 will be 6” minimum Rip Rap lined and are designed to carry short-term, infrequent flows at non erosive velocities where sustained flows are not expected.

The impoundments at the Coal Hollow project do not meet the criteria for either Class B or C dams or MSHA CFR 77.216 (a).

743.140

A professional engineer or specialist experienced in the construction of impoundments will inspect impoundments. Inspections will be made regularly during construction, upon completion of construction, and at least yearly until removal of the structure or release of the performance bond. The qualified registered professional engineer will promptly, after each inspection, provide to the Division, a certified report that the impoundment has been constructed and maintained as designed and in accordance with the approved plan and the R645 Rules. The report will include discussion of any appearances of instability, structural weakness or other hazardous conditions, depth and elevation of any impounded waters, existing storage capacity, any existing or required monitoring procedures and instrumentation and any other aspects of the structure affecting stability. A copy of the report will be retained at or near the mine site.

The MRP does not contemplate construction of any impoundments meeting the NRCS Class B or C criteria for dams in TR-60, or the size or other criteria of 30 CFR Sec. 77.216.

743.200

No permanent impoundments are planned.

743.300

Design capacities for spillways exceed the 25 year, 6 hour event. The design capacities are provided in the table located in section R645-301-743.130.

744 DISCHARGE STRUCTURES

744.100

Each pond will be constructed with an emergency spillway, should the capacities of the ponds ever be exceeded. These spillways will provide a nondestructive route for storm water discharge, though the capacities of the ponds are not expected to be exceeded. The design capacities of the ponds are expected to contain each storm event and therefore will provide sufficient detention time to meet Utah and federal effluent limitations. The following is a description of each spillway:

Impoundments 3 and 4 will be constructed with open channel spillways. These spillways are designed to discharge a 24 hour duration, 100 year storm event even though they are not expected to be used during normal operations. They will have rip-rap min. 6” to minimize erosion and spillway slopes will not exceed 3h:1v. Drawing 5-32 provides the details for the open channel spillways.

Impoundments 1, 1B and 2 will be constructed with a drop pipe spillway system. Storm water and snow melt that occurs within the associated watersheds will be routed to these impoundments to contain sediment. These impoundments will have the drop-pipe spillways installed which will allow removal of any oil sheens that may result from parking lots, primary roads or maintenance activities by using absorbent materials to remove the sheen. The drop-pipe spillways are 24” diameter pipes that are vertical in the impoundment. These pipes have a metal cover over the end. This cover is recessed over the pipe by at least an inch, with a gap between the cover and the pipe. This leaves a route for water to discharge once the impoundment is full but prevents debris or pollutants located on the water surface from discharging. This system was chosen for these two impoundments based on their locations in relation to the facilities and primary roads. This discharge system will be constructed for precautionary measures only since pollutants are not expected in the impoundments during normal operations.

The drop pipe spillways for impoundments 1, 1B and 2 will be of nonerodible construction. The open channel spillways for impoundments 3 and 4 will be rip-rap min. 6” and are designed to carry short-term, infrequent flows at non erosive velocities where sustained flows are not expected. These designs will minimize erosion and disturbance to the hydrologic balance.

Details related to these designs can be viewed in Drawings 5-28 through 5-32.

744.200

Standard engineering design procedures have been used in the design of the discharge structures along with standard mining industry best management practices that are commonly used at surface mining operations.

745 Disposal of Excess Spoil

745.100 General Requirements

Excess spoil will be placed in designated disposal areas within the permit area, in a controlled manner to minimize the adverse effects of leachate and surface water runoff from the fill on surface and ground waters; ensure permanent impoundments are not located on the completed fill. Small depressions may be created if approved by the Division if they are needed to retain moisture or minimize erosion, create and enhance wildlife habitat or assist revegetation, and if they are not incompatible with the stability of the fill; and adequately cover or treat excess spoil that is acid- and toxic-forming with nonacid nontoxic material to control the impact on surface and ground water is accordance with R645-301-731.300 and to minimize adverse effects on plant growth and the approved postmining land use.

If the disposal area contains springs, natural or manmade water courses or wet weather seeps, the fill design will include diversions and underdrains as necessary to control erosion, prevent water infiltration into the fill and ensure stability.

Details of proposed excess spoil disposal plans are presented in Chapter 5, Section 535 of this MRP and are summarized below.

A geotechnical analysis has been completed for the proposed excess spoil structure. This analysis estimates the long-term safety factor to be 1.6 to 1.7 based on the proposed design. Following proper construction practices of building the structure in maximum four foot lifts and meeting 85% compaction based on the standard Procter will ensure that the structure will be stable under all conditions of construction. This construction will occur only in the designated excess spoil area as shown on Drawing 5-3 and 5-35. The fill will be placed with end dump haul trucks and lifts will be constructed using dozers. High precision GPS systems will be regularly utilized to check grades and appropriate lift thickness. The geotechnical analysis for this structure can be viewed in Appendix 5-1.

The excess spoil is planned to be placed in an area where natural grades range from 0 to 5%. This is one of the most moderately sloping locations in the Permit Area. Stability of this structure is estimated to be 1.6 to 1.7 based on the Appendix 5-1.

Geotechnical borings were completed in the foundation of the proposed disposal area. Laboratory analysis of these borings has also been completed. Details of this analysis can be viewed in Appendix 5-1.

Permanent slopes for the proposed excess spoil will not exceed 3h:1v (33 percent), therefore no keyway cuts have been proposed in the design. Appendix 5-1 details the stability analysis for the proposed structure.

Excess spoil will not be disposed of in underground mine workings.

Horizontal lifts will not exceed four feet in thickness unless otherwise approved by the Division. The lifts will be concurrently compacted to meet 85% of the standard Procter. The geotechnical analysis (Appendix 5-1), provides information showing that these construction standards will provide mass stability and will prevent mass movement during and after construction. The excess spoil will be graded to provide drainage similar to original flow patterns. Topsoil and subsoil as designated in Chapter 2 will be removed and separated from other materials prior to placement of spoil.

A description of the character of the bedrock and any adverse geologic conditions in presented in Appendix 5-1.

Spring and seep survey information is provided on Drawing 7-1. There are no springs or seeps identified in the excess spoil area.

There are no historical underground mining operations in the proposed excess spoil area. There are also no future underground operations proposed.

There are no rock chimneys or drainage blankets proposed.

A stability analysis including strength parameters, pore pressures and long-term seepage conditions is presented together with all supporting data in Appendix 5-1.

Neither rock-toe buttresses nor key-way cuts are required under R645-301-535.112 or R645-301-535.113.

No valley fills or head-of-hollow fills are proposed.

No durable rock fills are proposed.

No disposal of waste on preexisting benches is planned

The excess spoil structure and fill above approximate original contour are the only alternative specifications proposed. A geotechnical analysis has been completed for this proposal and can be viewed in Appendix 5-1. All other mined areas will be restored to approximate original contour.

745.200 Valley Fills and Head-of-Hollow Fills

Valley fills and head-of-hollow fills are not anticipated in the Coal Hollow Mine permit area.

745.300. Durable Rock Fills.

Durable rock fills are not anticipated in the proposed Coal Hollow Mine permit area.

745.400. Preexisting Benches.

The disposal of excess spoil through placement on preexisting benches is not anticipated in the proposed Coal Hollow Mine permit area.

746. COAL MINE WASTE

746.100. General Requirements.

No coal mine waste is anticipated.

746.200. Refuse Piles.

No refuse piles associated with coal mine waste are anticipated.

746.300. Impounding structures.

No impounding structures associated with coal mine waste are anticipated.

746.330. Drainage control.

No coal mine waste and associated drainage control is anticipated.

746.400. Return of Coal Processing Waste to Abandoned Underground Workings.

No coal mine processing waste is anticipated~~, nor are any underground workings planned~~ to be placed in underground workings.

747. DISPOSAL OF NONCOAL WASTE

747.100

Noncoal mine waste, including but not limited to grease, lubricants, paints, flammable liquids, garbage, machinery, lumber and other non combustible materials generated during coal mining and reclamation operations will be temporarily placed in covered dumpsters. This waste will be regularly removed from the project area and disposed of at a state approved solid waste disposal site outside the project area.

747.200

Noncoal mine waste will be stored in a metal, covered dumpster which will prevent storm precipitation or runoff from coming in contact with the waste.

747.300

No noncoal mine waste will be disposed of within the permit area with the exception perforated piping used in the construction of Alluvial Ground Water Drains . This will be left in place as mining advances. This perforated piping will be covered in place approximately 20' to 30' below the final reclaimed surface. All other waste materials (ie. metal culvert) associated with the Alluvial Ground Water Drains will be removed and disposed of in a State-approved solid waste disposal site. Also, concrete pads for the generator and fan utilized in the underground operation will remain and will be covered with approximately 120' of overburden.

748. Casing and Sealing of Wells.

Wells constructed for monitoring groundwater conditions in the proposed Coal Hollow Mine permit and adjacent area, including exploration holes and boreholes used for water wells or monitoring wells, will be designed to prevent contamination of groundwater and surface-water resources and to protect the hydrologic balance. A diagram depicting typical monitoring well construction methods is shown in Drawing 7-11. Monitoring wells will include a protective hydraulic seal immediately above the screened interval, an annular seal plugging the borehole above the hydraulic seal to near the ground surface, and a concrete surface seal extending from the top of the hydraulic seal to the ground surface which is sloped away from the well casing to prevent the entrance of surface flows into the borehole area. Well casings will protrude above the ground surface a sufficient height so as to minimize the potential for the entrance of surface water or other material into the well. A steel surface protector with a locking cover will be installed at monitoring wells to prevent access by unauthorized personnel. Where there is potential for damage to monitoring wells, the wells will be protected through the use of barricades, fences, or other protective devices. These protective devices will be periodically inspected and maintained in good operating conditions. Monitoring wells will be locked in a closed position between uses.

When no longer needed for monitoring or other use approved by the Division upon a finding of no adverse environmental or health and safety effects, or unless approved for transfer as a water well under R645-301-731.100 through R645-301-731.522 and R645-301-731.800, each well will be capped, sealed, backfilled, or otherwise properly managed, as required by the Division in accordance with R645-301-529.400, R645-301-631.100, and R645-301-748. Permanent closure measures will be designed to prevent access to the mine workings by people, livestock, fish and wildlife, machinery and to keep acid or other toxic drainage from entering ground or surface waters.

If a water well is exposed by coal mining and reclamation operations, it will be permanently closed unless otherwise managed in a manner approved by the Division.

Permanent closure and abandonment of water wells greater than 30 feet in depth will be in accordance with the requirements of "Administrative Rules for Water Well Drillers", State of Utah, Division of Water Rights or other applicable state regulations. Abandonment of wells will be performed by a licensed water well driller. The wells to be abandoned will be completely filled using neat cement grout, sand cement grout, unhydrated bentonite, or bentonite grout, or other materials approved by the Utah State Engineer's office. Alternatively, the well may be abandoned using a different procedure upon approval from the Utah State Engineer's office.

Abandonment materials will be introduced at the bottom of the well or required sealing interval and placed progressively upward to the top of the well. The casing will be severed a minimum of 2 feet below the ground surface. A minimum of 2 feet of compacted native material will be placed above the abandoned well upon completion.

Within 30 days of the completion of well abandonment procedures, a report will be submitted to the State Engineer by the responsible licensed driller giving data related to the abandonment of the well. This shall include the name of the licensed driller or other person(s) performing abandonment procedures, name of well owner at the time of abandonment, the address or location of the well by section, township, and range, abandonment materials and equipment used, water right or file number covering the well, the final disposition of the well, and the date of completion.

Exploration holes and boreholes will be backfilled, plugged, cased, capped, sealed, or otherwise managed to prevent acid or toxic contamination of water resources and to minimize disturbance to the prevailing hydrologic balance. Exploration holes and boreholes will be managed to ensure the safety of people, livestock, fish and wildlife, and machinery.

If a water well is exposed by coal mining and reclamation operations, it will be permanently closed unless otherwise managed in a manner approved by the Division.

If any exploration boreholes are to be used as monitoring wells or water wells, these will meet the provisions of R645-301-731

Boreholes will be backfilled to within 1 foot of the land surface with concrete or other materials approved by the Division as necessary to prevent contamination of groundwater or surface-water resources or to protect the prevailing hydrologic balance. The upper approximately 1 foot will be backfilled with native materials to facilitate reclamation (see Drawing 6-11). Exploration holes and boreholes that may be uncovered during mining and reclamation activities will be permanently closed unless approved for water monitoring or otherwise managed in a manner approved by the Division.

750 **PERFORMANCE STANDARDS**

All coal mining and reclamation operations will be conducted to minimize disturbance to the hydrologic balance within the permit and adjacent areas, to prevent material damage to the hydrologic balance outside the permit area and support approved postmining land uses in accordance with the terms and conditions of the approved permit and the performance standards of R645-301 and R645-302. Mining operations will be conducted to assure the protection or replacement of water rights in accordance with the terms and conditions of the approved permit and the performance standards of R645-301 and R645-302.

751. Water Quality Standards and Effluent Limitations.

Discharges of water from areas disturbed by coal mining and reclamation operations will be made in compliance with all Utah and federal water quality laws and regulations and with effluent limitations for coal mining promulgated by the U.S. Environmental Protection Agency set forth in 40 CFR Part 434.

Discharges from the Coal Hollow project are expected to be minimal based on the storm water and runoff controls that are described in R645-301-740. These structures are designed to contain large storm events without discharging runoff. Any runoff that does discharge will be treated through the sediment pond system.

Discharges from the proposed alluvial groundwater interceptor drain systems will be made in compliance with all applicable Utah and federal water quality laws and regulations. The proposed drain systems have been designed to intercept and discharge natural, un-contaminated up-gradient alluvial groundwater. The water from the alluvial groundwater intercept drain system will be collected in a gravel-packed underground drainage collection system and conveyed through pipes to a steel/concrete discharge structure from which the water will be discharged via pumping through a discharge hose to the discharge location. By managing the water in this matter, the potential for contamination of the water will be minimized. Prior to the initial discharge of water from newly constructed alluvial groundwater interceptor trench systems to receiving waters, the system will be adequately developed/pumped to remove residual fine-grained sediments that might be present in the system prior to discharge to receiving waters. Only suitable, uncontaminated groundwater will be discharged to the outfall location. The water quality and discharge rates from the alluvial groundwater intercept system will be monitored as per the requirements of the UPDES permit.

752. Sediment Control Measures

Sediment control measures will be located, maintained, constructed and reclaimed according to the plans and designs given under sections R645-301-732, R645-301-742 and R645-301-760. Plans and designs are described in these sections.

752.100

Siltation structures and diversions will be located, maintained, constructed and reclaimed according to plans and designs given under R645-301-732, R645-301-742 and R645-301-763. Plans and designs are described in these sections.

752.200. Road Drainage

Roads will be located, designed, constructed, reconstructed, used, maintained and reclaimed according to R645-301-732.400, R645-301-742.400 and R645-301-762 and to achieve the following:

Control or prevent erosion, siltation and the air pollution attendant to erosion by vegetating or otherwise stabilizing all exposed surfaces in accordance with current, prudent engineering practices;

Control or prevent additional contributions of suspended solids to stream flow or runoff outside the permit area;

Neither cause nor contribute to, directly or indirectly, the violation of effluent standards given under R645-301-751;

Minimize the diminution to or degradation of the quality or quantity of surface- and ground-water systems; and

Refrain from significantly altering the normal flow of water in streambeds or drainage channels.

All plans and designs to meet these standards are described in the above referenced sections and on Drawings 5-22 through 5-24.

753**.** Impoundments and Discharge Structures

Impoundments and discharge structures will be located, maintained, constructed and reclaimed to comply with R645-301-733, R645-301-734, R645-301-743, R645-301-745 and R645-301-760. Plans and designs are described in these sections.

754. Disposal of Excess Spoil, Coal Mine Waste and Noncoal MineWaste.

Disposal areas for excess spoil, coal mine waste and noncoal mine waste will be located, maintained, constructed and reclaimed to comply with R645-301-735, R645-301-736, R645-301-745, R645-301-746, R645-301-747 and R645-301-760. Plans and designs are described in these sections.

755. Casing and Sealing of Wells

All wells will be managed to comply with R645-301-748 and R645-301-765. Water monitoring wells will be managed on a temporary basis according to R645-301-738.

Wells constructed for monitoring groundwater conditions in the proposed Coal Hollow Mine permit and adjacent area, including exploration holes and boreholes used for water wells or monitoring wells, will be designed to prevent contamination of groundwater and surface-water resources and to protect the hydrologic balance. A diagram depicting typical monitoring well construction methods is shown in Drawing 7-11. Monitoring wells will include a protective hydraulic seal immediately above the screened interval, an annular seal plugging the borehole above the hydraulic seal to near the ground surface, and a concrete surface seal extending from the top of the hydraulic seal to the ground surface which is sloped away from the well casing to prevent the entrance of surface flows into the borehole area. Well casings will protrude above the ground surface a sufficient height so as to minimize the potential for the entrance of surface water or other material into the well. A steel surface protector with a locking cover will be installed at monitoring wells to prevent access by unauthorized personnel. Where there is potential for damage to monitoring wells, the wells will be protected through the use of barricades, fences, or other protective devices. These protective devices will be periodically inspected and maintained in good operating conditions. Monitoring wells will be locked in a closed position between uses.

When no longer needed for monitoring or other use approved by the Division upon a finding of no adverse environmental or health and safety effects, or unless approved for transfer as a water well under R645-301-731.100 through R645-301-731.522 and R645-301-731.800, each well will be capped, sealed, backfilled, or otherwise properly managed, as required by the Division in accordance with R645-301-529.400, R645-301-631.100, and R645-301-748. Permanent closure measures will be designed to prevent access to the mine workings by people, livestock, fish and wildlife, machinery and to keep acid or other toxic drainage from entering ground or surface waters.
Water wells less than thirty feet deep are not regulated by the Utah Division of Water Rights. The permanent closure and abandonment of water wells less than 30 feet deep will be accomplished by filling the well casing with neat cement grout, sand cement grout, unhydrated bentonite, or bentonite grout, or other appropriate materials. The well casing will then be cut off below the ground surface and native materials placed over the abandoned well site.

If a water well is exposed by coal mining and reclamation operations, it will be permanently closed unless otherwise managed in a manner approved by the Division.

Permanent closure and abandonment of water wells greater than 30 feet in depth will be in accordance with the requirements of "Administrative Rules for Water Well Drillers", State of Utah, Division of Water Rights or other applicable state regulations. Abandonment of wells will be performed by a licensed water well driller. The wells to be abandoned will be completely filled using neat cement grout, sand cement grout, unhydrated bentonite, or bentonite grout, or other materials approved by the Utah State Engineer's office. Alternatively, the well may be abandoned using a different procedure upon approval from the Utah State Engineer's office.

Abandonment materials will be introduced at the bottom of the well or required sealing interval and placed progressively upward to the top of the well. The casing will be severed a minimum of 2 feet below the ground surface. A minimum of 2 feet of compacted native material will be placed above the abandoned well upon completion.

Within 30 days of the completion of well abandonment procedures, a report will be submitted to the State Engineer by the responsible licensed driller giving data related to the abandonment of the well. This shall include the name of the licensed driller or other person(s) performing abandonment procedures, name of well owner at the time of abandonment, the address or location of the well by section, township, and range, abandonment materials and equipment used, water right or file number covering the well, the final disposition of the well, and the date of completion.

Exploration holes and boreholes will be backfilled, plugged, cased, capped, sealed, or otherwise managed to prevent acid or toxic contamination of water resources and to minimize disturbance to the prevailing hydrologic balance. Exploration holes and boreholes will be managed to ensure the safety of people, livestock, fish and wildlife, and machinery.

If a water well is exposed by coal mining and reclamation operations, it will be permanently closed unless otherwise managed in a manner approved by the Division.

If any exploration boreholes are to be used as monitoring wells or water wells, these will meet the provisions of R645-301-731

Boreholes will be backfilled to within 1 foot of the land surface with concrete or other materials approved by the Division as necessary to prevent contamination of groundwater or surface-water resources or to protect the prevailing hydrologic balance. The upper approximately 1 foot will be backfilled with native materials to facilitate reclamation (see Drawing 6-11). Exploration holes and boreholes that may be uncovered during mining and reclamation activities will be permanently closed unless approved for water monitoring or otherwise managed in a manner approved by the Division.

760. RECLAMATION

761. GENERAL REQUIREMENTS

Before abandoning a permit area or seeking bond release, the mine will ensure that all temporary structures are removed and reclaimed, and that all permanent sedimentation ponds, diversions, impoundments and treatment facilities meet the requirements of R645-301 and R645-302 for permanent structures, have been maintained properly and meet the requirements of the approved reclamation plan for permanent structures and impoundments. The mine will renovate such structures if necessary to meet the requirements of R645-301 and R645-302 and to conform to the approved reclamation plan.

762. ROADS

A road not to be retained for use under an approved postmining land use will be reclaimed immediately after it is no longer needed for coal mining and reclamation operations, including restoring the natural drainage patterns, and reshaping all cut and fill slopes to be compatible with the postmining land use and to complement the drainage pattern of the surrounding terrain.

The post mining land configuration is shown on 5-35 along with postmining road locations. Cuts and fills for the reclaimed roads will be minimal which allows for minor construction to grade roads to the approximate landform that existed prior to disturbance.

763. SILTATION STRUCTURES

763.100.

Siltation structures will be maintained until removal is authorized by the Division and the disturbed area has been stabilized and revegetated. In no case will the structure be removed sooner than two years after the last augmented seeding.

All impoundments will be reclaimed at the end of operations. The estimated timeline for removal of these structures are shown on Drawing 5-38. Expected removal is year ~~four~~ seven of the mining and reclamation process. In areas where soils are not stabilized following the removal of these sediment impoundments, silt fence will be appropriately installed and maintained to provide sediment control until stable conditions are met.

763.200.

When the siltation structure is removed, the land on which the siltation structure was located will be regraded and revegetated in accordance with the reclamation plan and R645-301-358, R645-301-356, and R645-301-357.

No permanent sedimentation impoundments are planned.

764. STRUCTURE REMOVAL

The application will include the timetable and plans to remove each structure, if appropriate.

All impoundments will be reclaimed at the end of operations. The estimated timeline for removal of these structures are shown on Drawing 5-38. Expected removal is year four of the mining and reclamation process. In areas where soils are not stabilized following the removal of these sediment impoundments, silt fence will be appropriately installed and maintained to provide sediment control until stable conditions are met.

The facilities will be fully reclaimed at the end of mining operations with the exception of the water well shown on Drawing 5- 8B. The final contour for this area can be viewed on Drawing 5-35.

The reclamation sequence and final landform can be viewed on Drawings 5-35 and 5-38.

765. PERMANENT CASING AND SEALING OF WELLS

Wells constructed for monitoring groundwater conditions in the proposed Coal Hollow Mine permit and adjacent area, including exploration holes and boreholes used for water wells or monitoring wells, will be designed to prevent contamination of groundwater and surface-water resources and to protect the hydrologic balance. A diagram depicting typical monitoring well construction methods is shown in Drawing 7-11. Monitoring wells will include a protective hydraulic seal immediately above the screened interval, an annular seal plugging the borehole above the hydraulic seal to near the ground surface, and a concrete surface seal extending from the top of the hydraulic seal to the ground surface which is sloped away from the well casing to prevent the entrance of surface flows into the borehole area. Well casings will protrude above the ground surface a sufficient height so as to minimize the potential for the entrance of surface water or other material into the well. A steel surface protector with a locking cover will be installed at monitoring wells to prevent access by unauthorized personnel. Where there is potential for damage to monitoring wells, the wells will be protected through the use of barricades, fences, or other protective devices. These protective devices will be periodically inspected and maintained in good operating conditions. Monitoring wells will be locked in a closed position between uses.

When no longer needed for monitoring or other use approved by the Division upon a finding of no adverse environmental or health and safety effects, or unless approved for transfer as a water well under R645-301-731.100 through R645-301-731.522 and R645-301-731.800, each well will be capped, sealed, backfilled, or otherwise properly managed, as required by the Division in accordance with R645-301-529.400, R645-301-631.100, and R645-301-748. Permanent closure measures will be designed to prevent access to the mine workings by people, livestock, fish and wildlife, machinery and to keep acid or other toxic drainage from entering ground or surface waters.

Water wells less than thirty feet deep are not regulated by the Utah Division of Water Rights. The permanent closure and abandonment of water wells less than 30 feet deep will be accomplished by filling the well casing with neat cement grout, sand cement grout, unhydrated bentonite, or bentonite grout, or other appropriate materials. The well casing will then be cut off below the ground surface and native materials placed over the abandoned well site.

If a water well is exposed by coal mining and reclamation operations, it will be permanently closed unless otherwise managed in a manner approved by the Division.

Permanent closure and abandonment of water wells greater than 30 feet in depth will be in accordance with the requirements of "Administrative Rules for Water Well Drillers", State of Utah, Division of Water Rights or other applicable state regulations. Abandonment of wells will be performed by a licensed water well driller. The wells to be abandoned will be completely filled using neat cement grout, sand cement grout, unhydrated bentonite, or bentonite grout, or other materials approved by the Utah State Engineer's office. Alternatively, the well may be abandoned using a different procedure upon approval from the Utah State Engineer's office.

Abandonment materials will be introduced at the bottom of the well or required sealing interval and placed progressively upward to the top of the well. The casing will be severed a minimum of 2 feet below the ground surface. A minimum of 2 feet of compacted native material will be placed above the abandoned well upon completion.

Within 30 days of the completion of well abandonment procedures, a report will be submitted to the State Engineer by the responsible licensed driller giving data related to the abandonment of the well. This shall include the name of the licensed driller or other person(s) performing abandonment procedures, name of well owner at the time of abandonment, the address or location of the well by section, township, and range, abandonment materials and equipment used, water right or file number covering the well, the final disposition of the well, and the date of completion.

Exploration holes and boreholes will be backfilled, plugged, cased, capped, sealed, or otherwise managed to prevent acid or toxic contamination of water resources and to minimize disturbance to the prevailing hydrologic balance. Exploration holes and boreholes will be managed to ensure the safety of people, livestock, fish and wildlife, and machinery.

If a water well is exposed by coal mining and reclamation operations, it will be permanently closed unless otherwise managed in a manner approved by the Division.

If any exploration boreholes are to be used as monitoring wells or water wells, these will meet the provisions of R645-301-731

Boreholes will be backfilled to within 1 foot of the land surface with concrete or other materials approved by the Division as necessary to prevent contamination of groundwater or surface-water resources or to protect the prevailing hydrologic balance. The upper approximately 1 foot will be backfilled with native materials to facilitate reclamation (see Drawing 6-11). Exploration holes and boreholes that may be uncovered during mining and reclamation activities will be permanently closed unless approved for water monitoring or otherwise managed in a manner approved by the Division.

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CHAPTER 7

R645-301-700. HYDROLOGY

711. **GENERAL REQUIREMENTS**

711.100 – 711.500 Contents

This chapter provides a description of the hydrology and hydrogeology of the proposed Coal Hollow Mine permit and adjacent area (including the 85.88-acre Dame Lease IBC area). Specifically, this permit section includes descriptions of existing hydrologic resources according to R645-301-720, proposed operations and potential impacts to the hydrologic balance according to R645-301-730, methods and calculations utilized to achieve compliance with the hydrologic design criteria and plans according to R645-301-740, applicable hydrologic performance standards according to R645-301-750, and reclamation activities according to R645-301-760.

This information is presented in subsequent sections of this chapter and in Appendix 7-1. Appendix 7-1 includes a comprehensive characterization of groundwater and surface-water systems in the proposed Coal Hollow permit and adjacent areas (including the 85.88-acre Dame Lease IBC), recommendations for groundwater and surface-water monitoring, and the results of a field investigation regarding the potential for alluvial valley floors in the proposed Coal Hollow Mine permit and adjacent area. It should be noted that Appendix 7-1 may be updated periodically in the future as additional hydrologic and hydrogeologic data become available.

712 **CERTIFICATION**

All cross sections, maps, and plans have been prepared per R645-301-512. Compliance with this section has been completed and certifications are available on all Drawings. The cross sections and maps that are included in this permit application and are required to be certified have been prepared by or under the direction of a qualified, registered, professional engineer or a professional geologist, with assistance from experts in related fields such as hydrology, geology and landscape architecture.

713 **INSPECTION**

Impoundments will be inspected as described under R645-301-514.300. Designs for proposed impoundments in the proposed Coal Hollow permit area are shown in Drawings 5-25 through 5-31 and Appendices A5-1 and A5-2. No impoundments or sedimentation ponds meeting the size or other qualifying criteria of MSHA, 30 CFR 77.216(a) exist or are planned within the proposed Mine Permit Area.

A professional engineer or specialist experienced in the construction of impoundments will inspect impoundments. Inspections will be made regularly during construction, upon completion of construction, and at least yearly until removal of the structure or release of the performance bond. The qualified registered professional engineer will promptly, after each inspection, provide to the Division, a certified report that the impoundment has been constructed and maintained as designed and in accordance with the approved plan and the R645 Rules. The report will include discussion of any appearances of instability, structural weakness or other hazardous conditions, depth and elevation of any impounded waters, existing storage capacity, any existing or required monitoring procedures and instrumentation and any other aspects of the structure affecting stability. A copy of the report will be retained at or near the mine site.

720 ENVIRONMENTAL DESCRIPTION

721 GENERAL REQUIREMENTS

The existing, pre-mining hydrologic resources within the permit and adjacent areas that may be affected by coal mining and reclamation operations (including the 85.88-acre Dame Lease IBC) are described in Appendix 7-1 and are summarized below.

<u>Groundwater Resources</u>

A spring and seep survey of the proposed Coal Hollow Mine permit and surrounding area (that includes the 85.88-acre Dame Lease IBC) has been conducted by Petersen Hydrologic, LLC (see sub-appendix B of Appendix 7-1). The locations of springs and seeps in the proposed permit and adjacent area are shown on Drawing 7-1. Seasonal discharge and field water quality measurements for springs and seeps in the proposed Coal Hollow Mine permit and adjacent area have been submitted electronically to the Utah Division of Oil, Gas and Mining Utah Coal Mining Water Quality Database (UDOGM, 2007). Baseline discharge and water quality data for groundwater resources in the proposed Coal Hollow Mine permit and adjacent area are have also been submitted electronically to the Utah Division of Oil, Gas and Mining, Utah Coal Mining Water Quality Database (UDOGM, 2007). Locations of baseline monitoring stations are shown on Drawing 7-2. Locations of water rights in and adjacent to the proposed Coal Hollow Mine permit area (including the 85.88-acre Dame Lease IBC area) are shown on Drawing 7-3. Water rights data from the proposed Coal Hollow Mine permit and adjacent area are detailed in Appendix 7-3. A plot showing potentiometric levels in alluvial groundwater systems in the proposed Coal Hollow Mine permit and adjacent area (including the 85.88-acre Dame Lease IBC) is presented in Drawing 7-13.

There are no domestic water supply springs or wells in the proposed mine disturbance area. However, springs that provide water for domestic and livestock use are located on and adjacent to the proposed permit area (See Drawing 7-2 and Appendix 7-3). Spring SP-23 (Spring House Spring) is located on the eastern boundary of the proposed Coal Hollow Mine permit area. Spring SP-23 is a groundwater seepage area with both discrete and diffuse flow with a total discharge that is usually about one gallon per minute or less. Historically, this seepage area was used as a domestic water source for the Pugh property (personal communication, Burton Pugh, 2008). However, water from SP-23, which is not developed, has not been used for this purpose for many years.

Spring SP-35 is located along the eastern boundary of the proposed Coal Hollow Mine permit area. Discharge from SP-35 averages less than 0.25 gallons per minute and is occasionally used for drinking water during camping trips or visits to the Pugh property (personal communication, Burton Pugh, 2008). However, there is apparently no associated domestic water right associated with this spring.

Two additional springs, which are located more distant from the proposed mining areas are also used for domestic water supply sources. These include SP-40, which is located at the Sorensen property, and SP-33, which is located at the Johnson property. Springs with stockwatering rights are listed in Appendix 7-3

Some lands east of and adjacent to the proposed Coal Hollow Mine permit area have historically been irrigated using water from alluvial springs. However, irrigation from these springs was apparently limited to home gardens and a few fruit trees. No irrigation of these lands (other than some yard watering at the Swapp Ranch house) is currently occurring nor has it occurred in at least the past 10 years (Personal communication, Burton Pugh, 2008; Richard Dames, 2007). Additionally, limited irrigation of lands occurs east of the proposed Coal Hollow permit area using surface waters derived from runoff from the adjacent Paunsaugunt Plateau area. Irrigation of these lands is largely limited to years with appreciable precipitation and stream runoff (Personal communication, Darlynn Sorensen, 2008).

Groundwater discharge occurs from springs and seeps in the upland areas of the Paunsaugunt Plateau east of the permit area (Tilton, 2001; Appendix 6-3). However, these springs discharge from rock strata that are topographically and stratigraphically up-gradient of and considerable distances from the proposed Coal Hollow Mine permit area. Consequently, groundwater systems in these areas will not be impacted by mining activities and these are not considered further here.

Groundwater resources in the Tropic Shale and underlying Dakota Formation in the permit and adjacent area are not appreciable. During drilling activities in the proposed Coal Hollow Mine permit and adjacent area, appreciable groundwater inflows were not encountered in the Tropic Shale. Other than a single seep (SP-37; Drawing 7-1) which discharges at a rate of less than 0.05 gpm from an apparent fracture system in a sandy horizon along the eastern margin of lower Sink Valley, no springs or seeps with measurable discharge have been identified in the Tropic Shale. The lack of appreciable groundwater discharge in the Tropic Shale is a result of the poor water transmitting properties of the marine shale unit. While sandstone units occur stratigraphically higher in the Tropic Shale in the surrounding area, in areas proposed for surface mining, the unit present consists of a fairly uniform sequence of soft shale, silty shale, and claystone with minor siltstone horizons. Competent sandstone strata in the Tropic Shale overlying proposed mining areas was not observed during drilling. The Tropic Shale acts as a barrier impeding downward migration of groundwater in the proposed Coal Hollow Mine permit and adjacent area where it is present. The unit also forms a basal confining layer for alluvial groundwater systems in the proposed permit area.

Groundwater discharge from the Dakota Sandstone in the permit and adjacent area is also meager. The Dakota Formation consists of shaley strata interbedded with lenticular, fine- to medium-grained sandstone and coal. Because of the pervasiveness of interbedded low-permeability horizons in the formation and the vertical and lateral discontinuity of sandstone horizons, the potential for vertical and horizontal movement of groundwater is limited. While no springs discharge from the Dakota Formation in the permit area, a spring with a discharge of about 1 gpm and displaying little seasonal variability in discharge (SP-4; Drawing 7-1) discharges from an apparent fault zone in the Dakota Formation approximately 1.1 miles south of the proposed Coal Hollow permit area. Additionally, two seeps with discharges of less than 0.05 gpm (SP-27 and SP-34; Drawing 7-1) seep from the Dakota Formation in lower Sink Valley more than ½ mile south of the proposed Coal Hollow Mine permit area. The results of slug testing performed on wells screened in the Smirl coal seam indicate relatively low values of hydraulic conductivity for the coal seam (Table 7-8). In much of the proposed mining area, the coal seam is dry (UDOGM, 2007). Thus, appreciable migration of groundwater through the Smirl coal seam is not anticipated.

No water wells are known to exist in the Tropic Shale or Dakota Formation in the proposed Coal Hollow Mine permit and adjacent area (including the 85.88-acre Dame Lease IBC area), demonstrating the inability of these formations to transmit useful quantities of water to wells. Groundwaters from the Tropic Shale and Dakota Formation do not contribute measurable baseflow to streams in the proposed permit and adjacent area (at least at the surface in stream channels).

Natural groundwater discharge in the permit and adjacent area occurs primarily from alluvial sediments. Alluvial discharge occurs both as discrete springs and seeps (Drawing 7-1) and also locally as diffuse seepage to the surface. Groundwater discharge areas in the proposed Coal Hollow Mine permit and adjacent area are shown on Drawing 7-4 (see also photograph section). The area of most appreciable alluvial groundwater discharge occurs in central Sink Valley in the northwest quarter of Section 29, T39S, R5W (see Drawing 7-4; groundwater discharge area A). The alluvial groundwater system in this area exists under artesian conditions, resulting from the presence of a considerable thickness of sloping, low permeability clayey sediments overlying coarser, water-bearing alluvial sediments at depth (See Drawing 6-3). The artesian alluvial groundwater system in Sink Valley is likely recharged via mountain-front-recharge along the flanks of the Paunsaugunt Plateau to the east and north of the proposed Coal Hollow Mine permit area. This artesian alluvial groundwater system that exists along the eastern margins of Sink Valley is likely continuous from near mountain-front recharge areas southward along the eastern margins of Sink Valley to the lower portion of Sink Valley. Discharge from the alluvial groundwater systems in and adjacent to the proposed Coal Hollow Mine permit area occurs primarily in two areas (Drawing 7-4). In the northwest quarter of Section 29, T39S, R5W, considerable natural discharge from the alluvial groundwater system occurs through springs and seeps (Drawing 7-4; groundwater discharge area A). Minor discharge from several flowing artesian wells also occurs in this area. The artesian alluvial groundwater system in eastern Sink Valley also likely provides recharge to the clayey alluvial sediments in the southwestern portion of the valley in the proposed Coal Hollow Mine permit area. Discharge from the alluvial groundwater system in groundwater discharge area A area results in decreases to the amount of water in storage in the alluvial groundwater system and also decreases in artesian hydraulic pressure in the aquifer.

Appreciable discharge from the alluvial groundwater system also occurs in lower Sink Valley in the northwest quarter of Section 32, T39S, R5W (see Drawing 7-4; groundwater discharge area B). Sink Valley constricts markedly in this area, which forces shallow alluvial groundwaters flowing down the valley to discharge at the land surface as springs, seeps, and diffuse discharge to the surface (i.e., there is a significant decrease in the cross-sectional area of the alluvial sediments). Groundwater discharge in this area occurs from diffuse seepage to the surface and also as discharges to two springs and several small seeps (Drawing 7-1).

Much of the alluvial groundwater in Sink Valley likely ultimately leaves the valley via evapotranspiration. This conclusion is based on the observation that there is very rarely any discharge of surface water (at least at the surface in the channel) in Sink Valley Wash below Sink Valley (See site SW-9; Drawing 7-2; UDOGM, 2007). The clayey, low-permeability sediments present at the surface over most of Sink Valley also impede appreciable infiltration of precipitation and snowmelt waters into the deeper subsurface. Hence, groundwater recharge to the lower half of the Sink Valley sediments (including the proposed Coal Hollow Mine permit area) likely occurs primarily via horizontal migration of alluvial groundwaters from up-gradient areas.

Flowing artesian groundwater conditions are also observed in monitoring wells screened near the base of the alluvial sediments in the northwest corner of Section 32 T39S, R5W. It is probable that the artesian alluvial groundwater system in Section 29, T39S, R5W is continuous with that in the northwest corner of Section 32. It should be noted that within the proposed Coal Hollow permit area, artesian conditions were not observed in monitoring wells. While the thickness of the alluvial sediments in the artesian groundwater system east of the proposed Coal Hollow permit area range up to 150 feet thick, the thickness of alluvium overlying areas with mineable coal in the proposed Coal Hollow permit area generally does not exceed about 50 feet and in many locations it is considerably thinner.

Natural discharge of alluvial groundwater in the Robinson Creek drainage area is meager. This condition is largely due to the presence of the elevated ridge of impermeable Tropic Shale bedrock associated with the Sink Valley Fault that dissects and effectively isolates the alluvium east of the fault from that west of the fault (See Drawing 6-1). Because of the low permeability of the Tropic Shale, this condition apparently forces alluvial groundwater east of the Tropic Shale ridge to flow to the south toward Sink Valley that would otherwise report to the Robinson Creek drainage. During high flow conditions in the alluvial groundwater system east of the Tropic Shale ridge, minor amounts of groundwater "overtop" the bedrock ridge and drain via surface flow over the Tropic Shale bedrock, where it either recharges shallow alluvial sediments to the west of the fault or is lost to evapotranspiration. The influence of the Tropic Shale ridge is readily evident in field observations, with marked differences in vegetation and soil moisture being apparent on opposite sides of the ridge. During low-flow conditions, discharge from the overtopping of the bedrock ridge has generally not been observed. Isolated areas of soil wetness and shallow perched alluvial groundwater systems that exist west of the bedrock ridge in the northeast corner of Section 30 and the southeast corner of Section 19, T39S, R5W are likely sourced via this mechanism.

Seepage of alluvial groundwater into the deeply incised lower Robinson Creek stream channel occurs near the contact with the underlying Dakota Formation in the southeast quarter of Section 19, T39S, R5W. This water is likely related to saturated alluvial deposits underlying the Robinson Creek stream channel. The alluvial groundwater emerges near where the stream channel intersects the alluvial groundwater system. It is noteworthy that the location of the emergence of alluvial water in the channel has varied somewhat over time. The bank seepage water is likely alluvial groundwater that seeps to the surface where the incised stream channel intersects the potentiometric surface of the alluvial groundwater system. Typically, this is near the contact with the underlying Dakota Formation bedrock in the bottom of the stream channel. Because of the seasonal changes in the elevation of the potentiometric head in the alluvial groundwater system, the location of the bank seepage is variable over time (i.e. the variability in the bank seepage locations are likely controlled primarily by temporal variability in potentiometric levels in the alluvial groundwater system rather than by fixed, permeability-controlled groundwater preferential pathways in the aquifer skeleton). Consequently, the bank seepage locations are not well-defined point sources, but rather dynamic seepage fronts along this general reach of the stream.

The Robinson Creek stream channel above this location is almost always dry (except for in direct response to torrential precipitation events or during the springtime runoff season during wet years. This seepage of alluvial water in the Lower Robinson Creek channel is typically about 5 to 10 gpm or less and is routinely monitored at monitoring station SW-5 (Drawing 7-2).

Information on water quality for groundwaters and surface-waters has been uploaded into the Utah Division of Oil, Gas and Mining, Utah Coal Mining Water Quality Database (UDOGM, 2007) and is summarized and described in Appendix 7-1.

Appreciable spatial variability exists in water quality in groundwaters and surface waters in the proposed Coal Hollow permit and adjacent area. Stiff diagrams depicting solute compositions and overall water quality for groundwaters and surface waters in the proposed Coal Hollow Mine permit and adjacent area are shown in Appendix 7-1. Important water quality characteristics for groundwaters are summarized below.

Groundwater Source	Chemical type	TDS (mg/L)
Alluvial groundwaters, coarse-grained system east of proposed permit area	Calcium-magnesium-bicarbonate	380 mg/L to 500 mg/L typically, Little seasonal variability
Alluvial groundwaters in south sink valley	Variable, magnesium-bicarbonate sulfate, calcium-magnesium-bicarbonate	450 mg/L to 3,600 typically, Highly variable based on season and climate for shallow systems, less variability in deeper system
Dakota Formation, fault groundwater system south of proposed permit area	Sodium-bicarbonate	500 mg/L to 600 mg/L typically, Little seasonal variability

It is apparent that the overall water quality of alluvial groundwater degrades from the mountain-front recharge water to the artesian groundwater system east of the proposed Coal Hollow permit area to the non-artesian shallow alluvial groundwater systems located in the more distal portions of Sink Valley. These changes are due to groundwater interaction with soluble minerals in the primarily Tropic Shale-derived sediments that make up the shallow alluvial materials in the proposed permit area.

This down-gradient degradation in water quality is shown graphically on Drawing 7-5. In Drawing 7-5, the average specific conductance values in μS/cm for representative springs and seeps in the Sink Valley drainage are plotted on the map as circles with the circle areas being proportional to the specific conductance average for the spring or seep. The specific conductance information used in generating Drawing 7-5 has been submitted electronically to the Division's hydrology database (UDOGM, 2007). It is readily apparent from Drawing 7-5 that the specific conductance (which is a reflection of the dissolved solids concentration) is degraded from the mountain-front recharge water (represented by stream SW-8) to the artesian alluvial groundwater system in the northwest quarter of Section 29, T5W, R39S, to the alluvial groundwaters in the southern portion of Sink Valley below the Coal Hollow Mine permit area.

Specific conductance values were used for plotting in Drawing 7-5 because specific conductance values are available for all springs and seeps, while laboratory chemical analyses are available for only some of the springs and seeps. Stiff (1951) diagrams for selected springs along this geochemical evolutionary pathway are shown on Figure 14 of Appendix 7-1. It is apparent from the Stiff diagrams and from geochemical information submitted to the Division (UDOGM, 2007) that the mountain-front recharge water (represented by monitoring site SW-8 in upper Swapp Hollow) is of the calcium-magnesium-bicarbonate chemical type with an average TDS concentration of 333 mg/L. Groundwater downgradient of the mountain-front recharge areas in the artesian alluvial groundwater system in Section 29, T5W, R39S, is also of the calcium-magnesium-bicarbonate chemical type, with an average TDS concentration at artesian well Y-61 of 400 mg/L. Further downgradient in the artesian alluvial groundwater system in Section 29, the geochemical composition at SP-8 is of the calcium-magnesium-bicarbonate chemical type with a somewhat increased TDS concentration of 425 mg/L. In the lower portions of Sink Valley in Section 32, T5W, R39S, the chemical quality of the alluvial groundwater is appreciably degraded relative to that in the upper portions of the groundwater system. At spring SP-6, the composition of the alluvial groundwater is seasonally variable and is of the magnesium-bicarbonate-sulfate, or calcium-magnesium-bicarbonate-sulfate chemical type. The TDS concentrations at SP-6 average 970 mg/L. The chemical composition of alluvial groundwater at SP-33 is of a geochemical type similar to that at SP-6, although TDS concentrations are somewhat lower, averaging 795 mg/L. The spatial variability apparent in the TDS concentrations in the alluvial groundwater in Section 32 is likely related to flushing effects resulting from higher groundwater fluxes through zones of increased permeability in the alluvium. It is noteworthy that groundwater in the gravelly zones in the deeper alluvial east of the permit area in Section 32 monitored at the 85-foot deep well LS-85 is considerably lower in TDS concentration with an average of 457 mg/L. The lower TDS concentrations of artesian alluvial groundwater in the deeper, coarser-grained portions of the alluvium are likely attributable to the isolation of these groundwaters from the shallow, clayey, Tropic Shale derived alluvial sediment in the near-surface alluvial groundwaters.

The appreciable temporal variability in the solute geochemical compositions of the shallow alluvial groundwaters in Section 32 is likely attributable to seasonal and climatic variability in the groundwater flux rate through these systems and corresponding variability in rock/water ratios and residence time in the evaporate mineral rich Tropic Shale derived shallow alluvial sediments present in this portion of Sink Valley. Alluvial groundwaters in the deeper portions of Sink Valley to the east in Section 32 are part of a larger, more continuous groundwater system that is hydraulically isolated from overlying shallow recharge sources, and consequently have not exhibited similar temporal variability in solute geochemical composition.

Surface Water Resources

Surface water resources in the proposed Coal Hollow Mine permit and adjacent area (including the 85.88-acre Dame Lease IBC) are described in Appendix 7-1 and are summarized below.

Surface waters in the proposed Coal Hollow Mine permit and adjacent area are tributary to Kanab Creek. Surface waters in the northern portion of the proposed permit and adjacent area drain into the Robinson Creek and upper Kanab Creek drainages. Surface waters in the southern portion of the proposed permit and adjacent area drain into the Sink Valley Wash drainage which is tributary to Kanab Creek about 6 miles below the proposed Coal Hollow Mine permit area. Surface water drainages in the permit and surrounding areas are shown in Appendix 7-1. Surface water baseline monitoring stations are shown on Drawing 7-2. Locations of surface-water water rights in and adjacent to the proposed Coal Hollow Mine permit and adjacent area are shown on Drawing 7-3. Water rights data from the proposed Coal Hollow Mine permit and adjacent area are detailed in Appendix 7-3.

Information on water quality for groundwaters and surface-waters has been uploaded into the Utah Division of Oil, Gas and Mining, Utah Coal Mining Water Quality Database (UDOGM, 2007) and is summarized and described in Appendix 7-1.

Surface waters in Kanab Creek are used for stock watering and crop irrigation in the irrigable lands adjacent to Kanab Creek west of the proposed Coal Hollow Mine permit area. Discharge in Kanab Creek measured near the town of Alton (SW-1) is seasonally dependent and largely influenced by upstream water use. Discharge in Kanab Creek monitored at SW-1 typically ranges from 10 cfs or less during the springtime runoff period to 1 cfs or less during the summertime.

Discharge in Lower Robinson Creek drainage is meager. Other than during the springtime runoff event in wet years or during torrential precipitation events, flow has not been observed at monitoring stations SW-4 and SW-101 (Drawing 7-2). Discharge at the lower monitoring site on Lower Robinson Creek (SW-5; Drawing 7-2) is meager. The small discharge occasionally present at SW-5 is derived from the seepage of alluvial groundwater into the Lower Robinson Creek stream channel between monitoring sites SW-101 and SW-5.

Tributaries to the Sink Valley Wash drainage in the proposed Coal Hollow Mine permit and adjacent areas include (from north to south) Water Canyon, an unnamed drainage south of Water Canyon in Section 21 T39S, R5W, and Swapp Hollow. Discharge rates in these drainages are highly seasonally dependent (UDOGM, 2007; Appendix 7-1). Discharges in the Water Canyon and Swapp Hollow drainages are intermittent or perennial in nature with discharge peaks occurring during the springtime runoff season and much lower flows occurring during the late summer and fall months. Discharge in the unnamed drainage in Section 21 T39S, R5W is ephemeral.

The water quality and discharge characteristics of surface waters in the proposed Coal Hollow Mine permit and adjacent area are presented in UDOGM (2007) and described in Appendix 7-1. Solute compositions of stream waters are also depicted graphically as Stiff diagrams in Appendix 7-1. The solute compositions of surface waters in the proposed Coal Hollow Mine permit and adjacent area are summarized below.

Source	Chemical type	TDS (mg/L)
Robinson Creek/Dry Fork	Calcium-magnesium-bicarbonate	300 mg/L typical
Lower Robinson Creek	Variable, magnesium-sulfate-bicarbonate	300 – 3,000 mg/L typical, dependent on discharge
Swapp Hollow	Calcium-magnesium-bicarbonate	250-350 mg/L typical
Kanab Creek	Magnesium-calcium-bicarbonate-sulfate during high flow, variable during low-flow, variability likely due largely to interaction with Tropic Shale soils and irrigation return flows	500-1,300 mg/L typical, Variable dependent on season and irrigation use
Sink Valley Wash	Magnesium-calcium-bicarbonate	600 -1,500 mg/L typical, variable dependent on discharge

Considerable seasonal variability exists in the solute compositions of stream waters in Kanab Creek in the proposed Coal Hollow Mine permit and adjacent area (UDOGM, 2007; Appendix 7-1). During low-flow conditions, interactions between stream waters and Tropic Shale or Tropic Shale-derived alluvial sediments likely result in increased TDS concentrations. Return flow from irrigated fields and interactions with soils rich in soluble minerals also likely contribute to increased TDS concentrations in the summertime. During the spring runoff season, high surface-water flows that originate from the adjacent upland areas dominate the flow in the channel. The TDS concentrations of Kanab Creek waters during high-flow conditions are thus lower than during the low-flow season. Much less seasonal variability in solute content in surface water flows from the mountain stream in Swapp Hollow (UDOGM, 2007; Appendix 7-1). This condition is likely attributable to the fact that the stream in Swapp Hollow, which originates on geologic formations overlying the Tropic Shale, has considerably less contact with the Tropic Shale than does Kanab Creek. Additionally, there are no known irrigation diversions or returns above the stream monitoring point (SW-8; Drawing 7-2) in Swapp Hollow.

722 CROSS SECTIONS AND MAPS

722.100 A map showing the locations of springs and seeps in the proposed Coal Hollow Mine permit and adjacent area (including the 85.88-acre Dame Lease IBC area) is presented in Drawing 7-1. A map showing potentiometric levels in alluvial groundwater systems in the proposed Coal Hollow and adjacent areas (including the 85.88-acre Dame Lease IBC) is presented in Drawing 7-13. It is important to note that the alluvial groundwater potentiometric contours depicted in Drawing 7-13 are not representative of a laterally or vertically continuous groundwater system. Within the proposed Coal Hollow Mine permit and adjacent area, appreciable portions of the alluvial sediments are not saturated. Additionally, perched groundwater conditions are present in many locations in the alluvium in the area. In other words, the alluvial groundwater systems in the proposed Coal Hollow Mine permit and adjacent area are not a single, interconnected aquifer. Rather, there exist several areas of saturated alluvium, which may or may not be in good hydraulic communication with adjacent areas. Consequently, it is not possible or meaningful to construct a true potentiometric contour map in the strict sense. Consequently, it is not appropriate to evaluate regional potentiometric trends over large distances or to infer precise groundwater flow directions or hydraulic gradients in the alluvial groundwater system based on Drawing 7-13. The alluvial groundwater system potentiometric map presented in Drawing 7-13 is useful for evaluating approximate local potentiometric conditions and general saturation trends.

722.200 <u>Location of surface water bodies</u>
Within the proposed Coal Hollow Mine permit and adjacent area, no significant natural ponds or lakes occur. The locations of springs and streams are shown in Drawing 7-1. Many small earthen impoundments and ponds have been created to store surface-water runoff and spring discharge water for stock watering and irrigation use. Some of these impoundments were created by constructing straight or semi-circular berms across ephemeral surface water drainages to impound surface runoff. Because of the character of the alluvial sediments, some of the ponds have become filled with sediment over time and the holding capacities have diminished. The locations of ponds and associated conveyance ditches are shown on Drawing 7-7.

722.300 <u>Baseline monitoring stations</u>

Baseline monitoring stations are shown on Drawing 7- 2. A map showing the locations of monitoring wells in the proposed Coal Hollow permit and adjacent area is presented in Drawing 7-12 and on Figure 12 of Appendix 7-1. Drawing 7-12 also shows monitoring stations from which baseline hydrologic data were collected in previous studies. Monitoring station locations, elevations, and other details are presented in Table 7-1.

722.400 Location of water wells

Water well locations are shown in Drawing 7-2 and Drawing 7-12. Well construction details and locations are presented in Table 7-2.

722.500 Contour map(s) of disturbed area(s)

Surface contours representing the existing land surface configuration of the proposed permit area (including potentially disturbed areas) are shown on Drawing 5-1 and the post mining land configuration is shown on 5-35. Cross sections with both these landforms are shown on Drawing 5-36. The premining landform, with exception of the Facilities area and Lower Robinson Creek, are from an aerial flight that was limited to a five foot contour interval. Therefore, contours have been interpolated down to a 2 foot level using the available aerial flight information. This interpolation provides accuracy for the Division to make the necessary determinations. The Facilities area and portions of Lower Robinson Creek are actual survey data to the accuracy of 2-foot contours.

723 SAMPLING AND ANALYSIS

Water quality sampling and analyses have been and will be conducted according to the "Standard Methods for the Examination of Water and Wastewater" or EPA methods listed in 40 CFR Parts 136 and 434. Information regarding laboratory analytical methods utilized in performing water quality analyses at the analytical laboratories has been submitted to the Utah Division of Oil, Gas and Mining, Utah Coal Mining Water Quality Database (UDOGM, 2007).

724 BASELINE INFORMATION

Baseline groundwater, surface-water, geologic, and climatologic data (including information for the 85.88-acre Dame Lease IBC area) are described in Appendix 7-1 and summarized below.

724.100 Groundwater Information

The location of wells and springs in the proposed Coal Hollow Mine permit and adjacent area (including the 85.88-acre Dame Lease IBC) are shown on Drawings 7-1 (Spring and seep survey map), 7-2 (Baseline monitoring locations), and 7-12 (Monitoring well location map). Groundwater rights in and around the proposed Coal Hollow Mine permit area are shown on Drawing 7-3 and tabulated in Appendix 7-3.

Seasonal quality and quantity of groundwater and usage is presented in Appendix 7-1 and UDOGM (2007). Baseline discharge and water quality data have been submitted electronically to the Utah Division of Oil, Gas and Mining, Utah Coal Mining Water Quality (UDOGM, 2007).

Baseline monitoring of groundwater resources in and around the proposed Coal Hollow permit area have been carried out by several entities. Previous hydrologic studies of the region have been made in the Alton Coal Field area by Goode (1964, 1966), Sandberg (1979), Cordova (1981), and Plantz (1983). Selected hydrologic data collected in conjunction with these studies have been incorporated into the hydrologic analysis and baseline data included in this permit application.

During the 1980's, extensive monitoring of groundwater resources in the proposed permit and surrounding areas was performed by Utah International, Inc. Utah International Inc.'s groundwater monitoring activities included the construction of numerous groundwater monitoring wells, aquifer testing activities, and the performance of discharge, water level, and field and laboratory water quality monitoring of springs, seeps, and wells. These baseline monitoring activities were performed as part of a proposed coal mine permitting action in the Alton Coal Field. Ultimately, the proposed coal mining action did not proceed. Relevant monitoring information from the Utah International, Inc. baseline monitoring activities have been included as supplemental baseline data included in this permit application.

Commencing in the 2nd quarter of 2005, regular quarterly baseline monitoring of groundwater resources has been commissioned by Alton Coal Development, LLC. Baseline monitoring of springs, seeps, and groundwater wells in and around the proposed Coal Hollow Mine permit area have been routinely performed. Data collected in the baseline monitoring activities have been submitted electronically to the Utah Division of Oil, Gas and Mining, Utah Coal Mining Water Quality Database (UDOGM, 2007).

Baseline potentiometric information from wells has been input into the DOGM database. For non-flowing-artesian wells, this information has been input in a depth-to-water-relative-to-the-top-of-the-well-casing format using units of feet. For wells experiencing flowing artesian conditions, the potentiometric data are reported to the database in feet as a height-of-the-potentiometric-surface-above-the-top-of-the-well-casing format expressed as a negative number (which makes the flowing-artesian and non-flowing-artesian potentiometric measurements directly comparable). For both conditions, the reported measurements can be directly converted to an absolute water elevation by subtracting the reported value from the elevation of the top of the well casing.

The potentiometric head in monitoring wells experiencing flowing-artesian conditions is measured either 1) by temporarily extending the height of the well casing and allowing the water level to stabilize and the performing a height of the water column measurement (where the artesian pressure is small), or 2) by using a pressure gauge to measure the shut-in artesian pressure in the well and then converting that number to an equivalent height in feet.

During December 2006 and January 2007 an extensive drilling and monitoring well construction program was implemented. This hydrogeologic program included the installation of 30 groundwater monitoring wells in and adjacent to the proposed Coal Hollow Mine permit area. The focus of the drilling program was to characterize the stratigraphy and hydrogeologic properties of alluvial groundwater systems in and adjacent to proposed mining areas. Aquifer characterization of the alluvial groundwater system was also performed using pump testing and slug testing techniques. Investigative methods utilized and the results of the analysis of the data are described in Appendix 7-1.

Descriptions of alluvial groundwater systems in the mine permit and surrounding areas, including information on quantity and quality of alluvial groundwaters, are presented in Appendix 7-1. Estimated rates of alluvial groundwater inflow into the mine are presented in Table 7-9. Additional information on alluvial groundwater inflows is provided in Section 728.333.

As indicated in the Alluvial Groundwater Management Plan for the Coal Hollow Mine (See Appendix 7-9), the land surface overlying proposed alluvial groundwater interceptor drains will be contoured to match the existing surrounding topography. Accordingly, alterations of existing surface-water drainage patterns should not occur.

Water monitoring information provided to the Division demonstrates that water levels in shallow alluvial groundwater systems in the Coal Hollow Mine area do respond to seasonal and climatic variability. However, as described in Appendix 7-1, the shallow alluvial sediments in the Coal Hollow Mine area are dominated by silts, clays, and fine-grained sands which generally do not have appreciable hydraulic conductivity. Because of the overall pervasiveness of silts, clays, and fine-grained sands in the alluvial system in the mine permit area, rates of alluvial groundwater migration are generally not rapid (See information provided in Table 7-9). (It should be emphasized that alluvial groundwater flow velocities in the coarser-grained alluvial systems in areas adjacent to proposed mining areas generally to the east and south are known to be appreciably greater). In cross-sectional exposures of saturated alluvial deposits in the up-gradient highwalls at the Coal Hollow Mine, only modest quantities of groundwater discharge have been observed. Although the alluvial sediments are largely saturated, where the saturated alluvial sediments have been exposed, sustained discharges of alluvial groundwater of more than a few gallons per minute are generally not observed. While discharges on the magnitude of a few gallons per minute have been observed in a fluvial channel system intercepted by the mine (which deposits contained sands, silts, and gravels), the much more pervasive fine-grained alluvial sediments where exposed were observed to weep only very minor, un-measurable quantities of water through the highwall. During a site visit on June 2, 2011, Petersen Hydrologic (2011) estimated that the total flow from the 600-foot-long exposure of clayey, silty alluvium in the mine highwall was less than 1 gpm. The total discharge from the exposed fluvial channel system was measured at 5.5 gpm. The total flow from a recently constructed, 870-foot-long up-gradient alluvial groundwater intercept trench was only 13.4 gpm. What this demonstrates is that, while the alluvial sediments adjacent to the mine openings are largely saturated, the presence of low permeability sediments in the alluvium limits the potential for the alluvial groundwaters to rapidly flow into the mine pit areas.

It should be emphasized here, however, that although highly permeable, saturated, coarse-grained alluvial sediments have not been intersected at the Coal Hollow Mine to date, the potential for intercepting such sediments is always present in heterogeneous mountain-front alluvial deposits. Appreciably greater inflow volumes are possible from such sediments were they to be encountered unexpectedly at the Coal Hollow Mine.

The overall low hydraulic conductivity of most of the alluvial sediments in proposed mining areas generally precludes the effective dewatering of saturated alluvial deposits adjacent to proposed mining areas through the use of vertical dewatering wells. For this reason, as described in the proposed alluvial groundwater management plan for the Coal Hollow Mine, horizontal drain systems (with large, long horizontal “screened” intervals in targeted strata to collect intercepted alluvial groundwater) are proposed for use in dewatering the alluvial sediments adjacent to proposed mining areas.

724.200 Surface Water Information

The locations of streams, stock watering ponds, and conveyance ditches in the proposed Coal Hollow Mine permit and adjacent area (including the 85.88-acre Dame Lease IBC area) are shown on Drawing 7-7. Surface-water rights in and adjacent to the proposed Coal Hollow Mine permit area are shown on Drawing 7-3 and tabulated in Appendix 7-3. Surface-water discharge rates and water quality data have been submitted electronically to the Utah Division of Oil, Gas and Mining, Utah Coal Mining Water Quality Database (UDOGM, 2007). Additional surface-water information is provided in Appendix 7-1.

It is not anticipated currently that discharge from the proposed Coal Hollow Mine will be necessary. Where necessary, alluvial groundwater that may be intercepted by mining will be placed in drains and diverted away from disturbed areas and discharged (i.e., as groundwater dewatering). However, a Utah UPDES discharge permit will be obtained so that if discharge of mine water becomes necessary, it can be discharged in accordance with the UPDES discharge permit. The exact locations of mine water discharge points will be established upon issuance of the UPDES discharge permit. Any mine discharge water will be placed in either the Lower Robinson Creek drainage or the Sink Valley Wash drainage. Both of these drainages are tributary to Kanab Creek.

As described in R645-301-728.320, acid drainage is not expected from the proposed mining operation. This is due to the pervasiveness of carbonate minerals in the mine environment that will neutralize any acid produced.

Seasonal quality and quantity of groundwater and usage is described herein and in Appendix 7-1. Baseline discharge and water quality data have been submitted electronically to the Utah Division of Oil, Gas and Mining, Utah Coal Mining Water Quality (UDOGM, 2007).

Baseline monitoring of surface-water resources in and around the proposed Coal Hollow permit area have been carried out by several entities. Previous hydrologic studies of the have been made in the Alton Coal Field area by Goode (1964, 1966), Sandberg (1979), Cordova (1981), and Plantz (1983). Selected hydrologic data collected in conjunction with these studies have been incorporated into the baseline data as part of this permit application.

During the 1980's, extensive monitoring of surface water resources in the proposed permit and surrounding areas was performed by Utah International, Inc. Utah International Inc.'s groundwater monitoring activities included the operation of continuous recording stations on selected streams, and the performance of routine surface-water discharge measurements and field and laboratory water quality analyses. These baseline monitoring activities were performed as part of a proposed coal mine permitting action in the Alton Coal Field. Ultimately, the proposed coal mining action did not proceed. Relevant monitoring information from the Utah International, Inc. baseline monitoring activities have been included as supplemental baseline data as part of this permit application. Commencing in the 2nd quarter of 2005, regular quarterly baseline monitoring of surface-water resources has been commissioned by Alton Coal Development, LLC. Baseline monitoring of surface-waters in and around the proposed Coal Hollow permit area, including surface-water discharge measurements and field and laboratory water quality analyses, have been routinely performed.

All surface waters in the proposed Coal Hollow Mine permit and adjacent area are tributary to the Kanab Creek drainage. Surface-water monitoring stations from which baseline data have been collected are shown on Drawing 7-2 and include the following:

Sink Valley Wash drainage

SW-8 (Swapp Hollow above proposed mining areas), SW-7 (unnamed drainage in Section 21, T39S, R5W), RID-1 (irrigation diversion of water from Water Canyon drainage above proposed mining areas), SW-6 (headwaters of unnamed tributary to lower Sink Valley Wash), SW-9 (Sink Valley Wash below proposed mining areas), SW-10 (unnamed tributary to Sink Valley Wash approximately 1.7 miles south of proposed mining areas), SVWOBS-1 (Sink Valley Wash above proposed mining areas, and SVWOBS-2 (Sink Valley Wash east of proposed mining areas).

Lower Robinson Creek drainage

SW-4 (Robinson Creek above proposed mining areas), SW-101 (Lower Robinson Creek near proposed mining areas), BLM-1 (Lower Robinson Creek adjacent to proposed mining areas) and SW-5 (Lower Robinson Creek below proposed mining areas).

Kanab Creek drainage

SW-1 (Kanab Creek near Alton, Utah; above proposed mining areas), SW-3 (Kanab Creek above proposed mining areas), and SW-2 (Kanab Creek below Lower Robinson Creek and below proposed mining areas). Additionally baseline hydrologic data from Lamb Canal, which is an irrigation ditch that conveys water from a diversion in Kanab Creek to irrigated lands adjacent to Kanab Creek west of proposed mining areas, is also collected.

724.300 Geologic Information

Geologic information in sufficient detail to determine the probable hydrologic consequences of mining and determine whether reclamation as required by R645 can be accomplished is given in Chapter 6 of this permit application package and in Appendix 7-1.

724.400 Climatological Information

Climatological information, including temperature and precipitation data, have been routinely measured and recorded at the Alton, Utah weather station (420086) since 1928. The station is located in the town of Alton, approximately two miles north of the proposed Coal Hollow Mine permit area. Climatological data collected at the Alton station for the 77 year period from 1928 to 2005 are summarized in Table 7-3.

Climatological data from the proposed Coal Hollow Mine permit and adjacent area are plotted in Drawing 7-8.

An automated weather station was installed in the proposed Coal Hollow Mine permit area in December 2005. The station is configured to continuously monitor and record temperature, wind velocity, and wind direction data. The station is also configured to continuously measure and record precipitation, although the tipping rain-gauge is not operative during winter months. Climate data from the proposed Coal Hollow Mine and adjacent area are also presented in Appendix 7-6.

724.411 Seasonal precipitation

Precipitation data from the Alton, Utah weather station indicates average annual precipitation of 16.38 inches per year. Doelling (1972) reports average annual precipitation in the Alton Coal Field area ranging from 9 to 20 inches annually with slightly higher increments likely in the higher parts of the plateau (Doelling, 1972). There are generally two annual wet periods in the region. During the wintertime, cyclonic storms bring precipitation (mainly snowfall) to the region. During the summertime, storms originating from convection of air from the Gulf of Mexico or the Pacific Ocean bring rains to the region. Of the two annual wet cycles, the summer rainfall is most reliable. Average monthly precipitation at the Alton station ranges from a low of 0.57 inches in June to a maximum of 1.80 inches in February. Daily temperature and precipitation data recorded at the Coal Hollow Project weather station during 2006 and early 2007 are presented in Appendix 7-6.

The Palmer Hydrologic Drought Index (PHDI; NCDC, 1997) indicates long-term climatic trends for the region. The PHDI is a monthly value generated by the National Climatic Data Center (NCDC) that indicates the severity of a wet or dry spell. The PHDI is computed from climatic and hydrologic parameters such as temperature, precipitation, evapotranspiration, soil water recharge, soil water loss, and runoff. Because the PHDI takes into account parameters that affect the balance between moisture supply and moisture demand, the index is a useful for evaluating the long-term relationship between climate and groundwater recharge and discharge. A plot of the PHDI for Utah Region 4 (which includes the proposed Coal Hollow Mine permit and surrounding area) is shown in Drawing 7-9. It is apparent in Drawing 7-9 that the region has experienced cyclical periods of drought and wetness since 1980. Baseline hydrologic monitoring performed by Utah International, Inc in 1987 and 1988 occurred during a period of near normal wetness. Recent baseline hydrologic monitoring conducted in 2005 and 2006 occurred during a period of moderate to severe wetness, with 2005 being wetter than 2006.

724.412 Wind direction and velocity

Wind data have been collected at the Coal Hollow Project weather station since December 2005. Monthly wind data from the Coal Hollow Project weather station are available from January 2006 through March 2006, and from November 2006 through May 2007. Monthly wind data are plotted as wind rose diagrams, which depict the average direction and velocity of prevailing winds, in Appendix 7-1. Based on recent data from the Coal Hollow Project weather station, it is apparent that the predominant wind direction in the proposed Coal Hollow Mine permit area (during the months for which data are available) are from the northeast, with secondary peaks from the north and south-southwest (Appendix 7-1). Surface winds recorded at the Coal Hollow Project weather station averaged about 6.4 miles per hour. Tabulated hourly wind data from the Coal Hollow Project weather station are maintained on file at Alton Coal Development, LLC.

Wind data have also been collected historically at nearby locations by governmental and other entities. The regionally predominant direction of winds in the region is southwest through west. Secondary peaks are from southeast and northwest. Surface winds in the area average approximately 8 miles per hour. Higher wind speeds are associated with fronts and storms and generally occur during the springtime.

724.413 Seasonal temperature ranges

Temperature data from the region are summarized in Table 7-3. Temperatures in the permit area vary greatly. Temperature data from the Alton station (1928-2005) indicate that monthly average low temperatures are below freezing for the 6-month period from November to April. Monthly average minimum temperatures range from a low of 15.1 °F during January to a high of 49.8 °F in July. Monthly average maximum temperatures range from a low of 39.5 °F in January to a high of 82.6 °F in July. Daily maximum and minimum temperature data collected at the Coal Hollow Project weather station during 2006 and the first quarter of 2007 are presented in Appendix 7-6 and plotted in Drawing 7-8. The maximum temperature recorded during this period was 93.3 °F in July 2006. The minimum temperature recorded during this period was -7.3 °F in January 2007.

724.500 Supplemental Information

Other than the possible short-term diminution in discharge rates from alluvial groundwater systems, including the potential short-term diminution of discharge rates from some springs and seeps in Sink Valley, adverse impacts to the hydrologic balance, either on or off the permit area are not expected to occur. It is not anticipated that acid- and toxic-forming materials will cause significant contamination of groundwater or surface-water supplies. Any discharges of mine waters to surface-water systems will be regulated under and meet the criteria of a UPDES discharge permit. The mining and reclamation plan has been designed to minimize the potential for disturbance or disruption of the hydrologic balance and to protect groundwater and surface-water resources in the area.

If substantial alluvial groundwater inflows into mining areas occur as mining progresses in close proximity to alluvial springs and seeps in the eastern ¼ of Section 30, T39S, R5W and the northwest ¼ of Section 29, T39S, R5W or in close proximity to coarse-grained alluvial sediments in the artesian groundwater system along the eastern side of Sink Valley, Alton Coal Development, LLC will evaluate hydrogeologic conditions at the time such may occur. It should be noted that very large discharges into mine workings are not anticipated based on the results of recent drilling and aquifer testing performed in these areas (see Appendix 7-1). Based on the hydrogeologic conditions encountered, where necessary Alton Coal Development, LLC will use a suitable technique to minimize groundwater inflow rates into the mine, which may include the use of bentonite or natural clay filled cutoff walls or other means where appropriate to protect groundwater resources up-gradient of mining activities. The potential for success of such protective measures in minimizing drainage of alluvial deposits up-gradient of proposed mining areas is believed to be good, given that the thickness of the alluvium in these areas is generally on the order of about 20 to 50 feet and these sediments are directly underlain by essentially impermeable Tropic Shale in proposed mining areas. It is important to note that while temporary impacts to groundwater discharge rates from alluvial springs and seeps could possibly occur, these impacts will likely be short-lived. This conclusion is based on the fact that individual mine pits in most instances will remain open for no more than about 60 to 120 days (measured from the time the mining of the pit is completed to the time the pit is backfilled). The variability in the time individual pits remain open is related to the thickness of overburden at the pit and the state of the overall spoil balance. It should be noted that these times could be somewhat greater if the mining production rate is less than the currently anticipated rate (in the event that contracts for the full 2 million tons of coal per year are not in place). However, the backfilling and rough grading requirements of R645-301.553 will be met (except where a variance to this regulation has been requested to assist with the transition to the adjacent federal coal reserves in the south pits area). After mine pits are backfilled and reclaimed, the potential for appreciable continued drainage of up-gradient alluvial groundwater through the backfilled pits in that area is low. When mining is complete in an area, seasonal recharge to alluvial groundwater systems will gradually replenish groundwater to the alluvial groundwater system. Large-scale dewatering of the alluvial groundwater system, such that appreciable compaction of the aquifer skeleton could occur, is not anticipated (see Appendix 7-1).

If diminution of discharge rates from seeps and springs does occur as a consequence of mining and reclamation activities, any lost water will be replaced according to all applicable Utah State laws and regulations using the water replacement source specified in R645-301-727. The quantity and quality of replacement water detailed in R645-301-727 will be suitable for the existing premining uses and approved postmining land uses.

It should be noted that the proposed Coal Hollow Mine plan calls for the temporary diversion of a reach of the Lower Robinson Creek stream channel approximately 2,000 feet in length in the southeast ¼ of Section 19, T39S, R5W. Details of the proposed diversion are given in Chapter 5, Section 527.220 of this MRP. If this action results in diminution of groundwater or surface-water resources, where required a suitable mitigation for this potential impact will be designed and implemented in consultation with the Division of Oil, Gas and Mining.

If excess groundwater were to be encountered during mining operations such that it could not be adequately managed or discharged in compliance with the Utah UPDES discharge permit (which is considered unlikely), Alton Coal Development, LLC may when necessary and with the approval of the Utah Division of Oil, Gas and Mining construct supplemental containment and settlement ponds in which mine discharge waters may be held for treatment (where necessary) and subsequent discharge through UPDES discharge points in compliance with the UPDES discharge permit.

Mining in the Coal Hollow project area will be a combination of surface mining, either open pit or highwall mining, and underground mining. Both the highwall mining and underground mining are designed such that subsidence is not expected to occur or have a negative impact on renewable resources lands.

724.700 <u>Alluvial Valley Floor Determination</u>

A field investigation has been performed in the proposed Coal Hollow Mine permit and adjacent area to provide to the Division the information required to make an evaluation regarding the existence of a probable alluvial valley floor in the proposed Coal Hollow Mine permit and adjacent area. The results of this field investigation and related information is provided in Appendix 7-1. Additional information regarding potential alluvial valley floors in the area is provided in Appendix 7-7.

A report detailing the findings of a previous field investigation performed by Water Engineering & Technology, Inc., entitled "Geomorphological and sedimentological characteristics of Sink Valley, Kane County, Utah" is included as Appendix 7-4.

725 BASELINE CUMULATIVE IMPACT AREA INFORMATION

Appendix 7-1 contains the results of a comprehensive investigation of groundwater and surface-water systems in the proposed Coal Hollow Mine permit and adjacent area (including the 85.88-acre Dame Lease IBC area). Appendix 7-1 also includes information regarding the probable hydrologic consequences of coal mining in the proposed Coal Hollow Mine permit area and recommendations for hydrologic monitoring. Appendix 7-1 also includes the results of a field investigation performed in the proposed Coal Hollow Mine permit and adjacent area to provide to the Division of Oil, Gas and Mining the information required to make an evaluation regarding the existence of a probable alluvial valley floor in the proposed Coal Hollow Mine permit and adjacent area. This Information together with the information submitted herein can be used to assess the probable cumulative hydrologic impacts of coal mining and reclamation operations in the proposed Coal Hollow Mine permit and adjacent area (including the 85.88-acre Dame Lease IBC area) as required by R645-301-729.

R645-301-726 <u>Modeling</u>

No numerical models have been created for the permit area nor are any planned.

727 ALTERNATIVE WATER SOURCE INFORMATION

This section provides information on the alternative water source that will be used to replace water from groundwaters or surface waters should they be impacted by mining and reclamation activities in the proposed Coal Hollow Mine permit and adjacent area (including the 85.88-acre Dame Lease IBC area).

The alternative water source is a water production well planned for construction on private land leased by Alton Coal Development, LLC in the northwest quarter of Section 29, Township 39 South, Range 5 West. The planned location for the well, which is situated within the proposed Coal Hollow Mine permit area, is shown on Drawing 5-8C. The well will produce water from the alluvial groundwater system in Sink Valley in locations up-gradient of proposed mining operations. Based on aquifer testing performed in the alluvial groundwater system near the proposed water well (using the existing well Y-61 as a pump testing well), it is believed that adequate water can be produced from the new well to satisfy the potential water replacement needs of the mine. Details of the aquifer testing and information on the hydrogeologic characteristics of the Sink Valley alluvial groundwater system are presented in Appendix 7-1.

Water quality data from the Sink Valley alluvial groundwater system near the location of the proposed new water well have been collected from well Y-102 and have been submitted electronically to the Utah Division of Oil, Gas and Mining Utah Coal Mining Water Quality Database (UDOGM, 2007). It is anticipated that the quantity and quality of water produced from the new water production well will be suitable for the existing premining uses and approved postmining land uses.

It should be noted that the proposed water replacement well source will produce water from the coarse-grained alluvial groundwater system in Sink Valley. Nearby springs that could potentially be impacted by mining and reclamation activities are supported by the same alluvial groundwater system. However, while modest decreases in the artesian hydraulic pressures in the alluvial groundwater system could potentially result in diminution of spring flows, the planned new water well will likely be approximately 100 feet deep and will be equipped with an electric well pump giving it the capacity to produce groundwater from the alluvial system even if the hydraulic head in the area were to be diminished such that artesian flow conditions temporarily ceased to exist.

An analysis of the total average discharge of state appropriated groundwaters from the permit and adjacent area has been performed to determine whether the quantity of water that could likely be produced from the new water replacement well will be adequate for potential replacement needs. Based on baseline spring discharge data submitted to the Division (UDOGM, 2007), it is determined that the average discharge of all state appropriated groundwater from groundwater discharge area A (Drawing 7-3, Drawing 7-4) is approximately 35 gpm. The state appropriated waters in groundwater discharge Area A include most of the significant springs in the area and essentially all of the largest springs in the area (Drawing 7-3; Appendix 7-3). The average discharge of all state appropriated groundwater from groundwater discharge area B (Drawing 7-4) is approximately 17 gpm. Using an unlikely worst-case scenario and assuming that all springs with state appropriated waters in both Areas A and B were to cease flowing, a total replacement of approximately 52 gpm would be required. The proposed new water well located in Section 29, Township 39 South, Range 5 West will be designed to produce water at that quantity and, therefore, should be able to provide adequate replacement water in even this worst-case scenario (which is not considered likely). Aquifer analysis described in Appendix 7-1 suggests that the yield of the alluvial groundwater system in which the new water well will be constructed should be capable of sustaining discharges of the required magnitude and for the lengths of time that the need for replacement water would be likely. It should be noted that if the need arises to provide replacement water for impacted state appropriated waters, the duration of the need will likely be of a relatively short duration (see Section 728 below).

Alton Coal Development, LLC has entered into a written agreement with the town of Alton, Utah to transfer the point of diversion for 50 acre-feet of water for use at the Coal Hollow Mine. A copy of this agreement is included in Appendix 7-8 (in confidential binder). This water will be available for all uses at the mine including potential use for water replacement. The planned new water well will be constructed on lands currently leased by Alton Coal Development, LLC. Consequently, no new landowner access agreement will be required for the drilling of the well.

Probable Hydrologic Consequences of Underground Coal Mining at the Alton Coal Development, LLC Coal Hollow Mine

25 November 2014

Alton Coal Development, LLC
Cedar City, Utah

Petersen Hydrologic, LLC
Consultants in Hydrogeology

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INTRODUCTION

The Alton Coal Development, LLC (ACD) Coal Hollow Mine is located approximately 3 miles south of the town of Alton, Utah (Figure 1). A permit to operate the Coal Hollow Mine was issued on 10 November 2010. The first coal was mined in early February 2011.

Alton Coal Development, LLC is currently applying for a permit from the Utah Division of Oil, Gas and Ming to conduct underground coal mining and reclamation activities within the existing Coal Hollow Mine permit area. The purpose of this document is to describe the Probable Hydrologic Consequences (PHC) of the proposed underground mining activities.

The reader is referred to the mining and reclamation plan for the Coal Hollow Mine (C0250005) for supporting information for this document. Detailed information regarding groundwater and surface-water systems in the Coal Hollow Mine permit and adjacent area is provided in Appendix 7-1 (Petersen Hydrologic, 2007) in the Coal Hollow Mine MRP.

Including this introduction, this report includes the following sections:

- Introduction
- Mining Overview
- Climate
- Geology
- Baseline Information
- Probable Hydrologic Consequences Determination
- Recommended Monitoring Plans for Surface Water and Groundwater
- References Cited

MINING OVERVIEW

Prior to 2014, coal mining operations at the Coal Hollow Mine were performed using conventional surface mining (open pit) techniques. Beginning in 2014, ACD began using highwall mining techniques in selected portions of the mine permit area. Using highwall mining techniques, the coal resource can be extracted from an above-ground surface location without causing disturbance of the land surface overlying coal extraction areas. Because of the hydrogeologic characteristics of the bedrock unit present above the coal seam to be mined (the low-permeability Tropic Shale), highwall mining operations have been performed without any detectable disruption of overlying shallow alluvial groundwater systems or impacts to surface water resources (see monitoring information collected by ACD for the highwall mining activities). To date, while limited amounts of groundwater associated with the coal in Smirl Seam has been encountered during highwall mining operations, there has been no discharge of water to the surface from the highwall mining holes (Personal communication, Kirk Nicholes, 2014).

ACD is currently proposing to conduct coal mining operations in portions of the existing Coal Hollow Mine permit area using underground mining techniques. The areas proposed for underground mining operations are shown on Figure 2. The underground mine plan has been designed to incorporate full-support, first mining only. Accordingly, subsidence of the land surface overlying the underground mined areas is not anticipated. The use of underground mining techniques allows for the extraction of the coal resource in areas where the overburden thickness is greater than that in open pit mining areas. Additionally, because there is no associated surface disturbance overlying the mined areas, shallow groundwater systems and surface-water systems overlying mined areas are protected using underground mining techniques.

CLIMATE

Climatological information, including temperature and precipitation data, have been routinely measured and recorded at the Alton, Utah weather station (420086) since 1928. The station is located in the town of Alton, approximately three miles north of the Coal Hollow Mine permit area. Climatological data collected at the Alton station for the 77-year period from 1928 to 2005 have been summarized by the Western Regional Climate Center (2013). The month with the minimum monthly average temperature at the Alton station is January (15.1 °F), while the month with the warmest average maximum temperature is July (82.6 °F). Total precipitation averages 16.40 inches. Precipitation in the Alton area occurs during two annual wet cycles. These include wintertime cyclonic storms which bring precipitation to the area (usually as snowfall), and summertime storms originating from convection in the Gulf of Mexico or the Pacific Ocean (Doelling, 1972). Average monthly precipitation at the Alton station ranges from a low of 0.57 inches in June to a maximum of 1.79 inches in January and February. The average monthly precipitation falling during the month of September is nearly as great, averaging 1.76 inches.

Wind data have been collected at the Coal Hollow Project weather station since December 2005. Wind data from the Coal Hollow Project weather station indicates that the predominant wind directions in the Coal Hollow Mine permit area are from the northeast, with secondary peaks from the north and south-southwest. Surface winds recorded at the Coal Hollow Project weather station averaged about 6.4 miles per hour. Wind data have also been collected historically at nearby locations by governmental and other entities. The regionally predominant direction of winds in the region is southwest through west. Secondary peaks are from southeast and northwest. Surface winds in the regional area average approximately 8 miles per hour. Higher wind speeds are associated with passage of weather fronts and storms and generally occur during the springtime.

GEOLOGY

The geology of the Coal Hollow Mine permit and adjacent area is described in Chapter 6 of the Coal Hollow Mine MRP. Within the proposed underground mining area, Cretaceous Tropic Shale bedrock and Quaternary alluvium is exposed at the land surface. The Cretaceous Dakota Formation is present beneath the Tropic Shale in the proposed underground mining areas within the Coal Hollow Mine permit area. An east-west cross-section through the proposed underground mine workings is presented in Figure 3. These geologic units are described below.

Quaternary Deposits

The Quaternary deposits in the proposed underground mining area consist predominantly of unconsolidated alluvial sediments (interbedded clays, silts, sands, and gravels). The alluvial sediments are derived from erosion of adjacent upland areas located further east. Drilling logs for selected holes drilled near the proposed underground mining areas are included in the Appendix. Within the proposed underground mining and surrounding areas, the alluvial deposits range from a thin veneer to more than 100 feet in thickness. A southeast-northwest hydrologic cross-section through the proposed underground mining area is provided in Drawing 6-12 in the Coal Hollow Mine MRP.

Tropic Shale (Cretaceous)

The Tropic Shale consists predominantly of gray and carbonaceous silty shale with a few marine sandstone beds. (Note that the sandstone beds are not present in the proposed underground mining area as the upper portion of the Tropic Shale in the proposed mining area has been removed by erosion). The Tropic Shale typically weathers at the surface to a clayey soil that typically forms gentle, vegetated slopes. The Tropic Shale is at or near the surface over much of the proposed underground mining area (See Drawings 6-1 and 6-9 in the Coal Hollow Mine MRP). In other areas, the Tropic Shale is covered by varying thicknesses of alluvium. The formation was deposited in an open-marine offshore environment during the maximum westward transgression of the Cretaceous Western Interior Seaway in the Late Cretaceous (Tilton, 2001). Near the top of the formation, more sandy horizons are interbedded with the mudstone units of the formation. These sandy units together with the sandstone at the base of the overlying Straight Cliffs Formation reflect the initial sand influx onto the marine environment of the Tropic Shale. The thickness of the Tropic Shale in the Alton Quadrangle is about 700 feet.

Dakota Formation (Cretaceous)

The Dakota Formation contains the economic coal seams in the Alton Coal Field. The formation consists of fine- to medium-grained sandstone (commonly lenticular) with interbedded gray shale, carbonaceous shale, and coal. In most locations, shaley strata dominate the formation, comprising about 60 to 75 percent of the formation (Doelling, 1972). Where exposed at the surface to the west of the proposed underground mining areas, the unit characteristically forms ledge and slope topography. In the Coal Hollow Project area the Dakota Formation directly overlies the Carmel Formation. The economic coal seams in the

Alton Coal Field are present near the base (Bald Knoll coal zone) and near the top of the formation (Smirl coal zone). Local thinner coal seams that are not of economic importance are present in the center of the formation. The thickness in the western portion of the Alton Coal Field is about 450 feet. In the eastern portion of the Alton Coal Field, the Dakota Formation is about 150 feet thick and rests on the Entrada Sandstone.

Structure

Rock strata in the region dip gently toward the north and east, generally from 1 to 5 degrees. The Alton Coal Field is bounded on the east by the Paunsaugunt Fault and on the west by the Sevier Fault. Regional displacements on these two faults are about 1,000 to 2,000 feet, and 100 to 800 feet, respectively. Additionally, several faults with lesser displacements have been mapped in the region, including the Sand Pass Fault zone (about 400 feet of offset), the Bald Knoll Fault (about 650 feet of offset), and the Sink Valley Fault. The Sink Valley Fault is mapped in the westernmost portions of the proposed underground mining area (Figure 2). The Sink Valley Fault has not been directly intercepted by surface-mining pits at the Coal Hollow Mine. The offset of the Sink Valley Fault in the proposed underground mining location has not been measured. However, drilling evidence suggests that the offset on the Sink Valley Fault in the vicinity is not large (perhaps on the order of 20 feet or less). A prominent geologic feature is the north-south trending ridge of Tropic Shale bedrock that is present in the western portion of the proposed underground mining area. The low-permeability bedrock ridge isolates alluvial groundwater systems east of the ridge with alluvial groundwater systems west of the ridge. Most local faults in the Alton Quadrangle trend in a northerly or north-westerly direction, are several miles long, and are near vertical. A prominent north- to northwest-trending vertical joint set is present in the Upper Cretaceous sandstone rocks in the region. Stratal dips vary appreciably near the fault zones.

BASELINE HYDROLOGIC DATA

Large amounts of baseline hydrologic data have been collected from the Coal Hollow Mine permit and adjacent area. Utah International Inc. (1988) conducted baseline monitoring of springs, streams, and wells in and around the Coal Hollow Mine area as part of previous mine permitting activities. Hydrologic monitoring has also been performed in the Coal Hollow Mine and adjacent areas since 2005 as part of the permitting process for the existing Coal Hollow Mine. Over the more than nine years that Coal Hollow Mine's monitoring has occurred in and adjacent to the mine permit area, a large quantity of surface-water and groundwater quantity and quality data, including field and laboratory water quality data, spring and stream discharge rate data, and groundwater potentiometric data from wells has been collected. These data have been entered into the Utah Division of Oil, Gas and Mining's on-line coal water quality database and are freely accessible at http://linux1.ogm.utah.gov/cgi-bin/appx-ogm.cgi.

Drilling and well completion logs for wells Y-100 and Y-101, together with baseline hydrologic data for wells Y-100 and Y-101 are presented the Appendix.

PROBABLE HYDROLOGIC CONSEQUENCES (PHC) DETERMINATION

This section describes the probable hydrologic consequences of coal mining and reclamation activities associated with the proposed underground mining activities in the existing Coal Hollow Mine permit area. The information presented herein is considered as a supplement to the existing Coal Hollow Mine PHC determination. This determination is based on data presented herein and on information provided elsewhere in the Coal Hollow Mine MRP. This section describes the specific hydrologic consequences associated with the proposed underground mining operations. The mining and reclamation plan has been designed to minimize potential adverse impacts to the hydrologic balance.

Potential adverse impacts to the hydrologic balance

Appreciable adverse impacts to the hydrologic balance, either on or off the permit area are not expected to occur as a result of the proposed underground mining activities at the Coal Hollow Mine.

Using underground mining techniques, the coal reserves proposed for underground mining at the Coal Hollow Mine will be accessed from mine portals in surface-mining pit 10. Using the underground mining techniques, surface disturbance above proposed underground mining areas is not anticipated. The underground mining plan has been designed and engineered to prevent subsidence of the land surface overlying highwall mined areas. Consequently, impacts to overlying shallow alluvial groundwater systems are not anticipated.

Because of the necessity to maintain access to the underground mine portals in pit 10, pit 10 will remain open until the proposed underground mining is compete. This exceeds the typical 60 to 120 day period of time for which most mine pits remain open. Because pit 10 will remain open for an indefinite period of time, there is the potential for ongoing drainage of alluvial groundwater from the adjacent up-gradient alluvial groundwater system situated east of the mine pit. However, only a minimal amount of alluvial groundwater is currently seeping into pit 10 through the exposed alluvial sediments. ACD personnel estimate the total amount of alluvial groundwater currently seeping into pit 10 at about 2 gpm (Personal communication, Kirk Nicholes, 2014). This quantity of ongoing groundwater discharge from the pit 10 highwall is not believed to be of sufficient magnitude relative to the total volume of groundwater in storage in the alluvial groundwater system to cause appreciable impacts to the shallow alluvial groundwater system east of pit 10. As a first order approximation for comparison, alluvial sediments occupying a hypothetical area of that is 0.25 miles long by 0.25 miles wide (1/16 square mile) that is 30 feet thick with an effective porosity of 0.25 could hold about 13.1 million cubic feet (about 98 million gallons) of groundwater in storage. A constant discharge of 2 gpm equates with a discharge of about 1.1 million gallons of water per year. Thus, the 2 gpm discharge of alluvial groundwater into pit 10 represents roughly 1.1 percent of the total volume of water in the hypothetical alluvial groundwater system per year. This volume of groundwater is small relative to the volume in storage and to the volume of annual recharge that likely occurs in the shallow alluvial groundwater system.

The proposed underground mine openings will exist entirely within the Smirl coal seam. Appreciable excavation of the Dakota Formation underlying the Smirl coal seam is not anticipated (and would be undesirable from a mining standpoint). Likewise, the proposed underground mining plan calls for a portion of the Smirl coal seam to be left unmined in the mine roof, and thus disturbance of the overlying Tropic Shale formation should not occur.

If the proposed underground mine workings were to come into hydraulic communication with permeable units of the overlying alluvial groundwater systems, alluvial groundwater could potentially drain into the underground mine openings, depleting the quantity of water present in the overlying alluvial groundwater system. However, where there is the presence of considerable thicknesses of low-permeability Tropic Shale bedrock in the zone extending from the top of the Smirl coal seam to the base of the overlying alluvial groundwater systems, it is considered unlikely that this would occur. The thicknesses of Tropic Shale bedrock that exist in the interburden between the top of the coal seam and the base of the alluvial groundwater system in the vicinity of the proposed underground mining locations at monitoring well Y-101 is more than 170 feet (based on well information for Y-101 and a projected top-of-Smirl-coal-seam elevation at the Y-101 location of about 6752 feet (ACD, 2014)). The potential for any appreciable quantity of alluvial groundwater to migrate through such a zone of Tropic Shale is considered minimal.

It has previously been suggested that groundwater in the Smirl coal seam near wells Y-36 and Y-48 may be in hydraulic communication with the overlying alluvial groundwater system in the vicinity of these wells (UII, 1987; see Figure 4 of Petersen Hydrologic, 2013 for well locations). Although there are uncertainties as to this conclusion, in the event that there is communication between the alluvial groundwater system and the Smirl coal seam, then there would be a potential for alluvial groundwater to enter into underground mine openings in such areas. If there were to be hydraulic communication with the overlying alluvial groundwater system, the volume of water that would be intercepted would likely be proportional to the hydraulic conductivity of the Smirl coal seam. Aquifer testing at Y-36 did not indicate high values of hydraulic conductivity for the interval screened in that well (1×10^{-5} cm/s; UII, 1987).

If any Utah State appropriated water rights are impacted by the proposed underground mining and reclamation operations at the Coal Hollow Mine, these will be replaced according to all applicable Utah State laws and regulations using the designated water replacement source described in Chapter 7 of the Coal Hollow Mine MRP (Section 727).

Monitoring wells and geologic borings

No previous coal mining is known to have occurred within the proposed underground mining areas at the Coal Hollow Mine permit area. However, during several decades prior to the commencement of coal mine permitting activities by Alton Coal Development, LLC in 2005, it is known that several operators performed various permitting activities, conducted coal exploration drilling programs, and performed miscellaneous environmental studies in conjunction with the these permitting activities. In conjunction with these activities, it is known that numerous monitoring wells were drilled and completed, geologic borings were made, and miscellaneous other drilling activities occurred within the Coal Hollow Mine and adjacent areas. If the proposed underground mine workings were to intersect an open borehole or improperly abandoned well, there would be the potential for groundwaters from overlying areas (if saturated permeable zones are present at that location) to flow through the open boreholes into the underground mine workings at appreciable rates. To minimize the potential for this occurrence, where possible identified historic monitoring well and geologic boring locations that penetrated to the Smirl coal seam will be avoided in the proposed underground mining operations.

Presence of acid-forming or toxic-forming materials

Chemical information on the acid- and toxic-forming potential of earth materials naturally present in the existing mine permit area are presented in the Coal Hollow Mine MRP (Appendix 6-2). Chemical information on the low-sulfur Smirl coal seam proposed for mining is presented in the Coal Hollow Mine MRP (Appendix 6-1; confidential binder).

Based on laboratory analytical data, it is apparent that acid-forming and toxic-forming materials that could result in the contamination of surface-water or groundwater supplies in the proposed Coal Hollow Mine permit and adjacent area are generally not present.

Selenium was not detected in any of the samples from the Coal Hollow Mine permit area. Likewise, concentrations of water-extractable boron were also low, being less than 3 mg/kg in all samples analyzed. The pH of groundwaters in and around the Coal Hollow Mine permit area is moderately alkaline (UDOGM, 2013). Data in the Coal Hollow Mine MRP (Appendix 6-2) likewise indicate moderately alkaline conditions in sediments in the existing mine permit area. The solubility of many dissolved trace metals is usually limited in waters with alkaline pH conditions. Consequently, high concentrations of these metal constituents in groundwaters and surface waters with elevated pH levels are not anticipated.

At the conclusion of the underground mining activities at the Coal Hollow Mine, the portals area in Pit 10 will be backfilled and reclaimed. Most of the materials that are handled as part of mining and reclamation activities in the Coal Hollow Mine area are of low hydraulic conductivity (i.e. clays, silts, shales, siltstones, claystones, etc.). Consequently, it has been the experience at the Coal Hollow Mine that groundwater seepage volumes through low-permeability backfill and reclaimed land surfaces in reclaimed mine pit areas and excess spoils storage areas have not been large. Such conditions are anticipated during future operations at the Coal Hollow Mine. Additionally, reclaimed areas will be regraded, sloped, and otherwise managed to minimize the potential for land erosion, to restore approximate surface-water drainage patterns, and also to minimize the potential for ponding of surface waters on reclaimed areas (other than “roughening” or “gouging” of some areas to enhance reclamation). Thus, the potential for interactions between large amounts of disturbed earth materials and groundwaters and surface waters, which could result in leaching of chemical constituents into groundwater and surface-water resources, will be minimized.

Additionally, the mining plan calls for the emplacement of 40 inches of suitable cover material over backfilled areas made up of material types which could appreciably impact vegetation (materials with elevated SAR ratios or other physical or chemical characteristics that could adversely impact vegetation).

The neutralization potential greatly exceeded the acid potential in all samples analyzed, with the neutralization potential commonly exceeding the acid potential by many times, suggesting that acid-mine-drainage will not be (and has not been) a concern at the Coal Hollow Mine. Acid-forming materials in western coal mine environments often consist of sulfide minerals, commonly including pyrite and marcasite, which, when exposed to air and water, are oxidized causing the liberation of H^+ ions (acid) into the water. Oxidation of sulfide minerals may occur in limited amounts in the mine pits where oxygenated water encounters sulfide minerals. However, the acid produced by pyrite oxidation is quickly consumed by dissolution of abundant, naturally occurring carbonate minerals (see Coal Hollow Mine MRP; Appendix 6-2). Dissolved iron is readily precipitated as iron-hydroxide in well-aerated waters, and consequently excess iron is not anticipated (nor is it usually present) in mine discharge water.

Other acid-forming materials or toxic-forming materials have not been identified in significant concentrations nor are such suspected to exist in materials to be disturbed by mining.

Sediment yield from the disturbed area

Potential increases in sediment yield associated with the proposed underground mining activities at the Coal Hollow Mine will be limited to disturbed areas associated with the Pit 10 disturbance (portals location). Because no land subsidence or other surface disturbances are anticipated in areas overlying underground mining areas, increased sediment yield from these areas should not occur. Within the pit 10 portals area as well as along the coal haul roads, erosion from disturbed areas will be minimized through the use of silt fences and other sediment control devices. Surface runoff occurring on disturbed areas will be collected and treated as necessary to remove suspended matter.

Cut ditches will be established on the shoulders of all primary roads to control drainage and erosion. Cut and fill slopes along the primary roads will be minimal and are not expected to cause significant erosion. In locations where there are culvert crossings, the fills slopes will be stabilized by utilizing standard methods such as grass matting or straw wattles. The location and details for roads can be viewed in Chapter 5 of the Coal Hollow Mine MRP (Drawings 5-3 and 5-22 through 5-24).

Through the implementation of these sediment control measures, it is anticipated that sediment yield from disturbed areas in the Coal Hollow Mine permit area will continue to be minimized.

Impacts to important water quality parameters

As discussed above, appreciable quantities of intercepted groundwater are not anticipated in connection with the proposed underground mining operations at the Coal Hollow Mine due primarily to the lack of appreciable groundwater systems in the overlying low-permeability Tropic Shale. Similarly, appreciable quantities of groundwater are not expected to upwell from the Dakota Formation into the proposed underground mine openings. This conclusion is based on the fact that 1) vertical and horizontal groundwater flow in the Dakota Formation is impeded by the presence of low-permeability shales that encase the interbedded lenticular sandstone strata in the formation (i.e., the formation is not a good aquifer), and 2) appreciable natural discharge from the Dakota Formation in the surrounding area to springs or streams is not observed. Similarly, no appreciable inflows of groundwater from the Dakota Formation into the previously mined pits at the Coal Hollow Mine have been observed. Rather, as anticipated, the only appreciable source of groundwater inflow to the mine pit areas has been from saturated near-surface alluvial deposits. These observations support the conclusion that the natural flux of groundwater through the Dakota Formation is meager. The results of aquifer testing performed on wells screened in the Smirl coal seam indicate relatively low values of hydraulic conductivity for the coal seam (see Table 7 of Appendix 7-1 of the Coal Hollow Mine MRP), suggesting that it is unlikely that large inflows of water from the Smirl coal seam into the proposed underground mining areas would occur. Accordingly, because it is considered unlikely that large quantities of groundwater will be intercepted during the proposed underground mining operations (from either the Tropic Shale or the Dakota Formation), it is likely that discharge of large quantities of intercepted groundwater from the mine to receiving waters (such that impacts to important water quality parameters in the receiving waters could occur) will not occur. For these reasons, it is considered unlikely that impacts to important water quality parameters in groundwater and/or surface water resources in the mine area will occur as a result of the proposed underground mining operations at the Coal Hollow Mine.

The water quality of groundwaters in the alluvial groundwater system up-gradient of the proposed underground mining operations will likely not be impacted by mining and reclamation activities in the proposed underground mining areas at the Coal Hollow Mine. In the unlikely event that alluvial groundwaters were to be intercepted by the proposed underground coal mine workings, there would be the potential for increased TDS concentrations if the groundwater were allowed to interact with the marine Tropic Shale.

As groundwater naturally migrates through the shallow, fine-grained alluvial sediments in the Coal Hollow Mine permit and adjacent area (most evident in Sink Valley), the quality of the water is naturally degraded. In the distal portions of Sink Valley, most notably concentrations of magnesium, sulfate, and bicarbonate are elevated in the alluvial groundwater.

The potential for TDS increases associated with interaction of waters with the Tropic Shale can be minimized by avoiding contact where practical between water sources and earth materials containing soluble minerals.

As discussed above, acid mine drainage is not anticipated (nor has it been encountered) at the Coal Hollow Mine permit area. This is due primarily to the relatively low sulfur content of the coal and rock strata in the permit and adjacent area, and to the pervasiveness of carbonate minerals in the soil and rock strata which neutralize the acidity of the water if it occurs. If sulfide mineral oxidation and subsequent acid neutralization via carbonate dissolution were to occur, increases in TDS, calcium, magnesium, sulfate, and bicarbonate concentrations (and possibly also sodium concentrations via ion-exchange with calcium or magnesium on exchangeable clays) would be anticipated.

At any mining operation there is the potential for contamination of soils, surface-water and groundwater resources resulting from the spillage of hydrocarbons. Diesel fuels, oils, greases, and other hydrocarbons products will be stored and used at the mine site for a variety of purposes. A spill Prevention Control and Countermeasure Plan has been implemented at the Coal Hollow Mine that helps to minimize any potential detrimental impacts to the environment.

Spill control kits are provided on all mining equipment and personnel will be trained to properly control spills and dispose of any contaminated soils in an appropriate manner.

While some groundwater will likely be encountered in the proposed Coal Hollow Mine underground workings, appreciable, persistent groundwater inflows are not anticipated. The Tropic Shale formation which directly overlies the Smirl coal seam consists predominantly of soft, silty claystone/shale. The hydraulic conductivity of the Tropic Shale is low. To verify this conclusion, an unweathered sample of the shale obtained from core drilling activities was sent to an analytical laboratory for measurement of hydraulic conductivity. The core sample was remolded and compacted at the laboratory prior to analysis. The measured laboratory hydraulic conductivity was 8.24×10^{-8} cm per second, which indicates a very low potential for the migration of groundwater through the material. The presence of the Tropic Shale in the mine overburden minimizes the potential for vertical recharge of groundwater from overlying potential recharge sources to the coal seam or to underlying geologic formations. Because of the soft, plastic character of the Tropic Shale and the presence of bentonite clay layers throughout the formation, the potential for migration of groundwater through any mining-induced fractures that could potentially form in the overburden is low. The low permeability of the Tropic Shale bedrock also minimizes the potential for groundwater flow through the formation to potential discharge locations (i.e. springs or seeps). This conclusion is supported by the lack of springs or seeps in the Tropic Shale bedrock in the area.

As discussed in Chapters 6 and 7 of the Coal Hollow Mine MRP, the Dakota Formation in the vicinity of the Coal Hollow Mine consists predominantly of shaley strata interbedded with lenticular fine- to medium-grained sandstone and coal. Because of the pervasiveness of interbedded low-permeability horizons in the formation and the vertical and lateral discontinuity of sandstone horizons, the potential for vertical and horizontal movement of groundwater is limited. Although aquifer-quality sandstone strata may exist within the formation, appreciable groundwater migration through the formation over large distances likely does not occur due to the lenticular, discontinuous nature of these permeable sandstones. For this reason, although some modest groundwater inflows into the underground mine workings could potentially occur if saturated sandstone members are encountered in the immediate mine floor, because of the discontinuous nature of these sandstone members, large, sustained inflows of groundwater into the proposed underground mine workings through the Dakota Formation in the mine floor are not anticipated. This conclusion is supported by the fact that little or no groundwater has upwelled from the Dakota Formation into mine pit areas where its upper contact has been exposed by mining at the Coal Hollow Mine.

Similarly, while some minor amounts of groundwater have occasionally been encountered within the Smirl coal seam at the Coal Hollow Mine, large or sustained groundwater inflows through the coal seam have not been encountered. This is likely due because 1) the hydraulic conductivity and porosity of the Smirl coal seam is low, and 2) there is little potential for recharge of the coal seam through the overlying low-permeability Tropic Shale bedrock.

For these reasons, the overall potential for the interception of large amounts of groundwater in the proposed Coal Hollow Mine underground workings is considered low. However, in the event that appreciable water is encountered in the underground workings, Alton Coal Development, LLC will handle and monitor groundwater intercepted in appreciable, sustained quantities in the underground mine workings.

Because the Smirl coal seam dips generally to the east or northeast in the area, the developed mine workings will generally dip in the same direction. As a result, intercepted groundwaters in the underground mine openings will tend to gravity flow away from the mine portals towards deeper, down-dip portions of the mine. Consequently, for these reasons, and because only small amounts of groundwater are expected to be encountered, gravity discharge of groundwaters from the mine portals is not anticipated.

Where possible, groundwater intercepted in the underground mine workings will be managed underground by allowing any groundwater that is encountered to accumulate in underground sumps and/or by utilizing the mine water for in-mine process water. In the unanticipated event that discharge of intercepted mine groundwater to the surface becomes necessary, the mine groundwater will be pumped to Pond 3 for storage and any necessary treatment prior to discharge. Water from Pond 3 may also be used for industrial uses at the mine. Any discharge of the mine water from the pond will be done in accordance with the stipulations of the Coal Hollow Mine's existing UPDES discharge permit.

In the unanticipated event that large, sustained groundwater inflows are encountered within the Coal Hollow Mine underground mine workings (a groundwater inflow greater than 250 gpm that is sustained for at least one month) Alton Coal Development, LLC will commission an investigation of the likely source and water quality characteristics of the groundwater inflow to be performed by a qualified Hydrogeologist. The results of the investigation will be provided to the Division of Oil, Gas and Mining. ACD will also monitor the groundwater inflow rates from such an inflow monthly and report the results of these measurements to the Utah Division of Oil, Gas and Mining on a quarterly basis. The quality of any water discharged to receiving streams from the underground mine workings at the Coal Hollow Mine will be monitored as required by the mine's UPDES permit and reported as required to the Utah Division of Water Quality.

Flooding or streamflow alteration

Appreciable groundwater inflows to the proposed underground mine workings at the Coal Hollow Mine are not anticipated. This conclusion is based on the hydrogeologic characteristics of the Tropic Shale, Dakota Formation, and the Smirl coal seam, and is also based on previous experience at the Coal Hollow Mine (appreciable groundwater inflows from the Tropic Shale, Smirl coal seam, or the Dakota Formation have not been encountered in any of the mine pits or from the highwall mining holes). Consequently, the maximum reasonably foreseeable rates of groundwater discharge from the underground mine workings would likely not be of a magnitude that could potentially cause flooding or streamflow alteration in either the Sink Valley Wash or Lower Robinson Creek drainages.

If excess groundwater were to be encountered during mining operations such that it could not be adequately managed or discharged in compliance with the Utah UPDES discharge permit (which is considered unlikely), Alton Coal Development, LLC may when necessary construct supplemental containment and settlement ponds in which mine discharge waters may be held for treatment (where necessary) and subsequent discharge through UPDES discharge points in compliance with the UPDES discharge permit, minimizing the potential for flooding or streamflow alteration in areas adjacent to mining.

The surface-water drainages adjacent to the Coal Hollow Mine permit area have large discharge capacities (lower Sink Valley Wash, Lower Robinson Creek, and Kanab Creek). These drainages periodically convey very large amounts of precipitation water from intense runoff associated with torrential precipitation events. The anticipated maximum discharge rates from the proposed underground mine workings based on any reasonably foreseeable scenario is much less than that periodically occurring during major torrential precipitation events. While the addition of modest amounts of sediment-free water into these stream channels has the potential to cause minor increases in channel erosion, the magnitude of this potential impact is inconsequential relative to that occurring during torrential precipitation events.

The potential for flooding or streamflow alteration resulting from the proposed underground mine operations at the Coal Hollow Mine permit is considered minimal.

Groundwater and surface water availability

Groundwater use in the Coal Hollow Mine permit and adjacent area is generally limited to stock watering and domestic use in Sink Valley. Some limited use of spring discharge water for irrigation has occurred in Sink Valley, although such irrigation is not occurring presently nor has it occurred in at least the past 10 years.

As discussed previously, there is only a limited potential for the interception of appreciable quantities of groundwater during the proposed underground mining operations at the Coal Hollow Mine. Consequently, the potential for impacts to groundwater and surface-water availability as a result of the proposed underground mining operations is considered low.

Whether mining and reclamation activity will result in contamination, diminution or interruption of State-appropriated waters

As discussed previously, it is considered unlikely that impacts to groundwater or surface-water resources will occur as a result of the proposed underground mining operations at the Coal Hollow Mine. Consequently, the potential for the proposed underground mining activities to result in the contamination, diminution, or interruption of State-appropriated waters is considered low. In the event that any State appropriated waters were to be contaminated, diminished, or interrupted due to mining and reclamation activities in the Coal Hollow Mine permit area, the water will be replaced according to all applicable State laws and regulations using the replacement water source described in Chapter 7 of the Coal Hollow Mine MRP (Section 727).

RECOMMENDED MONITORING PLANS FOR SURFACE WATER AND GROUNDWATER

In order to monitor for potential impacts to surface-water and groundwater resources resulting from the proposed underground mining and reclamation activities at the Coal Hollow Mine, we recommend the continued monitoring of the existing groundwater and surface-water monitoring sites in the vicinity of the proposed underground mining at the sites listed below. The locations of these recommended monitoring sites are shown on Figure 2 and Drawing 7-10 of the Coal Hollow Mine MRP. We also recommend monitoring of two additional alluvial groundwater monitoring wells. These include wells Y-101 and Y-100, which are located adjacent to and up-gradient of the proposed underground mining areas (Figure 2). It is noted that most of these locations are currently included on the Coal Hollow Mine groundwater and surface-water monitoring plan for other reasons. We recommend that the monitoring frequency and monitoring protocols that are listed in Table 7-4 be used for the monitoring associated with proposed underground mining at the Coal Hollow Mine.

GROUNDWATER

Springs

SP-8 (alluvial spring adjacent to underground mining area)

SP-14 (alluvial spring in underground mining area)

SP-16 (alluvial spring adjacent to underground mining area)

SP-20 (alluvial spring adjacent to underground mining area)

Wells

C1-24 (alluvial monitoring well adjacent to underground mining area)

UR-70 (alluvial monitoring well adjacent to underground mining area)

Y-102 (alluvial monitoring well adjacent to underground mining area)

C2-15 (alluvial monitoring well adjacent to underground mining area)

C2-28 (alluvial monitoring well adjacent to underground mining area)

C2-40 (alluvial monitoring well adjacent to underground mining area)

Y-61 (alluvial monitoring well adjacent to underground mining area)

Y-36 (Smirl coal seam monitoring well adjacent to underground mining area)

Y-100 (alluvial monitoring well up-gradient from underground mining area)

Y-101 (alluvial monitoring well within underground mining area)

SURFACE WATER

SW-101 (Lower Robinson Creek below underground mining area)

SW-6 (Sink Valley Wash below underground mining area)

The recommended monitoring plan for groundwater and surface-water monitoring for the proposed underground mining at the Coal Hollow Mine is intended to provide verification that mining-related impacts to groundwater and surface-water systems do not occur, and to determine the magnitude and character of potential impacts if they do occur. Comparisons between monitoring data (for the parameter of interest or concern) collected during baseline pre-mining conditions should be made with monitoring data (for the same parameter or interest of concern) collected during the operational and/or reclamation phase of mining to determine impacts. When changes to monitored parameters subsequent to mining in an area are observed in the monitoring data, an analysis of all data should be performed to determine the cause(s) of the change in the hydrologic condition. In utilizing the monitoring data to detect or quantify potential mining-related impacts, it is necessary to evaluate all factors relevant to the prevailing hydrologic conditions together with the monitoring data. This is because other factors, which are not related to the mining activity, may cause changes in the prevailing hydrologic conditions. In particular, climatic variability (which may result in increased or decreased groundwater and surface-water flow rates, changes in water levels in wells, and changes in water quality) should be carefully evaluated together with the monitoring data. Other factors that may influence coal mine hydrology include grazing practices, land use, and range condition. A convenient and useful means of evaluating regional climatic data is through the use of the Palmer Hydrologic Drought Index, which is a monthly value that indicates the severity of wet and dry spells that is generated by the National Climatic Data Center and available on-line at http://www1.ncdc.noaa.gov/pub/data/cirs/drd964x.phdi.txt.

The use of Stiff (1951) diagrams is a useful technique that is frequently used to analyze and compare groundwater and surface-water quality characteristics from various sources. Information required to create Stiff diagrams is available from the Division of Oil, Gas and Mining Coal Water Quality Database, which is freely accessible at: http://ogm.utah.gov/coal/edi/wqdb.htm. Additional information on coal mining hydrology and potential mining-related impacts, which can be used to assist in the evaluation of monitoring data and potential mining-related impacts is provided on the Utah Division of Oil, Gas and Mining web page at http://ogm.utah.gov/coal/water/default.htm.

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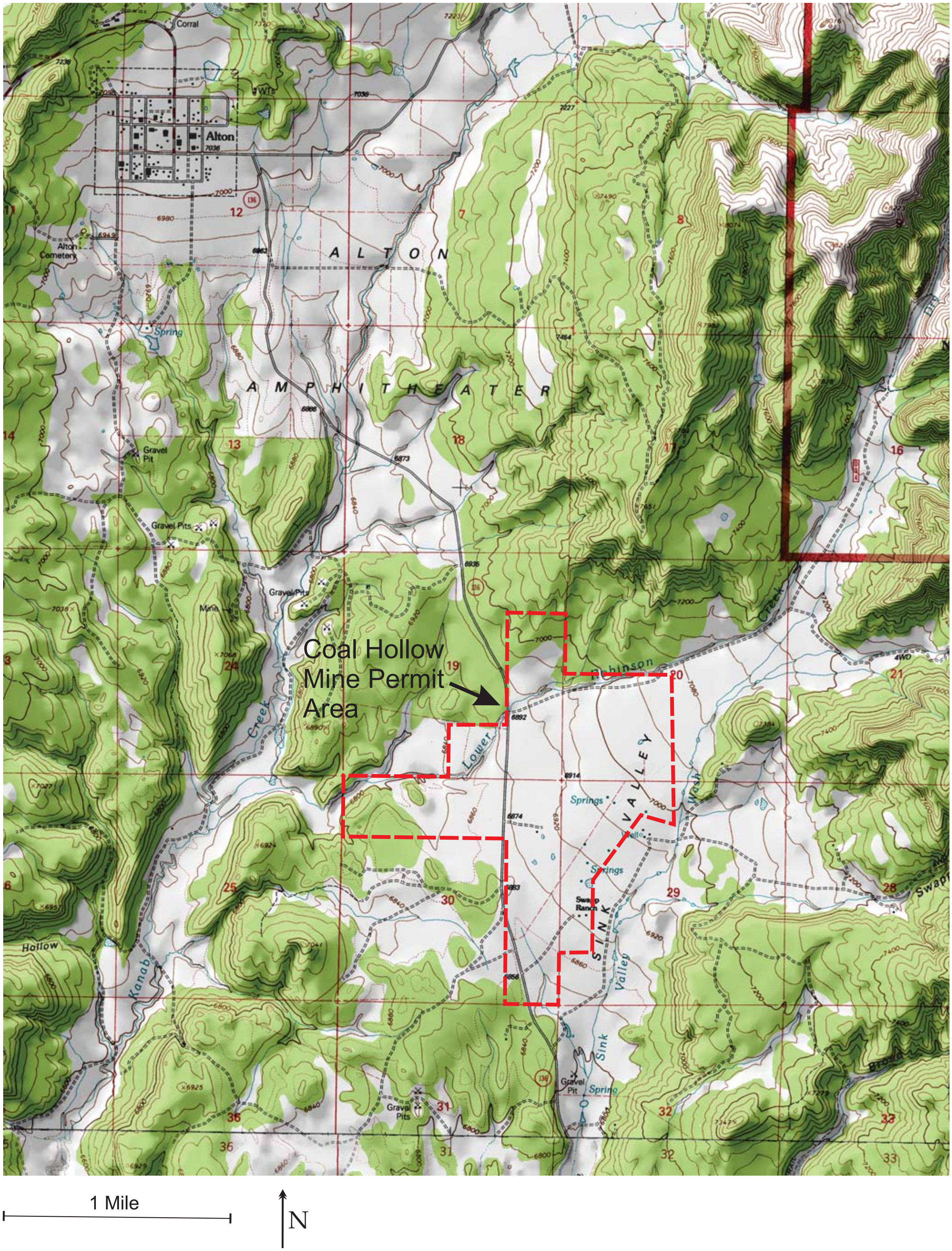

Figure 1 Location of the Coal Hollow Mine permit area.

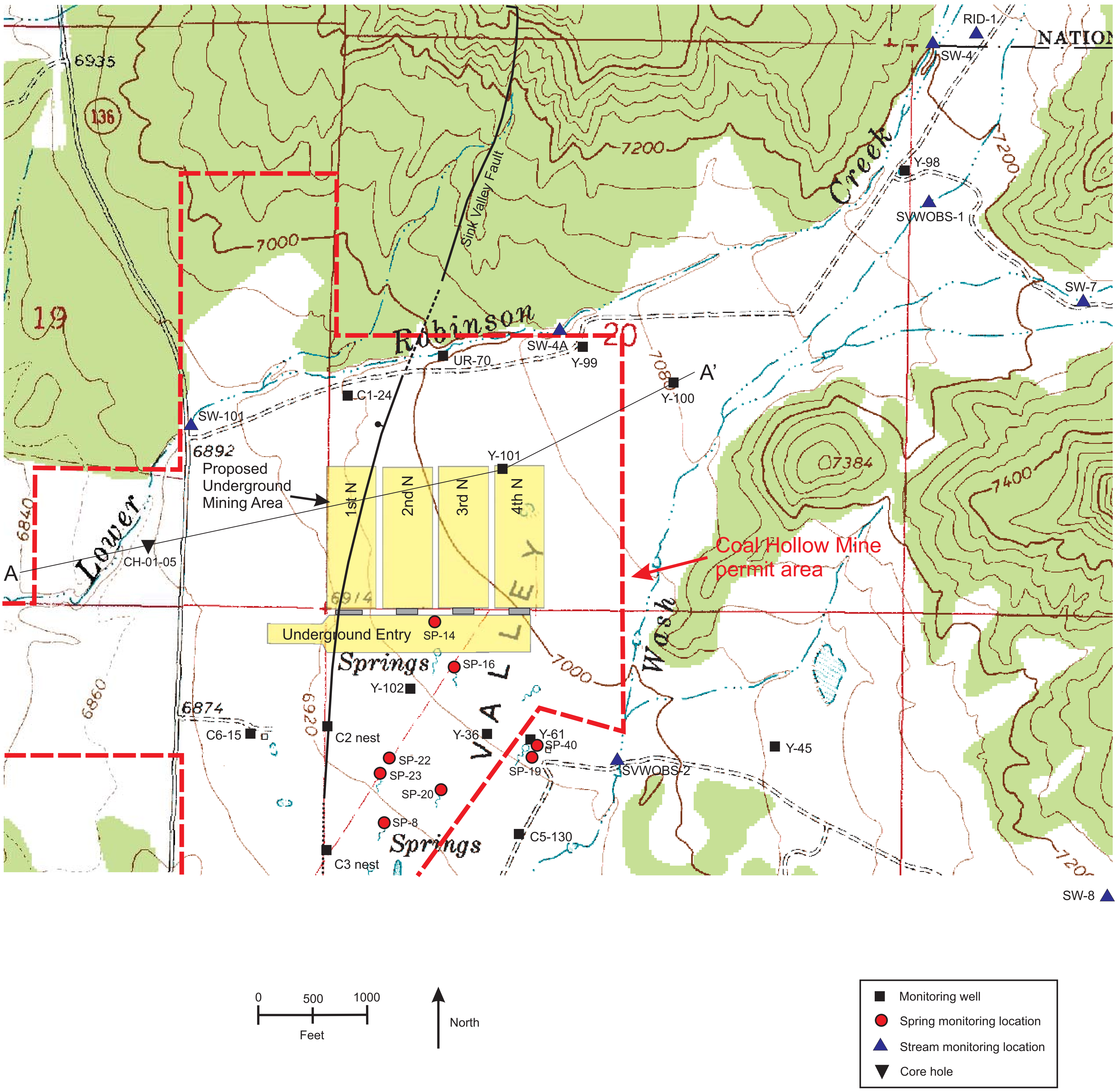

Figure 2 Map showing proposed underground mining areas and selected hydrologic monitoring points. The location for the cross-section A-A' in Figure 3 is also shown.

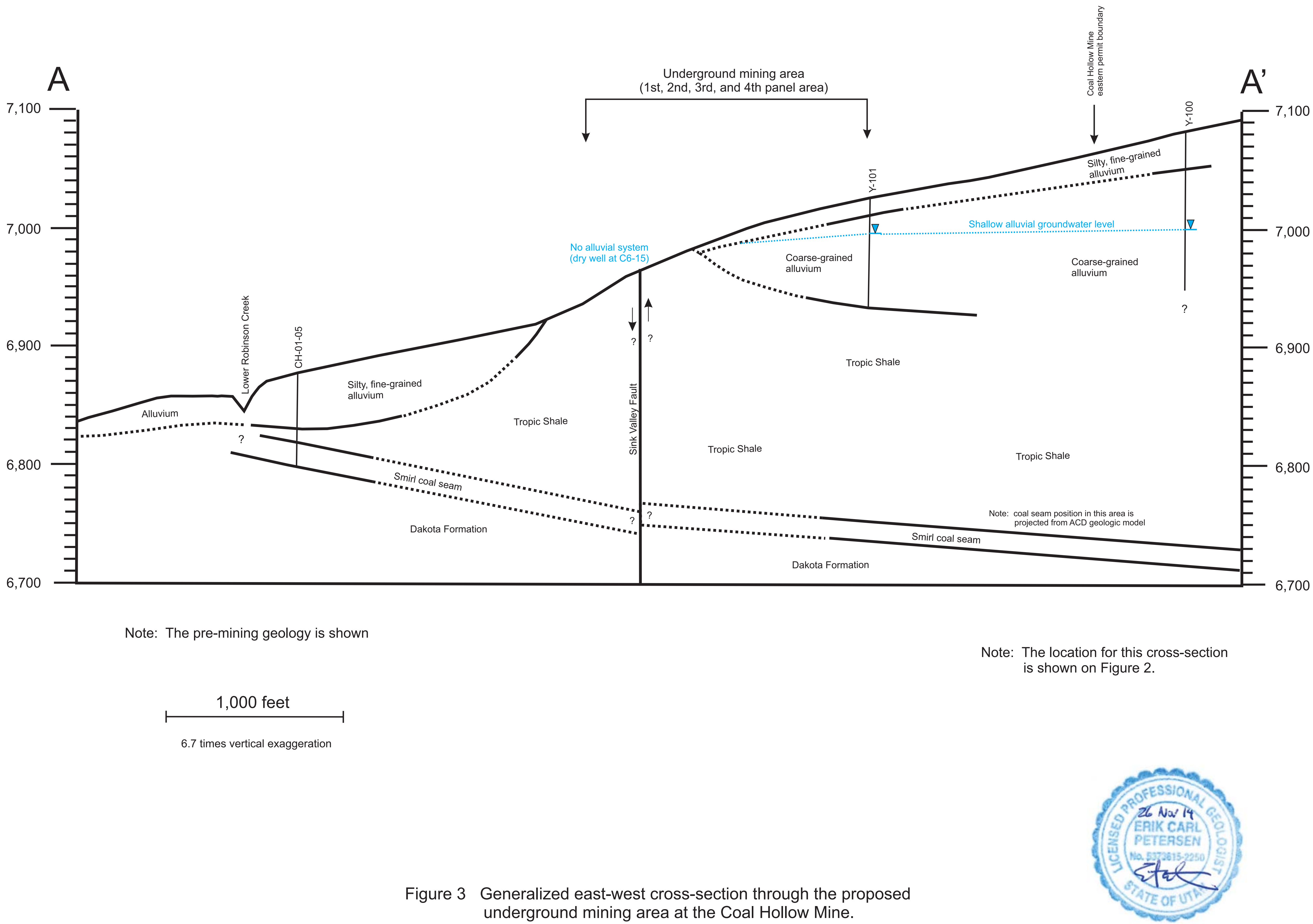

Figure 3 Generalized east-west cross-section through the proposed underground mining area at the Coal Hollow Mine.

Appendix A

Drilling and completion logs and baseline hydrologic data for

selected wells near the proposed underground mining areas at the Coal Hollow Mine

Water level and water quality data for selected wells near the proposed underground mining area at the Coal Hollow Mine.

Site	Date	W.L. (feet below toc)		T	pH	Cond	TDS
Y-98 (A1)	2-Jul-87	---	7094.10	9.5	7.35	1055	---
Y-98 (A1)	4-Aug-87	---	7094.10	7.35	975	10	---
Y-98 (A1)	16-Sep-87	---	7091.75	11.2	7.3	635	346
Y-98 (A1)	27-Oct-87	---	7091.10	11.9	7.2	795	---
Y-98 (A1)	15-Nov-87	---	7091.00	6.1	7.1	920	---
Y-98 (A1)	9-Dec-87	---	7091.33	8.9	7.3	955	548
Y-98 (A1)	5-Jan-88	---	7090.90	7.7	7.5	675	---
Y-98 (A1)	20-Feb-88	---	7090.00	8.1	7.4	610	---
Y-98 (A1)	18-Mar-88	---	7092.30	8.9	7.0	1000	600
Y-98 (A1)	5/27/2005	81.00	7054.50	---	---	---	---
Y-98 (A1)	9/25/2005	71.46	7064.04	---	---	---	---
Y-98 (A1)	11/4/2005	78.89	7056.61	---	---	---	---
Y-98 (A1)	1/25/2006	82.69	7052.81	---	---	---	---
Y-98 (A1)	5/29/2006	81.48	7054.02	---	---	---	---
Y-98 (A1)	9/8/2006	84.67	7050.83	---	---	---	---
Y-98 (A1)	12/21/2006	85.24	7050.26	---	---	---	---
Y-98 (A1)	3/28/2007	84.84	7050.66	---	---	---	---
Y-98 (A1)	6/21/2007	84.79	7050.71	---	---	---	---
Y-98 (A1)	9/29/2007	85.02	7050.48	---	---	---	---
Y-98 (A1)	11/29/2007	85.13	7050.37	---	---	---	---
Y-98 (A1)	6/18/2008	84.71	7050.79	---	---	---	---
Y-98 (A1)	8/20/2008	84.88	7050.62	---	---	---	---
Y-98 (A1)	3/19/2009	85.45	7050.05	---	---	---	---
Y-98 (A1)	5/25/2009	85.08	7050.42	---	---	---	---
Y-98 (A1)	9/29/2009	85.59	7049.91	---	---	---	---
Y-98 (A1)	11/17/2009	85.59	7049.91	---	---	---	---
Y-98 (A1)	4/22/2010	85.70	7049.80	---	---	---	---
Y-98 (A1)	5/13/2010	85.28	7050.22	---	---	---	---
Y-98 (A1)	9/27/2010	84.67	7050.83	---	---	---	---
Y-98 (A1)	12/8/2010	84.69	7050.81	---	---	---	---
Y-98 (A1)	3/27/2011	84.69	7050.81	---	---	---	---
Y-98 (A1)	6/2/2011	79.24	7056.26	---	---	---	---

Site	Date	W.L. (feet below toc)		T	pH	Cond	TDS
Y-98 (A1)	9/8/2011	74.98	7060.52	---	---	---	---
Y-98 (A1)	12/23/2011	84.60	7050.90	---	---	---	---
Y-98 (A1)	3/30/2012	84.21	7051.29	---	---	---	---
Y-98 (A1)	6/22/2012	84.64	7050.86	---	---	---	---
Y-98 (A1)	9/29/2012	85.03	7050.47	---	---	---	---
Y-98 (A1)	12/13/2012	85.32	7050.18	---	---	---	---
Y-98 (A1)	3/14/2013	85.18	7050.32	---	---	---	---
Y-98 (A1)	6/2/2013	85.37	7050.13	---	---	---	---
Y-98 (A1)	9/29/2013	85.84	7049.66	---	---	---	---
Y-98 (A1)	12/19/2013	85.90	7049.60	---	---	---	---
Y-98 (A1)	3/30/2014	85.74	7049.76	---	---	---	---
Y-98 (A1)	6/16/2014	85.64	7049.86	---	---	---	---
Y-99 (A2)	7/2/1987	Dry	<7040.5	---	---	---	---
Y-99 (A2)	8/4/1987	Dry	<7040.5	---	---	---	---
Y-99 (A2)	9/16/1987	Dry	<7040.5	---	---	---	---
Y-99 (A2)	10/27/1987	Dry	<7040.5	---	---	---	---
Y-99 (A2)	11/15/1987	Dry	<7040.5	---	---	---	---
Y-99 (A2)	12/4/1987	Dry	<7040.5	---	---	---	---
Y-99 (A2)	1/5/1988	Dry	<7040.5	---	---	---	---
Y-99 (A2)	2/20/1988	Dry	<7040.5	---	---	---	---
Y-99 (A2)	3/18/1988	Dry	<7040.5	---	---	---	---
Y-99 (A2)	5/25/2005	Dry	<7040.5	---	---	---	---
Y-99 (A2)	5/27/2005	Dry	<7040.5	---	---	---	---
Y-99 (A2)	11/4/2005	Dry	<7040.5	---	---	---	---
Y-99 (A2)	5/29/2006	Dry	<7040.5	---	---	---	---
Y-99 (A2)	9/8/2006	Dry	<7040.5	---	---	---	---
Y-99 (A2)	12/21/2006	Dry	<7040.5	---	---	---	---
Y-99 (A2)	3/28/2007	Dry	<7040.5	---	---	---	---
Y-99 (A2)	6/21/2007	Dry	<7040.5	---	---	---	---
Y-99 (A2)	9/29/2007	Dry	<7040.5	---	---	---	---
Y-99 (A2)	11/29/2007	Dry	<7040.5	---	---	---	---
Y-99 (A2)	3/22/2008	Dry	<7040.5	---	---	---	---
Y-99 (A2)	3/30/2008	Dry	<7040.5	---	---	---	---

Site	Date	W.L. (feet below toc)		T	pH	Cond	TDS
Y-99 (A2)	6/18/2008	Dry	<7040.5	---	---	---	---
Y-99 (A2)	8/20/2008	Dry	<7040.5	---	---	---	---
Y-99 (A2)	12/30/2008	Dry	<7040.5	---	---	---	---
Y-99 (A2)	3/19/2009	Dry	<7040.5	---	---	---	---
Y-99 (A2)	5/25/2009	Dry	<7040.5	---	---	---	---
Y-99 (A2)	9/29/2009	Dry	<7040.5	---	---	---	---
Y-99 (A2)	11/17/2009	Dry	<7040.5	---	---	---	---
Y-99 (A2)	4/22/2010	Dry	<7040.5	---	---	---	---
Y-99 (A2)	5/13/2010	Dry	<7040.5	---	---	---	---
Y-99 (A2)	9/27/2010	Dry	<7040.5	---	---	---	---
Y-100 (A3)	7/2/1987	---	7007.70	10.4	7.15	740	---
Y-100 (A3)	8/4/1987	---	7007.60	9.5	7.35	825	---
Y-100 (A3)	9/16/1987	---	7007.26	9.9	7.00	755	446
Y-100 (A3)	10/27/1987	---	7006.80	9.9	6.9	930	---
Y-100 (A3)	11/15/1987	---	7006.50	7.8	7.3	765	---
Y-100 (A3)	12/9/1987	---	7006.37	8.2	7.10	760	440
Y-100 (A3)	1/5/1988	---	7005.90	8.2	7.2	740	---
Y-100 (A3)	2/20/1988	---	7005.50	8.5	7.5	750	---
Y-100 (A3)	3/18/1988	---	7005.46	8.4	7.00	755	448
Y-100 (A3)	29-Sep-07	82.56	6996.95	---	---	---	---
Y-100 (A3)	18-Jun-08	83.59	6995.92	---	---	---	---
Y-100 (A3)	20-Aug-08	83.69	6995.82	---	---	---	---
Y-100 (A3)	22-Apr-10	88.28	6991.23	---	---	---	---
Y-100 (A3)	8-Sep-11	78.05	7001.46	---	---	---	---
Y-100 (A3)	23-Dec-11	76.90	7002.61	---	---	---	---
Y-100 (A3)	30-Mar-12	78.06	7001.45	---	---	---	---
Y-100 (A3)	13-Dec-12	82.55	6996.96	---	---	---	---
Y-100 (A3)	2-Jun-13	84.02	6995.49	---	---	---	---
Y-100 (A3)	29-Sep-13	86.32	6993.19	---	---	---	---
Y-100 (A3)	19-Dec-13	86.69	6992.82	---	---	---	---
Y-100 (A3)	30-Mar-14	86.56	6992.95	---	---	---	---
Y-100 (A3)	16-Jun-14	86.64	6992.87	---	---	---	---
Y-100 (A3)	29-Sep-14	88.10	6991.41	---	---	---	---

Site	Date	W.L. (feet below toc)		T	pH	Cond	TDS
Y-101 (A4)	2-Jul-87	---	6993.60	10	7.25	965	---
Y-101 (A4)	4-Aug-87	---	6993.30	10	7.25	1045	---
Y-101 (A4)	16-Sep-87	---	6993.06	10.1	7.05	985	594
Y-101 (A4)	27-Oct-87	---	6993.00	10	7	1170	---
Y-101 (A4)	15-Nov-87	---	6993.00	8.4	7.20	980	---
Y-101 (A4)	9-Dec-87	---	6992.94	9.0	7.00	965	582
Y-101 (A4)	5-Jan-88	---	6992.90	8.2	7.10	920	---
Y-101 (A4)	16-Feb-88	---	6992.60	8.5	7.30	910	---
Y-101 (A4)	18-Mar-88	---	6992.63	9.0	7.10	935	598
Y-101 (A4)	23-Dec-11	27.94	6988.85	---	---	---	---
Y-101 (A4)	30-Mar-12	27.33	6989.46	---	---	---	---
Y-101 (A4)	13-Dec-12	29.37	6987.42	---	---	---	---
Y-101 (A4)	2-Jun-13	30.48	6986.31	---	---	---	---
Y-101 (A4)	29-Sep-13	32.01	6984.78	---	---	---	---
Y-101 (A4)	19-Dec-13	32.32	6984.47	---	---	---	---
Y-101 (A4)	30-Mar-14	32.33	6984.46	---	---	---	---
Y-101 (A4)	16-Jun-14	32.85	6983.94	---	---	---	---
Y-101 (A4)	29-Sep-14	33.59	6983.20	---	---	---	---

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BOREHOLE LOG RECORD

Project Alton Coal No. 8448-111 Q.A. No. F6132
By L.L. Osen Date 7/9/86 Page 1 of 2 Rev.
Chkd By Date Page of

Project ID* Hole No.* A 3
Record Type B L R Site No.* Date* Time*
Tnsp Rng Sec 1/4 1/4 1/4
Location N E
SR. EL.* FT M Survey Elevation FT M

Contractor MOTE Driller John Rig Failing 1500
Bit(s) 5-7/8" Tricone Core None Fluid Dry to 27'; Mud
Borehole Diameter(s) Total Depth 131'
Geophysical Log: Yes X No Date: St Fn Status

Depth (ft)	Air Lift (Q)	Symbol	Material Description and Comments
0-5'		SM	Silty fine grained sand, brown, 1% pebble
			gravel, 5% clay
5-10'		SM-ML	Silty fine grained, sand, brown; pebble gravel
			Gravel (2%); sandy silt, reddish brown,
			(10%); clay (5%)
10-15'		CL	Clay, silty, sandy, brown (95%); clay,
			silty (5%); v. little pebble gravel
15-20'		CL	Sand, silty, clayey, brown; v. little pebble
			gravel
20-25'		SM-SC	V. fine grained sand, silty, clayey, brown (50%);
			clayey silt; brown (50%); v. little pebble
			gravel
25-30'		SM-SC	Silty fine grained sand, brown; v. little
			pebble gravel; trace amt of clay;
			trace amount of what appears to be white
			v. fine grained sand
30-35'		GM-GC	Pebble gravel, angular (98%), semi-rounded
			(2%); silty f. grained sand, tan (25%)
35-40'		GM-GC	SAA - Slightly more pebble gravel
40-50'		GM-GC	Sandy silt, tan (50%); pebble gravel
			angular (50%); trace amount of
			organic (carbonaceous) material
50-55'			Silty fine grained sand, tan (50%);
			pebble gravel (50%); trace amount of clay
55-65'		GM-GC	SAA
65-70'		GM-SM	Silty fine grained sand, brown (70%); pebble gravel
			(30%)

* SEE EXPLANATIONS ON BACK

Q.C.

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BOREHOLE LOG RECORD (cont) (A3)

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Depth (ft)	Air Lift (Q)	Symbol	Material Description and Comments
70-75'		GM-SM	SAA
75-120'		GM-SM	SAA; Trace clay
120-131'		GM-SM	SAA; approximately 5% more silty sand

* SEE EXPLANATIONS ON BACK

Q.C.

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BOREHOLE LOG RECORD

Project Alton Coal No. 8448-111 Q.A. No. F6132
By L.L. Osen Date 7/11/86 Page 1 of 2 Rev.
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Project ID* Hole No.* A 4
Record Type B L R Site No.* Date* Time*
Tnsp Rng Sec 1/4 1/4 1/4
Location N E
SR. EL.* FT M Survey Elevation FT M

Contractor MOTE Driller John Rig Failing 1500
Bit(s) 5-7/8" Tricone Core None Fluid Dry to 15' Revert @15'
Borehole Diameter(s) Total Depth
Geophysical Log: Yes No Date: St Fn Status

Depth (ft)	Air Lift (Q)	Symbol	Material Description and Comments
0-5'		SM	Silty sand, brown, fine grained, slightly
			cohesive, dry
5-10'		SM	SAA, slightly more cohesive
10-15'		SM-SC	SAA, hit gravel at 14', trace clay
			Started drilling with mud
15-20'		GM-GC	Pebble gravel, large pebbles angular, probably due
			to breakage; some smaller pebbles are rounded to
			subangular; 1.5% silty sand, 0.5% silty clay
20-25'		GM-GC	Pebble gravel, SAA, 3% clay, 2% silt
25-30'		GM-GC	Pebble gravel, SAA, 5% brown silty fine-grained
			sand, 5% clay
30-35'		GM-GC	Pebble gravel, SAA, 10% brown sandy, clayey silt
35-40'		GM-GC	Pebble gravel, SAA, 5% brown silty sand with very
			little clay
40-45'		GM-GC	Pebble gravel, SAA, 3% brown, very fine grained
			sandy silty clay, 2% brown sandy silt
45-50'		CH	Clay, grayish brown, silty, 5% pebble gravel.
			Driller noted clay layer @ 43-49' (looks like
			Tropic Shale slopewash)
@ 49'			Started losing water
50-55'		GM-GC	Pebble gravel, 2% brown clayey silty sand
55-60'		GM-GC	Pebble gravel, 1% brown clayey silty sand, 1% brown
			silty sandy clay

* SEE EXPLANATIONS ON BACK

Q.C.

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BOREHOLE LOG RECORD (cont) (A4)

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Depth (ft)	Air Lift (Q)	Symbol	Material Description and Comments
60-65'		GM-GC	Pebble gravel, 5% brown sandy clayey silt
65-70'		GM-GC	Pebble gravel, 5% silty, clayey fine-grained sand
70-75'			SAA
75-80'		GM-GC	Pebble gravel, 3% brown silty sand, 2% brown silty
			clay - looks like Tropic Shale
80-84'		GM-GC	50% pebble gravel; 50% gray silty clay (Tropic
		CL	Shale)

* SEE EXPLANATIONS ON BACK

Q.C.

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environmental engineers, scientists, planners & management consultants

BOREHOLE LOG RECORD

Project: Alton Coal
No.: 8448-111
By: L.L. Osen
Date: 7/11/86
Page 1 of 1
Chkd By:
Date:

Q.A. No. F6132
Rev.:
Page ____ of ____

Project ID*:
Hole No.*: A 2
Record Type: B L R
Site No.*:
Date*:
Time*:
Tnsp:
Rng:
Sec:
1/4:
1/4:
1/4:
Location N:
E:
SR. EL.*: FT / M
Survey Elevation: FT / M

Contractor: MOTE
Driller: John
Rig: Failing 1500
Bit(s): 5-7/8" Tricone
Core: None
Fluid: None
Borehole Diameter(s):
Total Depth: 22'
Geophysical Log: Yes ___ No X
Date: St 7/9 Fn 7/9
Status:

Depth (ft)	Air Lift (Q)	Symbol	Material Description and Comments
0-10'		SM-SC	Silty fine grained sand, brown, weathered, dry
			(60%); pebble gravel, angular to sub-rounded;
			matrix is slightly moist, cohesive
10-15'		SM-SC	Silty fine grained sand, brown (95%), pebble gravel
			angular to sub-rounded; trace sandy, clayey silt
			chunks, dry.
15-20'		SM-SC	Silty fine grained sand, brown (50%); clay, hard
			grayish brown, (50%), dry.
20-22'		CL	Silty claystone, grayish brown, Tropic Shale,
			dry.

* SEE EXPLANATIONS ON BACK

Q.C.

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WELL CONSTRUCTION SUMMARY

Project UI - Alton Coal No. 8448-111 Q.A. No. F6216

By L.L. Osen Date 7/9/86 Page 1 of 1 Rev.

Chkd By Date Page of

Project ID* Well No.* A 1

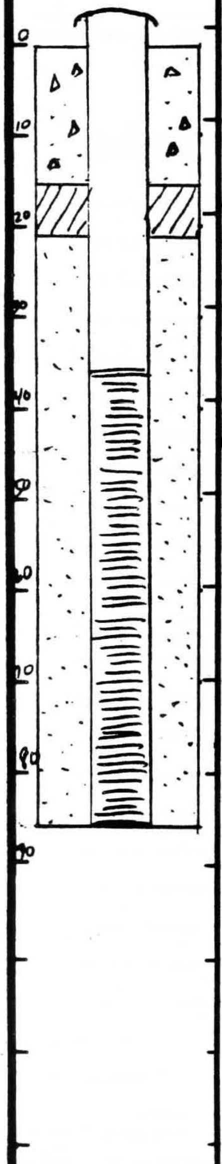
Record Type W C S Site No.* Date* Time*

Tnsp Rng Sec 1/4 1/4 1/4

Location N E

SR. EL.* FT M Survey Elevation . FT M

PERSONNEL L.L. Osen/Dave Tabet DEU TOP OF CASING ELEVATION



DRILLING SUMMARY

Total Depth 86'

Borehole Diameter From 0 to 86'
5-7/8"

Driller John Grubelnik of MO-TE

Rig Failing 1500

Bit(s) Tricone

Drilling Fluids From 0 to 86'
Mud (Revert)

Surface Casing From to

CONSTRUCTION TIME LOG

Task	Start Date	Start Time	Finish Date	Finish Time
Drilling 0-40'	7/8			1700
40-86'	7/9	0800	7/9	
Geophysical Logging	7/9		7/9	
Casing	7/9		7/9	
Filter Placement	7/9		7/9	
Cementing	7/9		7/9	
Development	7/19	1230	7/19	1300
Other Devel-opment	7/19	1755	7/19	1935

WELL DESIGN

Basis: Geologic Log X

Geophysical Log

Casing String(s): C-Casing S-Screen

+2.99-36.63' C1 36.63-86.0' S1

CONSTRUCTION DESCRIPTION

Casing: C1 2" SCH 80 PVC

C2

C3

C4

Screen: S1 2" SCH 80 PVC

S2

S3

S4

Centralizers N/A

Filter Material Silica Sand (10-20) 21'-86' (10-100# bags)

Cement 0-15.5' (2.5-96 lb sacks/5 Gal. H_2O)

Slot Sizes .010 Slot

Other 15.5'-21' - Bentonite Pellet Seal (1-5 Gal. Bucket)

* SEE EXPLANATIONS ON BACK Q.C.

WELL CONSTRUCTION SUMMARY

WELL DEVELOPMENT

7/9/86 -- As much mud (revert) as possible was flushed out of the hole.
7/19/86 -- (see development notes)
-- 1230-1300 -- Tried using air compressor. Looks like we only blew air through screen.
-- 1755-1925 -- Bailed well -removed 15 gal - Bailed to EC & pH stability

COMMENTS Another drill hole 20' from this hole -- 0-42' -- Filled with cuttings & cement. Water level dropped significantly after using air compressor on well (see notes).

WELL CONSTRUCTION ACCOUNTING SUMMARY

ITEM	SIZE	QNTY	UNIT	BID COST	TOTAL COST	REMARKS
Borehole Drilling						
Casing (blank)						
Casing (slotted)						
Casing Install.						
Filter Pack						
Filter Install.						
Bentonite Pellets						
Pellet Install.						
Grout						
Grout Install.						
Borehole Plug						
Plug Install.						
Protect. Casing						
Casing Install.						
Well Development						
Site Clean-up						
Aux. Air						
Back-hoe						
Standby (spec.)						

PROJECT ID – Two Letter Designation
WELL NO. – Four Character Alphanumeric Designation
SITE NO. – Four Character Alphanumeric Designation

DATE – Yr, Yr, Mo, Mo, Day, Day
TIME – Military
SR. EL. – Surface Elevation

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WELL CONSTRUCTION SUMMARY

Project UI - Alton Coal No. 8448-111 Q.A. No. F6216

By L.L. Osen Date 7/30/86 Page 1 of 1 Rev.

Chkd By Date Page of

Project ID* Well No.* A 5

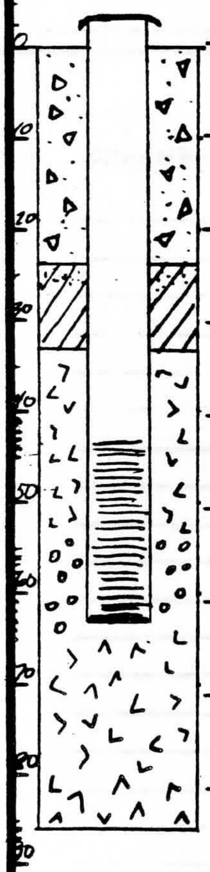
Record Type W C S Site No.* Date* Time*

Tnsp Rng Sec 1/4 1/4 1/4

Location N E

SR. EL.* FT M Survey Elevation . FT M

PERSONNEL L. Osen/G. Shaughnessy TOP OF CASING ELEVATION



DRILLING SUMMARY

Total Depth 86'

Borehole Diameter From 0 to 86' = 5-7/8"

Driller John Grubelnik from MO-TE

Rig Failing 1500

Bit(s) 5-7/8" Tricone

Drilling Fluids From 0 to 86'

6 bags barite/4 bags revert

Surface Casing From to

CONSTRUCTION TIME LOG

Task	Start Date	Start Time	Finish Date	Finish Time
Drilling	7/11		7/11	
Geophysical Logging	7/11		7/11	
Casing	7/11		7/11	
Filter Placement	7/11		7/11	
Cementing	7/11		7/11	
* Development	7/11		7/12	
Other				

WELL DESIGN

Basis: Geologic Log X

Geophysical Log X

Casing String(s): C-Casing S-Screen

+2.8'-43.7'	C1	43.7 -62.94 S1

CONSTRUCTION DESCRIPTION

Casing: C1 2" SCH 80 PVC

C2

C3

C4

Screen: S1 2" SCH 30 PBC

S2

S3

S4

Centralizers N/A

Filter Material Pea gravel/material caving in hole 32'-62.9'

Cement Barite mix - 0-24'. 10 - 96# sacks cement; 3 - 100# bags Barite; 35 Gal H_2O

Slot Sizes .010 Slotted

Other Hole bridged at 62.9' -- Ran casing down to bridge; *Hole bridged solid at 32' Bentonite pellet seal 24'-32'

* SEE EXPLANATIONS ON BACK

Q.C.

WELL CONSTRUCTION SUMMARY

WELL DEVELOPMENT The well was self-developing. The well was left uncapped and flowed overnight at a rate of approximately 10-15 GPM after initially flowing at 15-20 GPM when well installed; water is clear.

COMMENTS Managed to get pea gravel tagged to 56' -- with 8 more gallons of pea gravel, the materials in hole were tagged at 32' -- The hole bridged again -- a solid bridge on all sides of the well casing -- Bentonite seal put on top of bridge.

WELL CONSTRUCTION ACCOUNTING SUMMARY

ITEM	SIZE	QNTY	UNIT	BID COST	TOTAL COST	REMARKS
Borehole Drilling						
Casing (blank)						
Casing (slotted)						
Casing Install.						
Filter Pack						
Filter Install.						
Bentonite Pellets						
Pellet Install.						
Grout						
Grout Install.						
Borehole Plug						
Plug Install.						
Protect. Casing						
Casing Install.						
Well Development						
Site Clean-up						
Aux. Air						
Back-hoe						
Standby (spec.)						

PROJECT ID - Two Letter Designation
WELL NO. - Four Character Alphanumeric Designation
SITE NO. - Four Character Alphanumeric Designation

DATE - Yr, Yr, Mo, Mo, Day, Day
TIME - Military
SR. EL. - Surface Elevation

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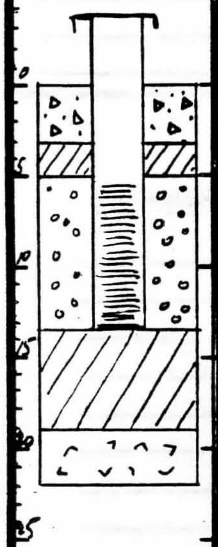
WELL CONSTRUCTION SUMMARY

Project UI - Alton Coal No. 3448-111 Q.A. No. F6216
By LLO Date 7/9/86 Page 1 of 1 Rev.
Chkd By Date Page of

Project ID* Well No.* A 2
Record Type W C S Site No.* Date* Time*
Tnsp Rng Sec 1/4 1/4 1/4
Location N E
SR. EL.* FT M Survey Elevation . FT M



PERSONNEL L L Osen TOP OF CASING ELEVATION

DRILLING SUMMARY

Total Depth 22'
Borehole Diameter From 0 to 22' = 5-7/8"
Driller John Grubelnik
Rig Failing 1500
Bit(s) 5-7/8" Tricone
Drilling Fluids From to
None - Drilled dry
Surface Casing From to

WELL DESIGN

Basis: Geologic Log X
Geophysical Log
Casing String(s): C-Casing S-Screen

+3.81	5.09	C1	5.09	13.2	S1

CONSTRUCTION TIME LOG

Task	Start Date	Start Time	Finish Date	Finish Time
Drilling	7/9		7/9	
Geophysical Logging N/A				
Casing	7/9		7/9	
Filter Placement	7/9		7/9	
Cementing	7/9		7/9	
Development				
Other Dry - see Comments	7/19		7/19	

CONSTRUCTION DESCRIPTION

Casing: C1 2" Sch 80 PVC
C2
C3
C4
Screen: S1 2" Sch 80 PVC
S2
S3
S4
Centralizers N/A
Filter Material 5'-13.2' - Pea Gravel (40 gals)
Cement 0-3'; ¼ - 96 lb sack 2.5 Gal. H_2O
Slot Sizes .010 Slot
Other Bentonite seal #1 13.2'-19' (5 gal pellet
Bentonite seal #2 3'-5' (1.6 g pellet
Cuttings - 19'-22' (sloughed material from sides of borehole.)

* SEE EXPLANATIONS ON BACK Q.C.

WELL CONSTRUCTION SUMMARY

WELL DEVELOPMENT 7/19/86 - Well had residual water -- 0.63' of screened section was unslotted therefore water in well should only be that that was poured on top of Bentonite for wetting the Bentonite pellets.

COMMENTS

WELL CONSTRUCTION ACCOUNTING SUMMARY

ITEM	SIZE	QNTY	UNIT	BID COST	TOTAL COST	REMARKS
Borehole Drilling						
Casing (blank)						
Casing (slotted)						
Casing Install.						
Filter Pack						
Filter Install.						
Bentonite Pellets						
Pellet Install.						
Grout						
Grout Install.						
Borehole Plug						
Plug Install.						
Protect. Casing						
Casing Install.						
Well Development						
Site Clean-up						
Aux. Air						
Back-hoe						
Standby (spec.)						

PROJECT ID - Two Letter Designation
WELL NO. - Four Character Alphanumeric Designation
SITE NO. - Four Character Alphanumeric Designation

DATE - Yr, Yr, Mo, Mo, Day, Day
TIME - Military
SR. EL. - Surface Elevation

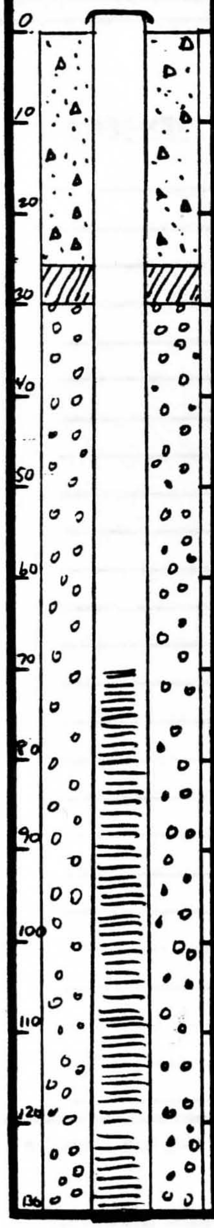
CDM
environmental engineers, scientists, planners, & management consultants

WELL CONSTRUCTION SUMMARY

Project UI - Alton Coal No. 8448-111 Q.A. No. F6216
By L.L. Osen Date 7/10/86 Page 1 of 1 Rev.
Chkd By Date Page of

Project ID* Well No.* A 3
Record Type W C S Site No.* Date* Time*
Tnsp Rng Sec 1/4 1/4 1/4
Location N E
SR. EL.* FT/M Survey Elevation . FT/M

PERSONNEL L.L. Osen TOP OF CASING ELEVATION



DRILLING SUMMARY

Total Depth 131'
Borehole Diameter From 0 to 131' = 5-7/8"
Driller John Grubelnik from MO-TE
Rig Failing 1500
Bit(s) 5-7/8" Tricone
Drilling Fluids From 0 to 131' Johnson Revert (3 bags)
Surface Casing From to

WELL DESIGN

Basis: Geologic Log X
Geophysical Log
Casing String(s): C-Casing S-Screen

+2.5 - 70.10 C1 | 70.10 - 130.59 S1

CONSTRUCTION TIME LOG

Task	Start Date	Start Time	Finish Date	Finish Time
Drilling	7/10	1115	7/10	
Geophysical Logging	7/10		7/10	
Casing	7/10		7/10	
Filter Placement	7/10		7/10	
Cementing	7/10		7/10	1710
Development	7/19	1040	7/19	1210
Other				

CONSTRUCTION DESCRIPTION

Casing: C1 2" SCH 80 PVC
C2
C3
C4
Screen: S1 2" SCH 80 PVC
S2
S3
S4
Centralizers N/A

Filter Material Pea Gravel 29.5'-131' (102.5 Gal.)
Cement 0-26' - 3-96# Sacks 15 Gal. H_2O
Slot Sizes .010 Slotted
Other Bentonite seal - 26-29.5' (3 Gal. of Pellets + 5 Gal. H_2O to wet)

* SEE EXPLANATIONS ON BACK

Q.C.

WELL CONSTRUCTION SUMMARY

WELL DEVELOPMENT Used an air compressor to blow water out of the well at a rate of 1-2 GPM for 35 minutes (see well development notes). Was still some v. fine sand coming out of hole; pH and EC had stabilized; water level before & after development ~ the same.

COMMENTS While doing the well completion, the drillers flushed out as much revert as possible. At the end of drilling, the mud (revert) was fairly watered down anyway. Due to limit on number of bags available for the hole.

WELL CONSTRUCTION ACCOUNTING SUMMARY

ITEM	SIZE	QNTY	UNIT	BID COST	TOTAL COST	REMARKS
Borehole Drilling						
Casing (blank)						
Casing (slotted)						
Casing Install.						
Filter Pack						
Filter Install.						
Bentonite Pellets						
Pellet Install.						
Grout						
Grout Install.						
Borehole Plug						
Plug Install.						
Protect. Casing						
Casing Install.						
Well Development						
Site Clean-up						
Aux. Air						
Back-hoe						
Standby (spec.)						

PROJECT ID - Two Letter Designation
WELL NO. - Four Character Alphanumeric Designation
SITE NO. - Four Character Alphanumeric Designation

DATE - Yr, Yr, Mo, Mo, Day, Day
TIME - Military
SR. EL. - Surface Elevation

WELL CONSTRUCTION SUMMARY

WELL DEVELOPMENT 7/19/86 -- See well development notes; let air compressor run for 55 minutes -- blowing water out of the casing at a rate of 2-5 GPM (varied over time) -- The well was extremely well developed.

COMMENTS ______

WELL CONSTRUCTION ACCOUNTING SUMMARY

ITEM	SIZE	QNTY	UNIT	BID COST	TOTAL COST	REMARKS
Borehole Drilling						
Casing (blank)						
Casing (slotted)						
Casing Install.						
Filter Pack						
Filter Install.						
Bentonite Pellets						
Pellet Install.						
Grout						
Grout Install.						
Borehole Plug						
Plug Install.						
Protect. Casing						
Casing Install.						
Well Development						
Site Clean-up						
Aux. Air						
Back-hoe						
Standby (spec.)						

PROJECT ID - Two Letter Designation
WELL NO. - Four Character Alphanumeric Designation
SITE NO. - Four Character Alphanumeric Designation

DATE - Yr, Yr, Mo, Mo, Day, Day
TIME - Military
SR. EL. - Surface Elevation

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WELL CONSTRUCTION SUMMARY

Project UI - Alton Coal No. 8448-111 Q.A. No. F6216

By L.L. Osen Date 7/11/86 Page 1 of 1 Rev.

Chkd By Date Page of

Project ID* Well No.* A 4

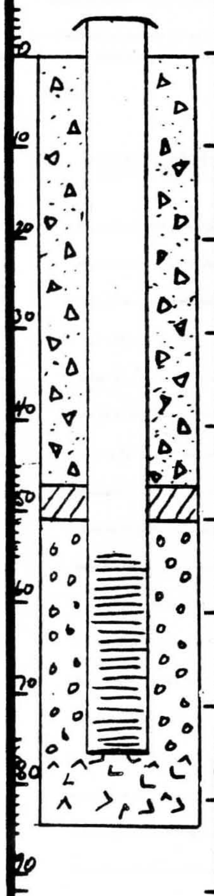
Record Type W C S Site No.* Date* Time*

Tnsp Rng Sec 1/4 1/4 1/4

Location N E

SR. EL.* FT/M Survey Elevation . FT/M

PERSONNEL L.L. Osen TOP OF CASING ELEVATION



DRILLING SUMMARY

Total Depth 84'

Borehole Diameter From 0 to 84'
= 5-7/8"

Driller John Grubelnik
From MO-TE

Rig Failing 1500

Bit(s) 5-7/8" Tricone

Drilling Fluids From 15' to 84'
Revert

Surface Casing From to

CONSTRUCTION TIME LOG

Task	Start Date	Start Time	Finish Date	Finish Time
Drilling	7/11		7/11	
Geophysical Logging	7/11		7/11	
Casing	7/11		7/11	
Filter Placement	7/11		7/11	
Cementing	7/11		7/11	
Development	7/19		7/19	
Other				

WELL DESIGN

Basis: Geologic Log X
Geophysical Log

Casing String(s): C-Casing S-Screen

+3.46-54.49' C1 | 54.49-76.64' S1

CONSTRUCTION DESCRIPTION

Casing: C1 2" SCH 80 PVC
C2
C3
C4

Screen: S1 2" SCH 80 PVC
S2
S3
S4

Centralizers N/A

Filter Material Pea Gravel 50.6'-77.6'

Cement 0-47'

Slot Sizes .010 Slotted

Other Bridge formed at 77.6'--
Could not get past with pipe --
Bentonite Pellet Seal 47-50.6'

✱ SEE EXPLANATIONS ON BACK

Q.C.

WELL CONSTRUCTION SUMMARY

WELL DEVELOPMENT 7/19/86 -- See well development notes; let air compressor run for 55 minutes -- blowing water out of the casing at a rate of 2-5 GPM (varied over time) -- The well was extremely well developed.

COMMENTS

WELL CONSTRUCTION ACCOUNTING SUMMARY

ITEM	SIZE	QNTY	UNIT	BID COST	TOTAL COST	REMARKS
Borehole Drilling						
Casing (blank)						
Casing (slotted)						
Casing Install.						
Filter Pack						
Filter Install.						
Bentonite Pellets						
Pellet Install.						
Grout						
Grout Install.						
Borehole Plug						
Plug Install.						
Protect. Casing						
Casing Install.						
Well Development						
Site Clean-up						
Aux. Air						
Back-hoe						
Standby (spec.)						

PROJECT ID – Two Letter Designation
WELL NO. – Four Character Alphanumeric Designation
SITE NO. – Four Character Alphanumeric Designation

DATE – Yr, Yr, Mo, Mo, Day, Day
TIME – Military
SR. EL. – Surface Elevation

CDM

environmental engineers, scientists, planners, & management consultants

BOREHOLE LOG RECORD

Project UI - Alton Coal No. 8448-111 Q.A. No. F6132

By L.L. Osen-JGS Date 7/12/86 Page 1 of 2 Rev.

Chkd By Date Page of

Project ID* Hole No.* A 5

Record Type B L R Site No.* Date* Time*

Tnsp Rng Sec 1/4 1/4 1/4

Location N E

SR. EL.* FT M Survey Elevation FT M

Contractor MOTE Driller John Rig Failing 1500

Bit(s) 5-7/8" Tricone Core Fluid Revert/Barite @ 0' @ 42'

Borehole Diameter(s) Total Depth

Geophysical Log: Yes No Date: St 7/11 Fn Status

Depth (ft)	Air Lift (Q)	Symbol	Material Description and Comments
		7/12/86	Arrived on site @ 0815, had already drilled
			from 42' - 77'
0'-5'	...	CL-ML	Clay, brown to gray trace of black, silty with
			minor sand sub rnded gravel to 1/8"
5'-10'		SC-CL	Sand, light gray, very fine to fine, with some clay
			alternating with clay, tan, silty, minor coarse
			sand & trace of ang. clinker gravel to 1/8"
10-15'		CL-SP	Clay, gray-brown, with some silt and trace of
		SC	Sand embedded in it with interbeds of sand,
			orange, very fine to medium grained.
		SC-SP	With localy clayey zones, brown to gray
15-20'			SAA, with traces of black, organic material (CL-OL)
			Mostly increasing clayey sand
20-25		SC-SP	SAA, no organic material observed
		a CL	Minor gravel to 1/2", sub ang.
25-30			SAA
30-35			SAA with increasing gravel, subang. to subround
			to 3/4"
35-40'			SAA, grayer color, decreasing gravel
40-45'		GP-CG	Clay, gray, silty to sandy, with traces of organic
		SC-CL	material with gravel, to 1", subround comprised
			of clinker material
45-50'		GP-GC	Sand brown to orange, very fine to mg, clayey
		SC	with gravel as above
50-55'			With interbeds of clay, dark gray, possibly
			organic (~~CL~~-OL)
55-60'			SAA with increasing gravel to 3/4"

* SEE EXPLANATIONS ON BACK

Q.C.

CDM

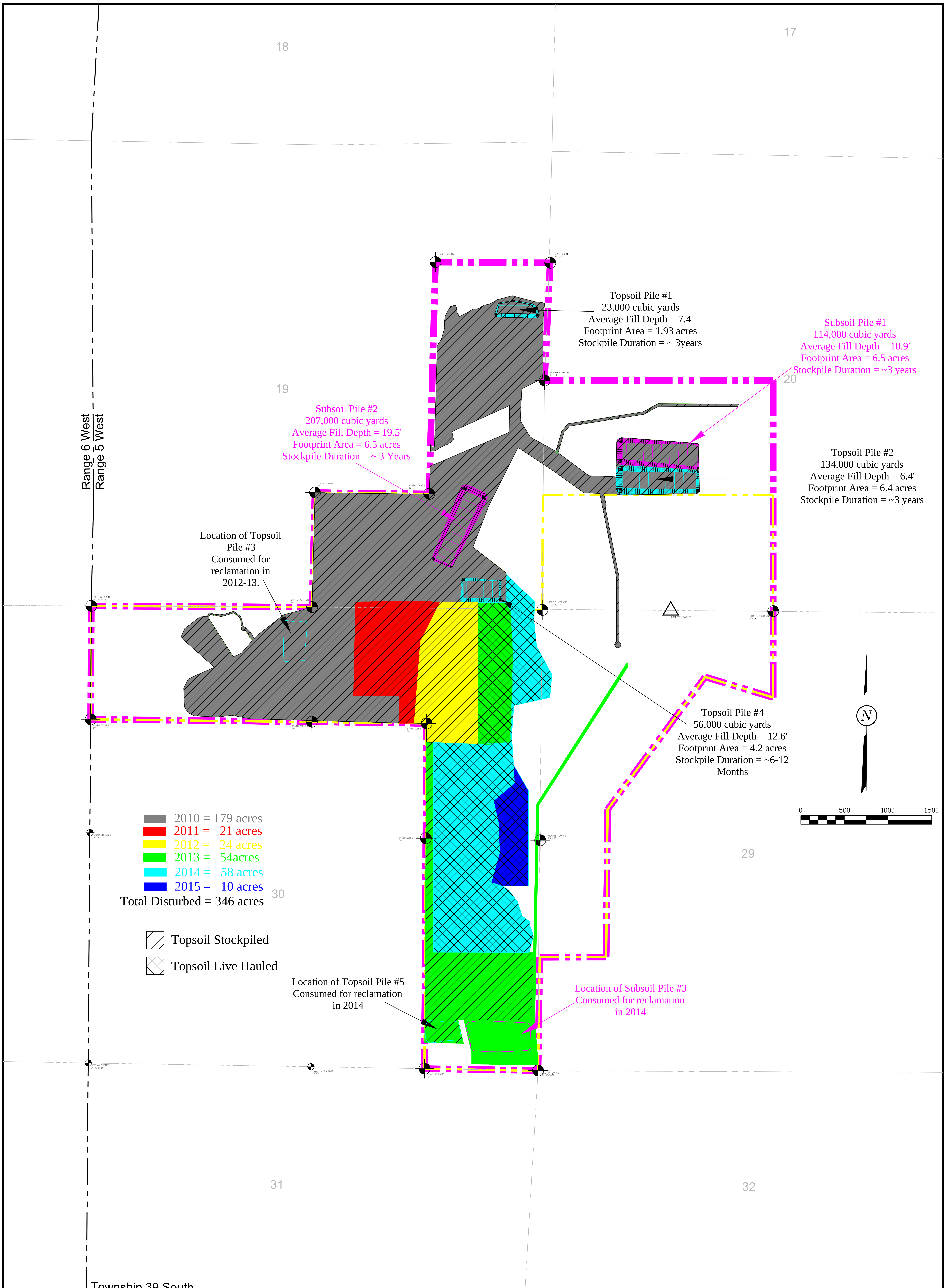
BOREHOLE LOG RECORD (cont) (A5)

Project Utah Int.-Alton Coal No. 8448-111 Q.A. No. F6132
By JGS Date 7/12/86 Page 2 of 2 Rev.
Chkd By Date Page of

Depth (ft)	Air Lift (Q)	Symbol	Material Description and Comments
60-65'		GP-GC	Gravel, brown to red, up to 3/4", subrounded to
		SC	subang. Some possibly larger with interbeds
			of sand, very fine to medium, gray to brown color
65-70'			SAA decreasing clay
70-75'		GP-SP	Mostly gravel, little clay recovered up to 1-1/2"
			with pebbles of black chert. Probably with
			sand, fine to coarse grained, tan and slightly
			silty to clayey (little recovered) 71-77'
75-80'			SAA
80-83'			SAA
83-85'			Claystone, dark grey, slightly silty. Top of
			bedrock, (Tropic Shale)
85-86'			Same as 83-85'
			6 bags of barite & 4 bags of revert used
			in the hole

* SEE EXPLANATIONS ON BACK

Q.C.



LEGEND:	DRAWN BY:	CHECKED BY:	REVISIONS	
PERMIT BOUNDARY	K.NICHOLES	LWJ	DATE:	BY:
PRIVATE COAL OWNERSHIP	DRAWING:	DATE:	12/04/14	KN
SECTION LINE	2-2	2/27/14		
FOUND SECTION CORNER		SCALE:		
FOUND PROPERTY CORNER		1" = 500'		
	JOB NUMBER: 1400	SHEET		

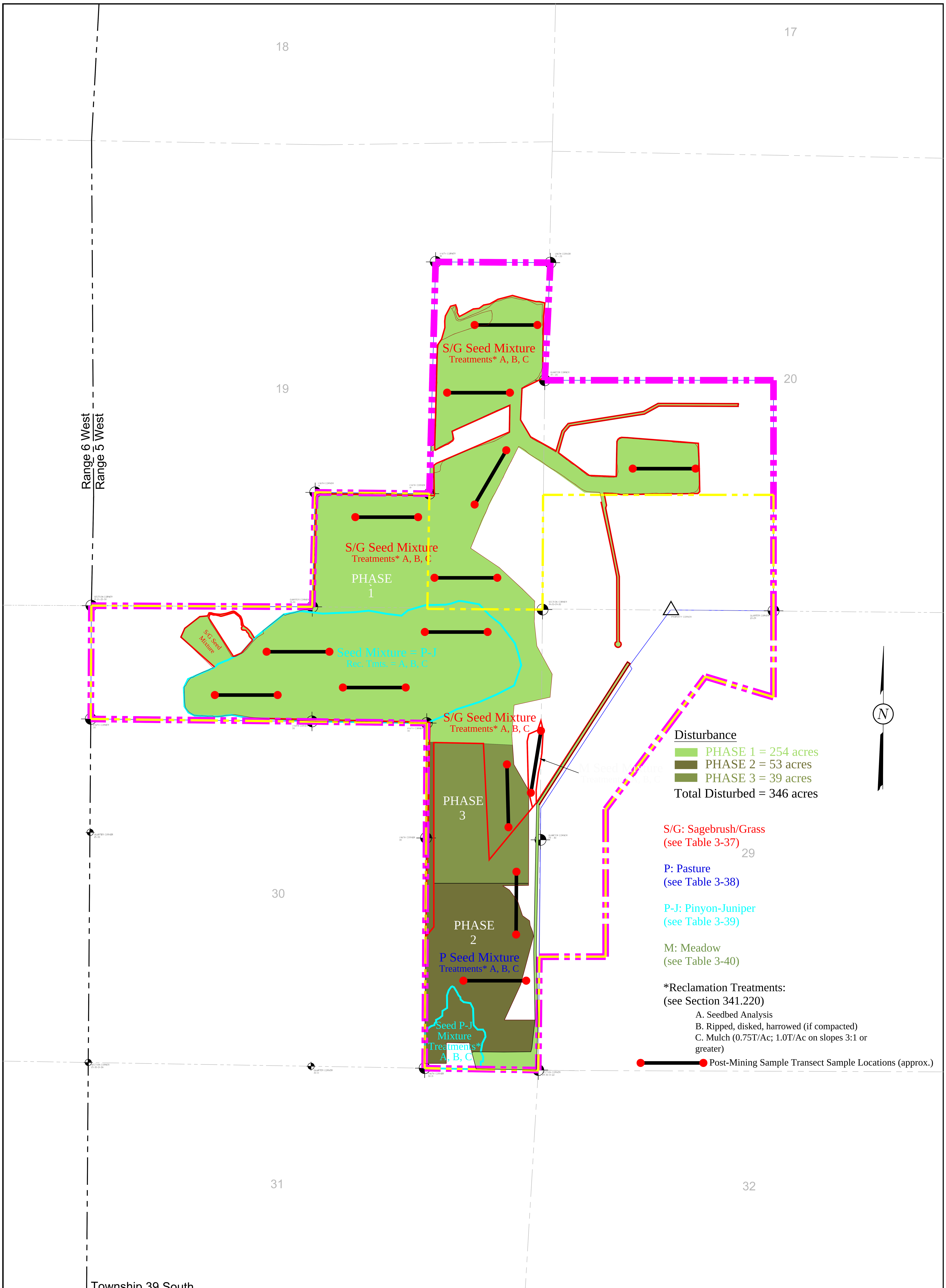
TOPSOIL HANDLING

COAL HOLLOW PROJECT
ALTON, UTAH

DRAWING: 2-2

Alton Coal Development
Coal Hollow Project

463 North 100 West, Suite 1
Cedar City, Utah 84721
Phone (435)867-5331
Fax (435)867-1192



LEGEND:
PERMIT BOUNDARY
PRIVATE COAL OWNERSHIP
SECTION LINE
FOUND SECTION CORNER
FOUND PROPERTY CORNER

DRAWN BY: K.NICHOLES
CHECKED BY: LWJ
DRAWING: 3-7
DATE: 2/26/14
SCALE: 1" = 500'
JOB NUMBER: 1400
SHEET

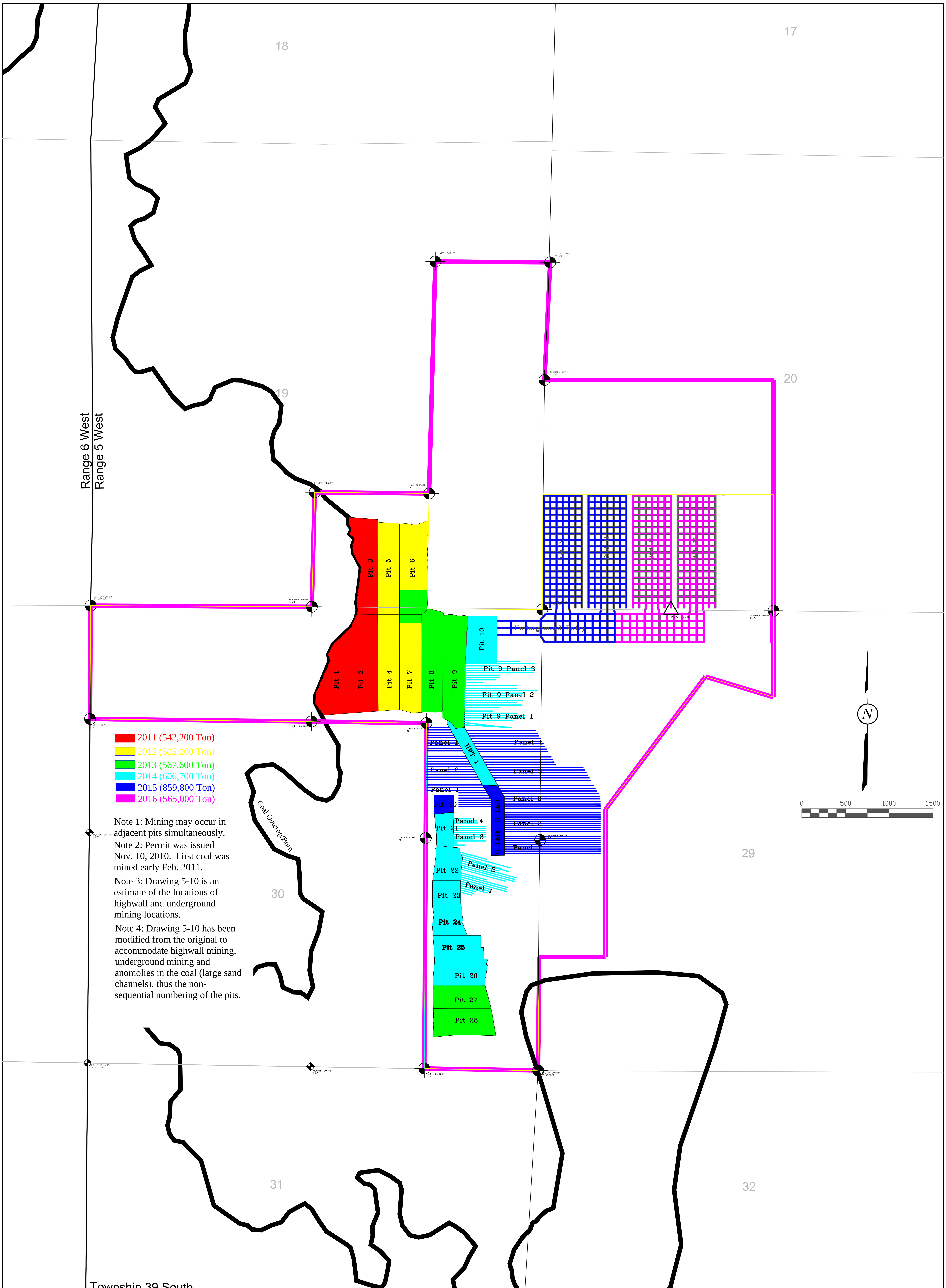
REVISIONS	
DATE:	BY:
02/26/14	KN
12/04/14	KN

RECLAMATION TREATMENTS, MONITORING & SAMPLE LOCATIONS

COAL HOLLOW PROJECT
ALTON, UTAH

DRAWING: 3-7

463 North 100 West, Suite 1
Cedar City, Utah 84721
Phone (435)867-5331
Fax (435)867-1192



Note 1: Mining may occur in adjacent pits simultaneously.

Note 2: Permit was issued Nov. 10, 2010. First coal was mined early Feb. 2011.

Note 3: Drawing 5-10 is an estimate of the locations of highwall and underground mining locations.

Note 4: Drawing 5-10 has been modified from the original to accommodate highwall mining, underground mining and anomolies in the coal (large sand channels), thus the non-sequential numbering of the pits.

LEGEND:
- PERMIT BOUNDARY
- PRIVATE COAL OWNERSHIP
- COAL LINE BOUNDARY
- COAL RECOVERY
- SECTION LINE
- FOUND SECTION CORNER
- FOUND PROPERTY CORNER

DRAWN BY:	CHECKED BY:
K. NICHOLES	LWJ
DRAWING:	DATE:
5-10	1/30/14
	SCALE:
	1" = 500'
JOB NUMBER:	SHEET
1400	

REVISIONS

DATE:	BY:
1/30/14	KN
5/7/14	KN
7/3/14	KN
10/31/14	KN

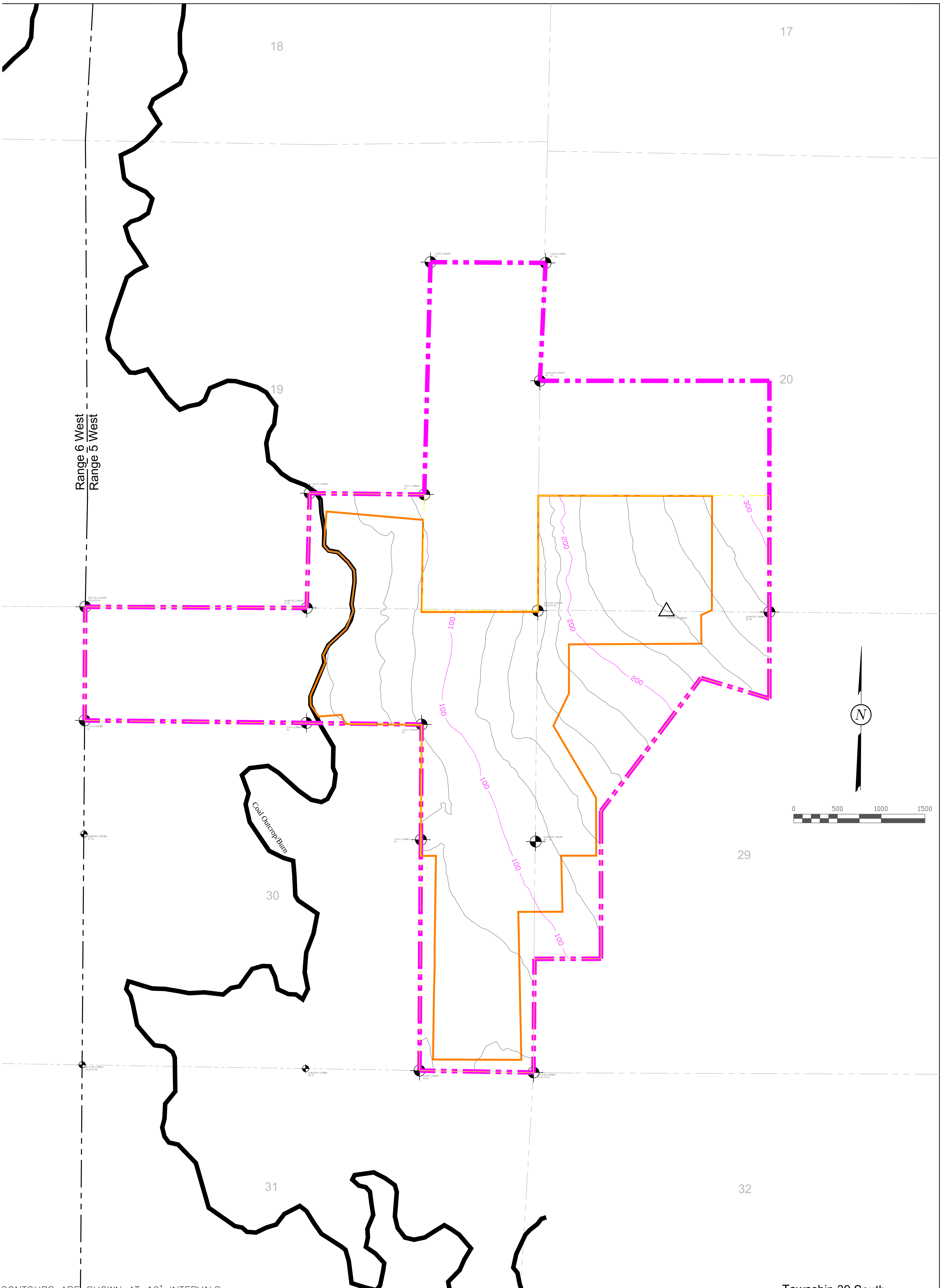
COAL REMOVAL SEQUENCE

COAL HOLLOW PROJECT
ALTON, UTAH

DRAWING: 5-10

UTAH REGISTERED PROFESSIONAL ENGINEER #154168 DAN W. GUY

Alton Coal Development
Coal Hollow Project
463 North 100 West, Suite 1
Cedar City, Utah 84721
Phone (435)867-5331
Fax (435)867-1192



CONTOURS ARE SHOWN AT 10' INTERVALS.

Township 39 South

LEGEND:
- PERMIT BOUNDARY
- PRIVATE COAL OWNERSHIP
- COAL LINE BOUNDARY
- COAL RECOVERY LINE
- SECTION LINE
- FOUND SECTION CORNER
- FOUND PROPERTY CORNER

DRAWN BY:	CHECKED BY:
C. McCOURT	DWG
DRAWING: 5–15	DATE: 4/20/07
	SCALE: 1" = 500'
JOB NUMBER: 1400	SHEET

REVISIONS

DATE:	BY:
9/16/08	CRM
6/26/14	KN
12/26/14	KN

OVERBURDEN ISOPACH

COAL HOLLOW PROJECT
ALTON, UTAH

DRAWING: 5-15

UTAH REGISTERED PROFESSIONAL ENGINEER #154168 DAN W. GUY

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Coal Hollow Project

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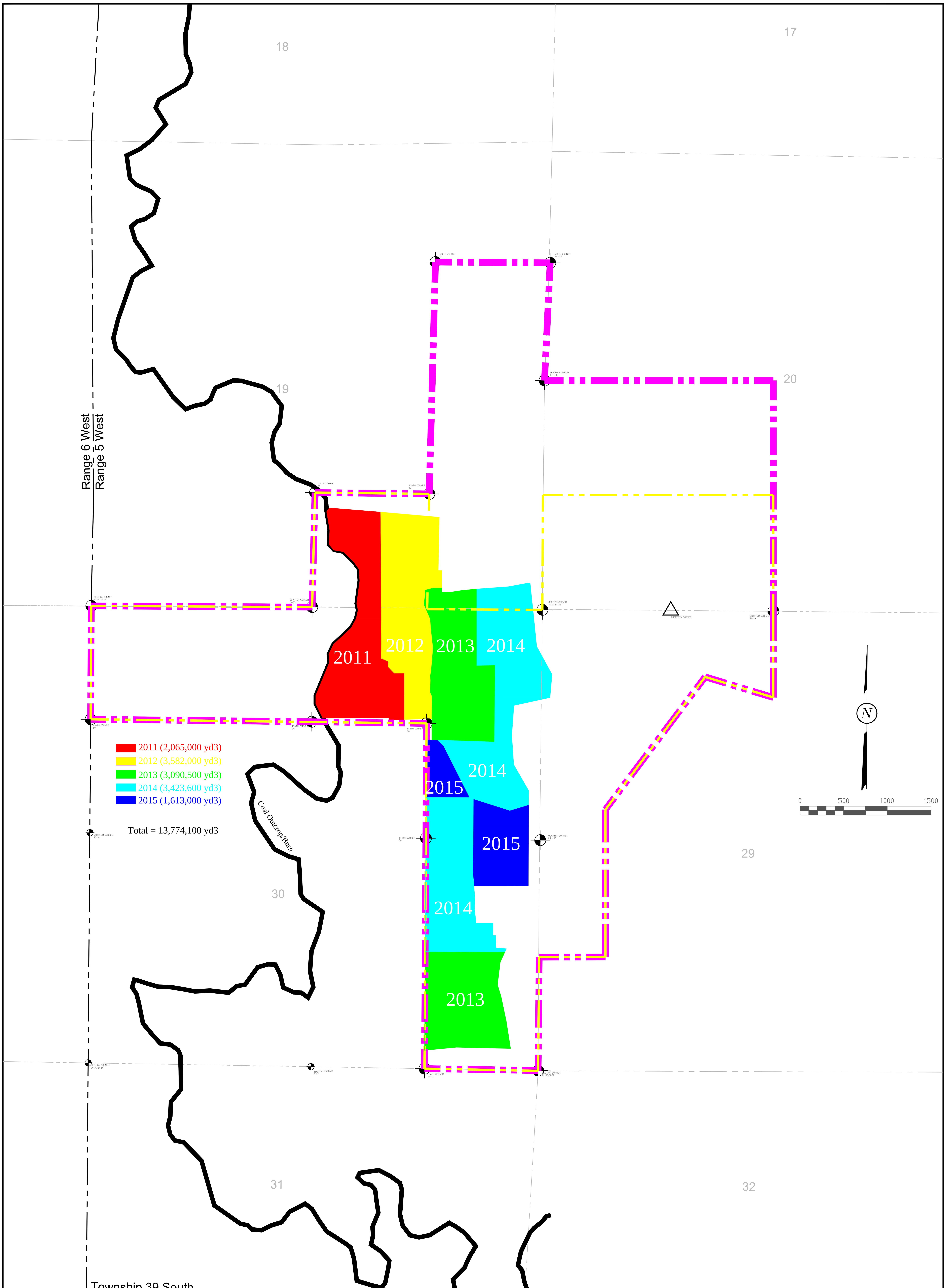

LEGEND:	DRAWN BY:	CHECKED BY:	REVISIONS		
PERMIT BOUNDARY	K. NICHOLES	LWJ	DATE:	BY:	
PRIVATE COAL OWNERSHIP	DRAWING:	DATE: 02/26/2014	KN	02/26/14	
COAL LINE BOUNDARY	5-16	SCALE: 1" = 500'	KN	05/09/14	
SECTION LINE			KN	11/24/14	
FOUND SECTION CORNER	JOB NUMBER:	SHEET	KN	12/12/14	
FOUND PROPERTY CORNER	1400				

OVERBURDEN REMOVAL SEQUENCE

COAL HOLLOW PROJECT
ALTON, UTAH

DRAWING: 5-16

UTAH REGISTERED PROFESSIONAL ENGINEER #154168 DAN W. GUY

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Cedar City, Utah 84721
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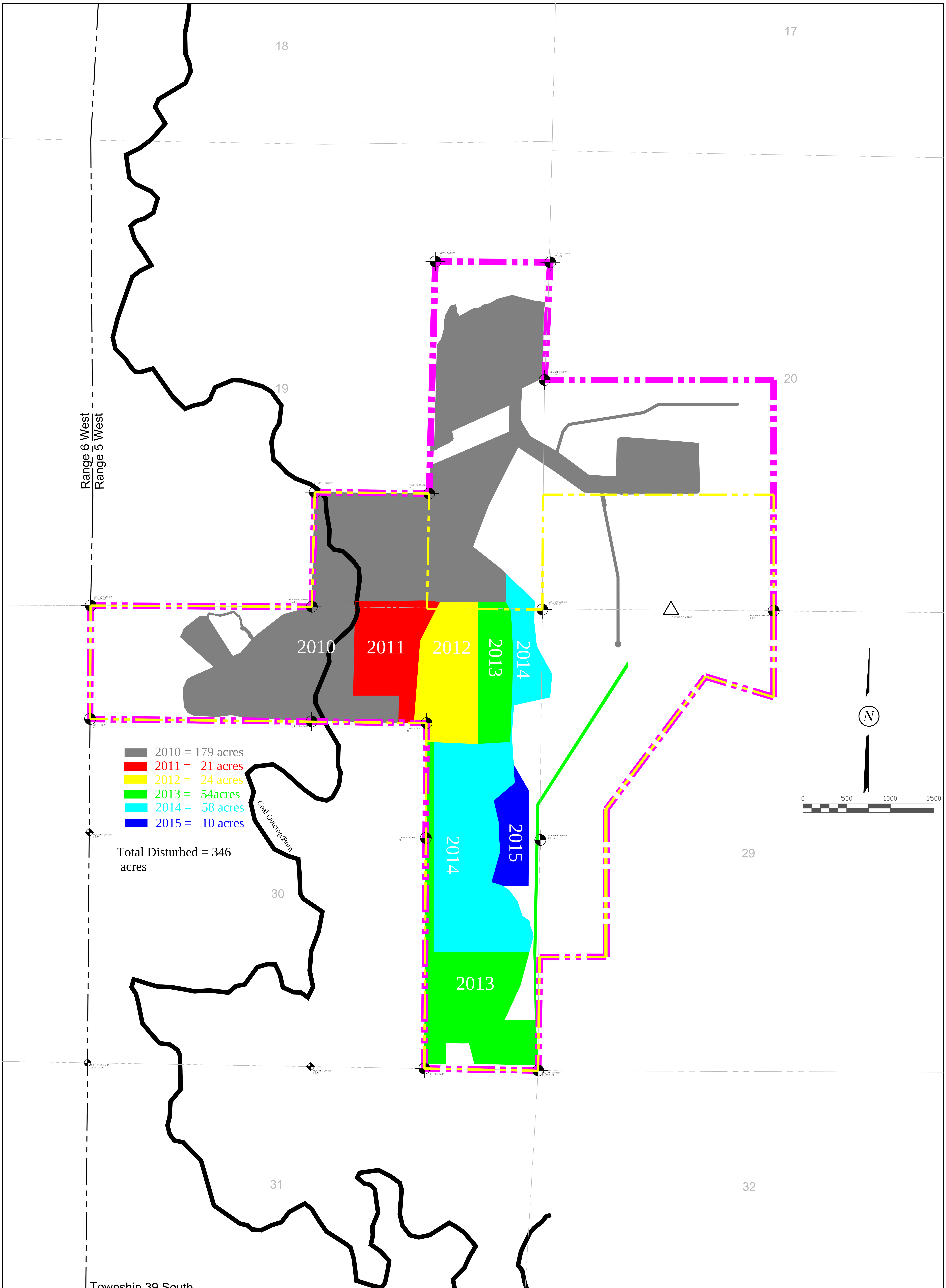
Fax (435)867-1192



LEGEND:
PERMIT BOUNDARY
PRIVATE COAL OWNERSHIP
COAL LINE BOUNDARY
SECTION LINE
FOUND SECTION CORNER
FOUND PROPERTY CORNER

DRAWN BY: C. McCOURT
CHECKED BY: LWJ
DRAWING: 5-2
DATE: 10/15/2013
SCALE: 1" = 500'
JOB NUMBER: 1400
SHEET

REVISIONS

DATE:	BY:
10/19/13	KN
5/7/14	KN
11/19/14	KN

DISTURBANCE SEQUENCE

COAL HOLLOW PROJECT
ALTON, UTAH

DRAWING: 5-2

UTAH REGISTERED PROFESSIONAL ENGINEER #154168 DAN W. GUY

Alton Coal Development
Coal Hollow Project

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Cedar City, Utah 84721
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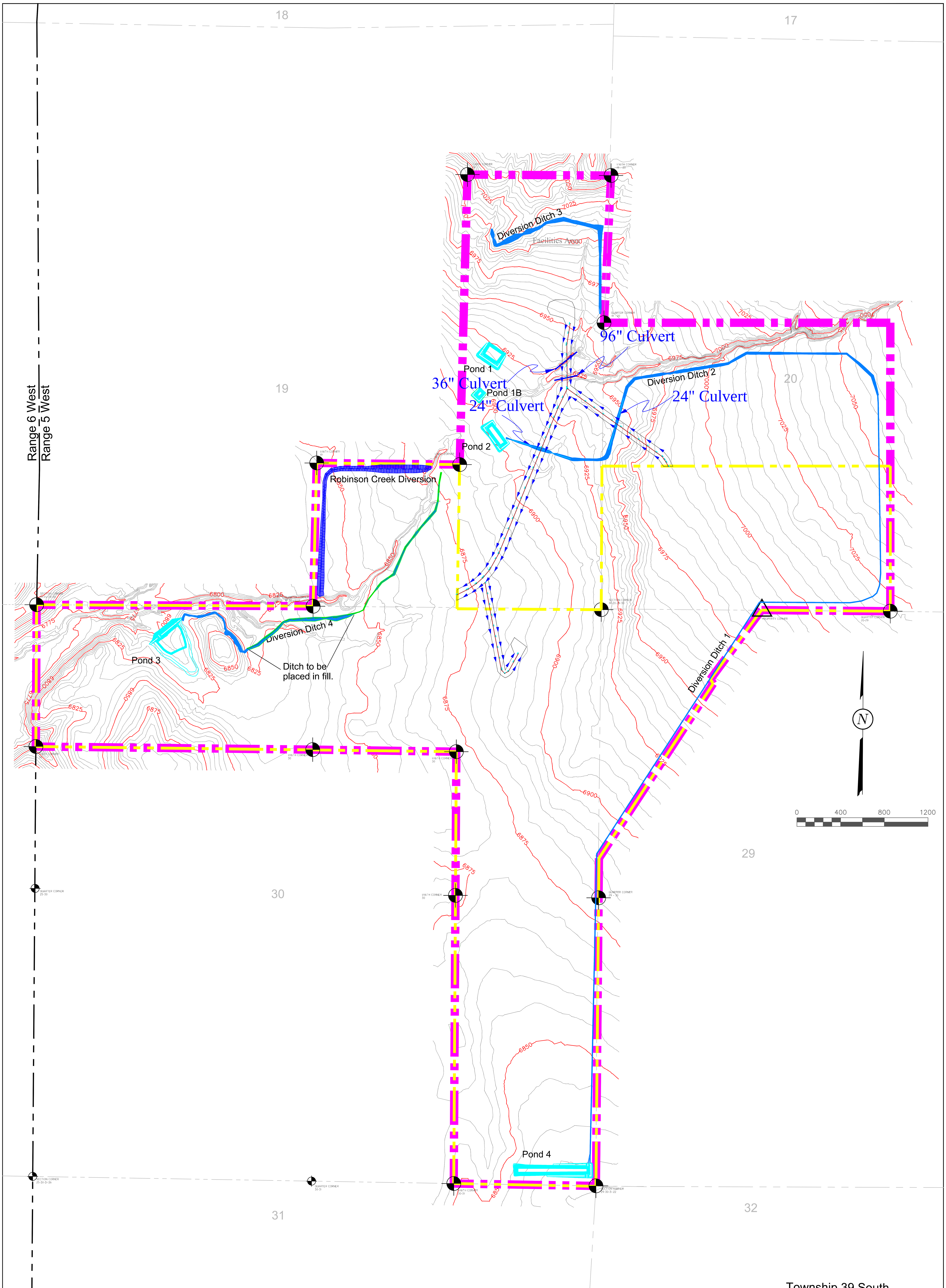
Fax (435)867-1192



LEGEND:
- PERMIT BOUNDARY
- PRIVATE COAL OWNERSHIP
- COAL LINE BOUNDARY
- SECTION LINE
- FOUND SECTION CORNER
- FOUND PROPERTY CORNER
- PROPOSED SEDIMENT IMPOUNDS
- PROPOSED DIVERSION DITCHES
- ROAD FLOWLINES

DRAWN BY: J. STANSFIELD

CHECKED BY: CRM/GG

DRAWING: 5-22

DATE: 4/20/07

SCALE: 1" = 400'

JOB NUMBER: 1400

SHEET

REVISIONS

DATE:	BY:
9/16/08	CRM
11/25/14	KN

PRIMARY MINE HAUL ROADS PLAN VIEW

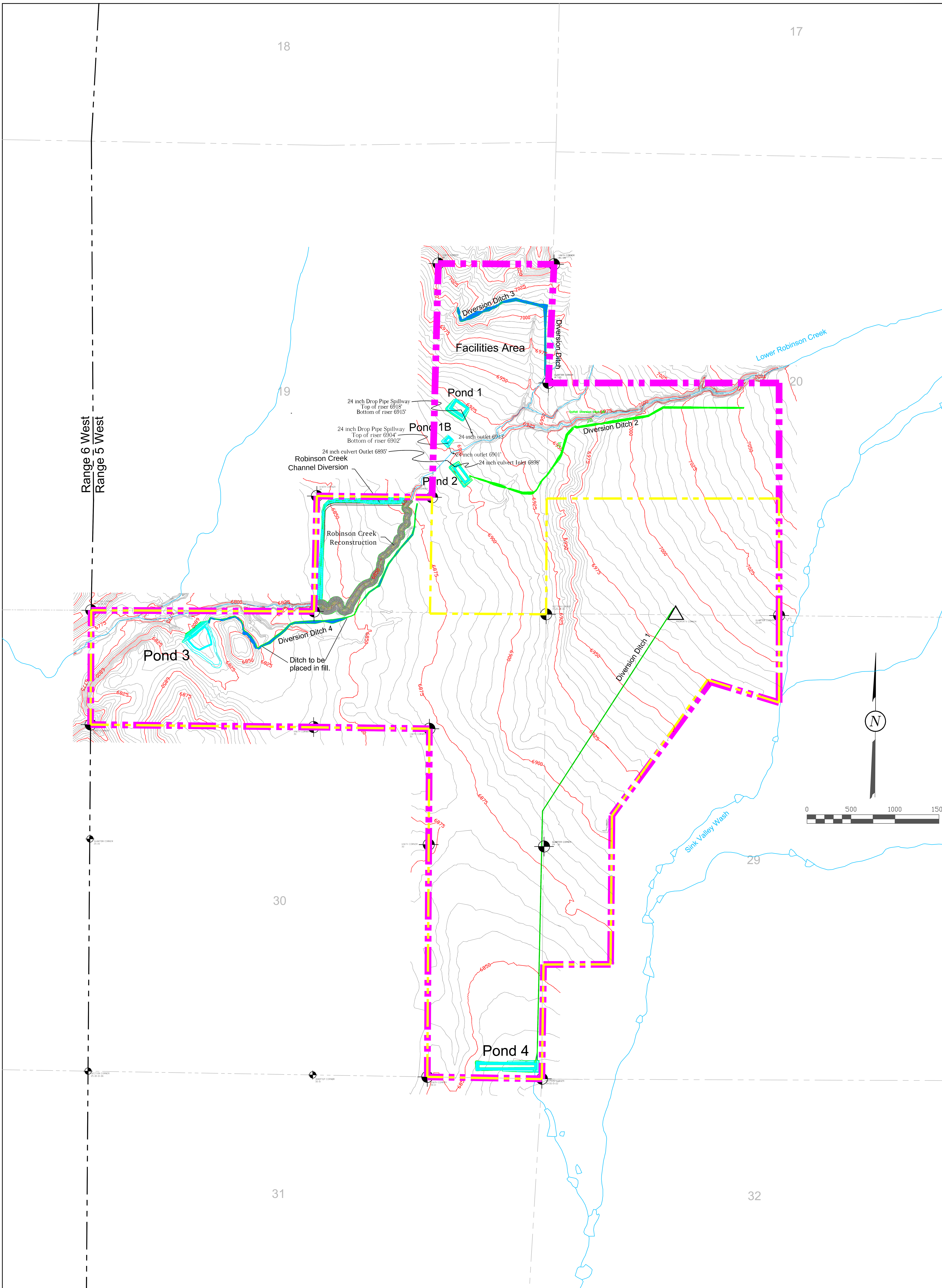
COAL HOLLOW PROJECT
ALTON, UTAH

DRAWING: 5-22

UTAH REGISTERED PROFESSIONAL ENGINEER #154168 DAN W. GUY

Alton Coal Development
Coal Hollow Project

463 North 100 West, Suite 1
Cedar City, Utah 84720
Phone (435)867-5331
Fax (435)867-1192



LEGEND:
PERMIT BOUNDARY
PRIVATE COAL OWNERSHIP
SECTION LINE
FOUND SECTION CORNER
FOUND PROPERTY CORNER
PROPOSED SEDIMENT IMPOUNDS
DIVERSION DITCHES
EXISTING DRAINAGES

DRAWN BY: J. STANSFIELD	CHECKED BY: DWG
DRAWING: 5-25	DATE: 4/20/07
	SCALE: 1" = 500'
JOB NUMBER: 1400	SHEET

REVISIONS

DATE:	BY:
12/02/08	CRM
11/04/14	KN

DIVERSION DITCH & SEDIMENT IMPOUND PLAN VIEW

COAL HOLLOW PROJECT
ALTON, UTAH

DRAWING: 5-25

UTAH REGISTERED PROFESSIONAL ENGINEER #154168 DAN W. GUY

Alton Coal Development
Coal Hollow Project

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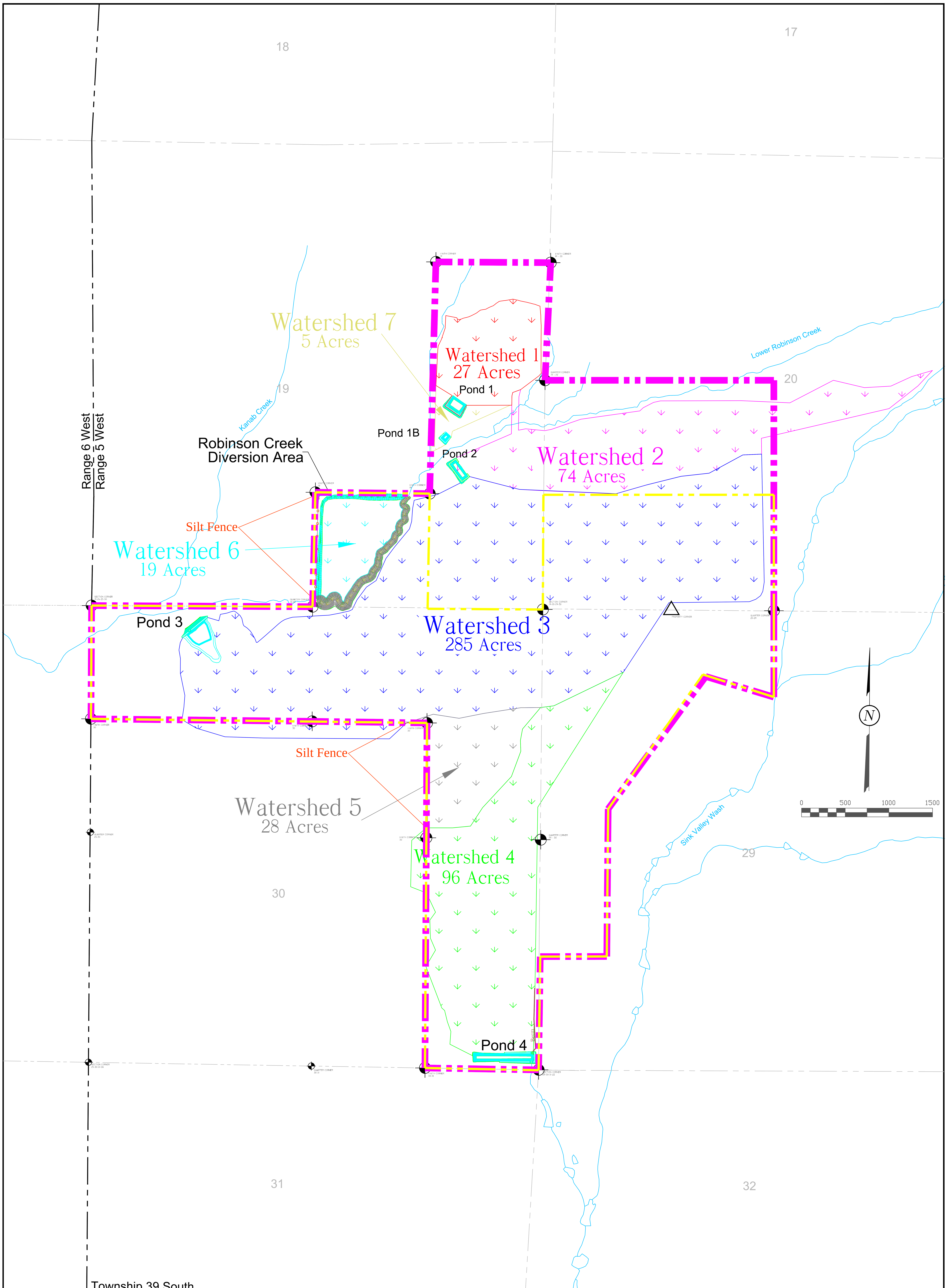

LEGEND:		
PERMIT BOUNDARY		
PRIVATE COAL OWNERSHIP		
SECTION LINE		
FOUND SECTION CORNER		
FOUND PROPERTY CORNER		
EXISTING DRAINAGES		
PROPOSED SEDIMENT IMPOUNDS		
SILT FENCE		

DRAWN BY:	CHECKED BY:
C. McCOURT	DWG
DRAWING:	DATE:
5-26	4/20/07
	SCALE:
	1" = 500'
JOB NUMBER:	SHEET
1400	

REVISIONS

DATE:	BY:
12/02/08	CRM
08/12/13	KN
11/04/14	KN

SEDIMENT IMPOUND WATERSHEDS

COAL HOLLOW PROJECT
ALTON, UTAH

DRAWING: 5-26

UTAH REGISTERED PROFESSIONAL ENGINEER #154168 DAN W. GUY

Coal Hollow Project
Alton Coal Development

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Cedar City, Utah 84721
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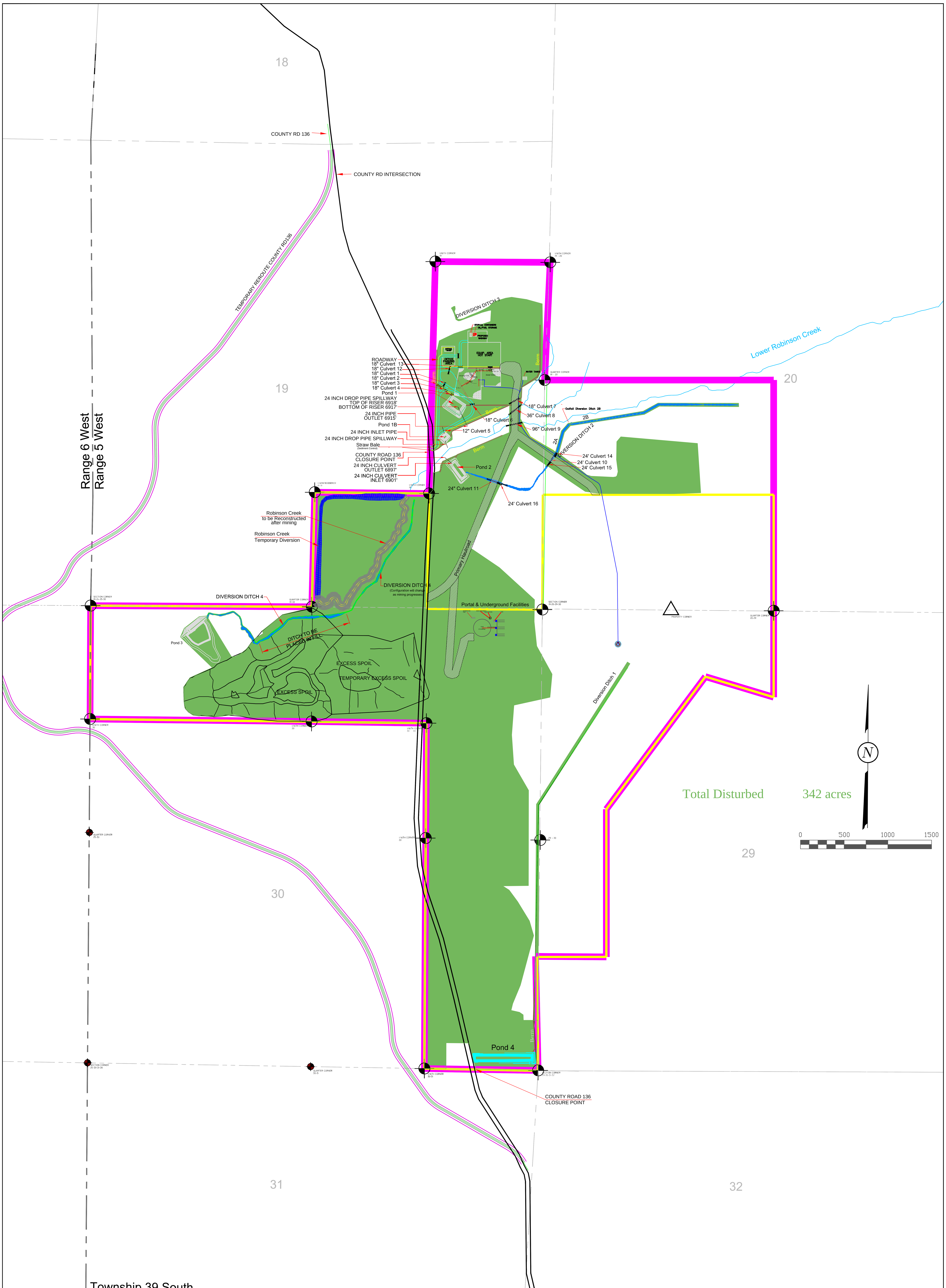
Fax (435)867-1192



LEGEND:
PERMIT BOUNDARY
PRIVATE COAL OWNERSHIP
SECTION LINE
FOUND SECTION CORNER
FOUND PROPERTY CORNER
DIVERSION DITCHES
PROPOSED SEDIMENT IMPOUNDS
BERM
CENTERLINE
WATER LINE
WATER TANK / WELL

DRAWN BY: K. NICHOLES	CHECKED BY: LWJ
DRAWING: 5–3	DATE: 07/02/14
	SCALE: 1" = 500'
JOB NUMBER: 1400	SHEET

REVISIONS

DATE:	BY:
07/02/14	KN
12/04/14	KN

FACILITIES & STRUCTURES LAYOUT

COAL HOLLOW PROJECT
ALTON, UTAH

DRAWING: 5-3

UTAH REGISTERED PROFESSIONAL ENGINEER #154168 DAN W. GUY

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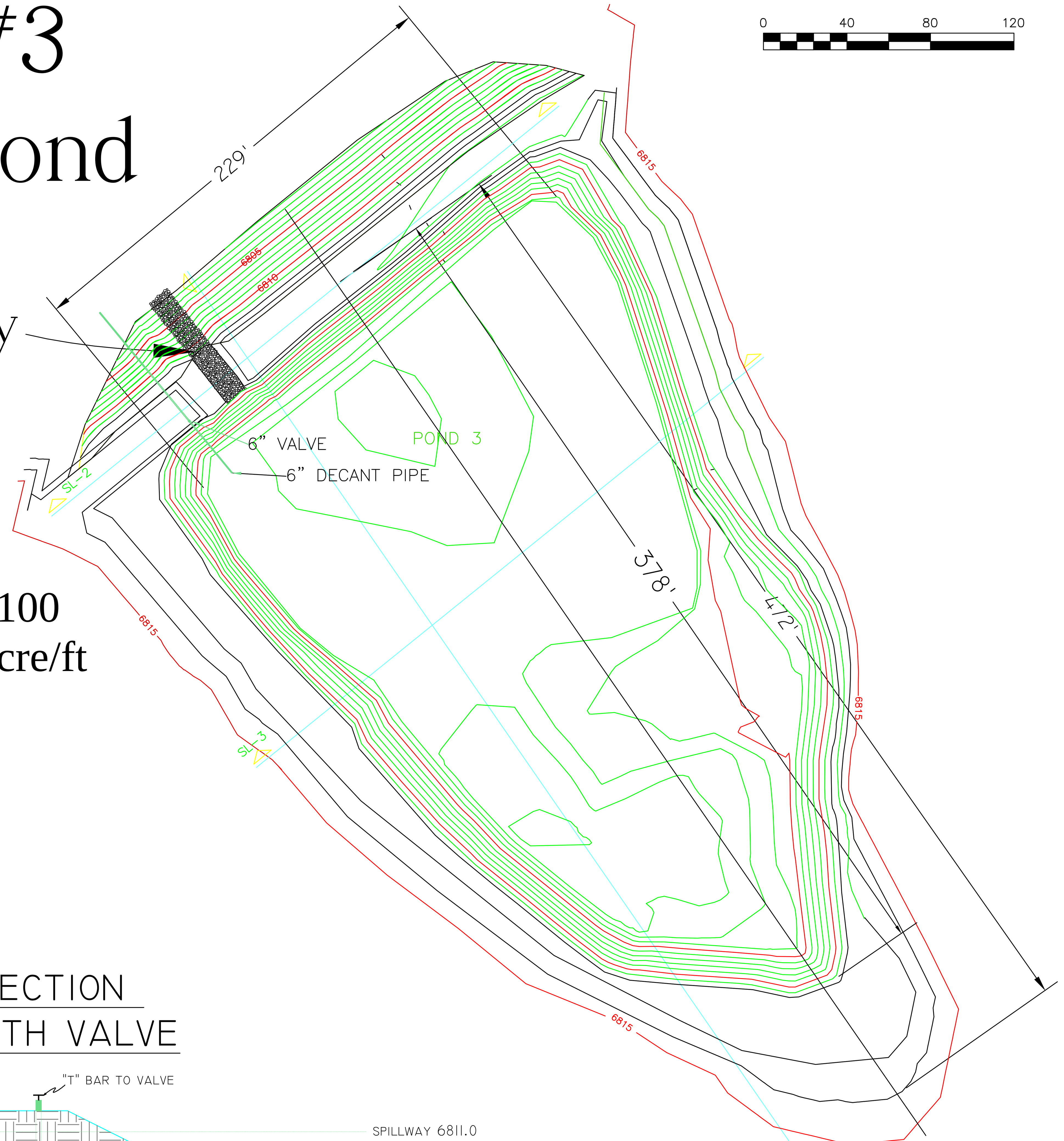
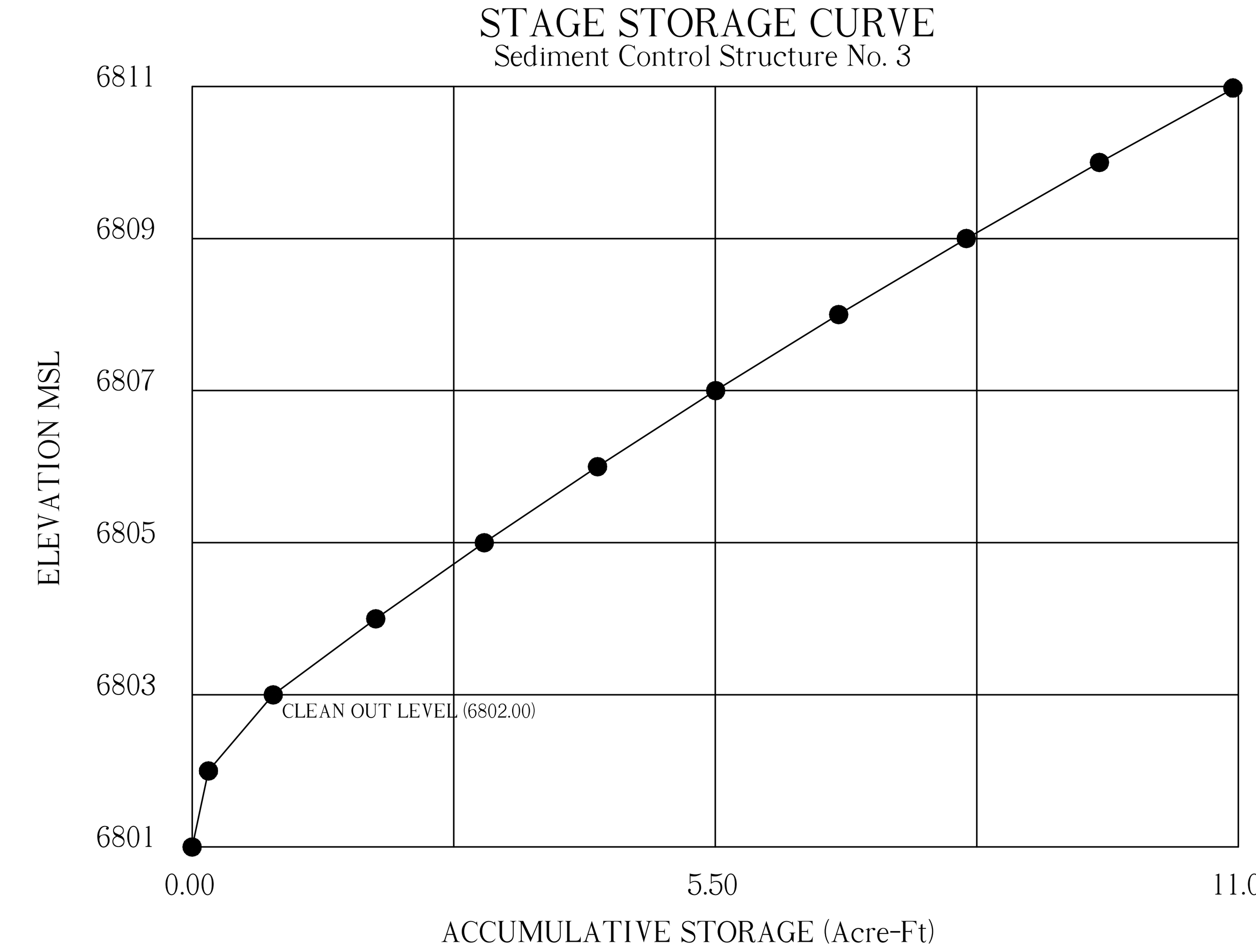
Fax (435)867-1192

Pond #3
Valley Pond

Spillway
at 6811’

Required Storage for 100 year, 24 event = 6.3 acre/ft

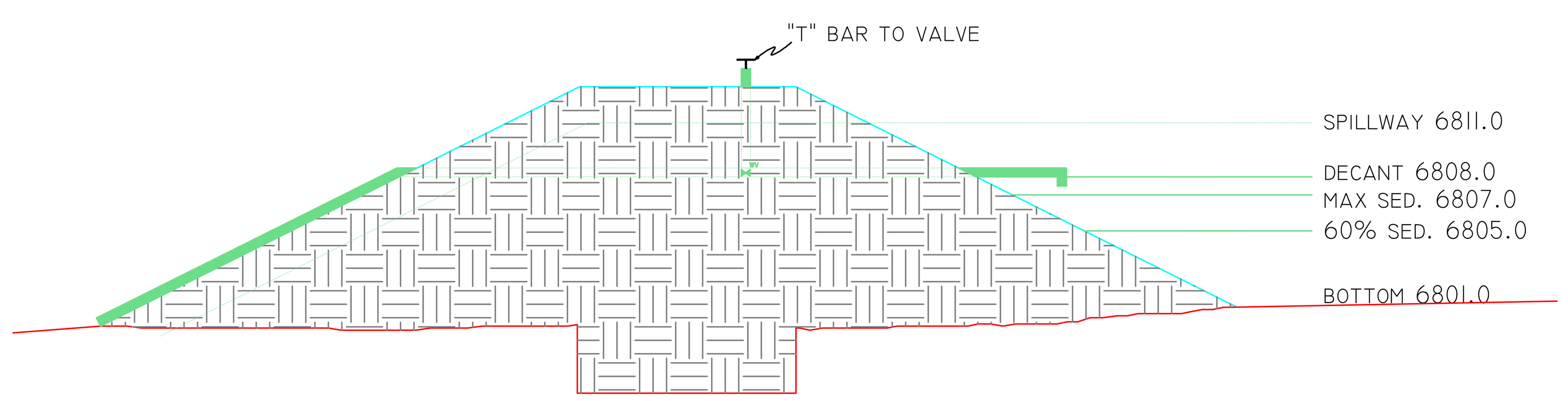




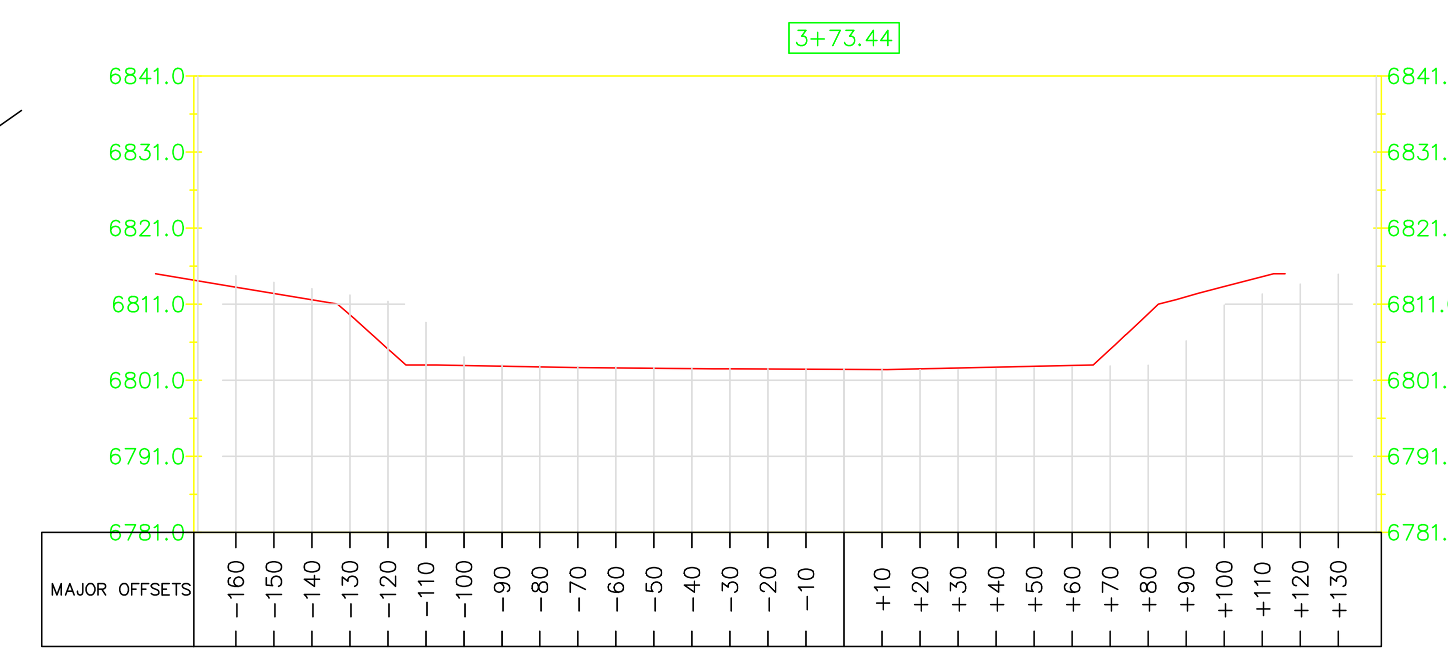
STORAGE VOLUME COMPUTATIONS
Sediment Control Structure No. 3

ELEV. (ft)	WIDTH (ft)	LENGTH (ft)	AREA (ac)	AVG. AREA (ac)	INTERVAL (ft)	STORAGE (ac-ft)	ACC. STORAGE (ac-ft)	STAGE INTERVAL (ft)
6801.00	NA	NA	0.0000					
6802.00	NA	NA	0.3947	0.3947	1.00	0.3947	0.3947	1.00
6803.00	NA	NA	1.0730	0.7339	1.00	0.7339	1.1286	2.00
6804.00	NA	NA	1.2194	1.1462	1.00	1.1462	2.2748	3.00
6805.00	NA	NA	1.3500	1.2847	1.00	1.2847	3.5595	4.00
6806.00	NA	NA	1.4461	1.3981	1.00	1.3981	4.9575	5.00
6807.00	NA	NA	1.5138	1.4800	1.00	1.4800	6.4375	6.00
6808.00	NA	NA	1.5730	1.5434	1.00	1.5434	7.9809	7.00
6809.00	NA	NA	1.6309	1.6020	1.00	1.6020	9.5828	8.00
6810.00	NA	NA	1.6893	1.6601	1.00	1.6601	11.2429	9.00
6811.00	NA	NA	1.7484	1.7189	1.00	1.7189	12.9618	10.00
6812.00	NA	NA	1.1831	1.4658	1.00	1.4658	14.4275	11.00

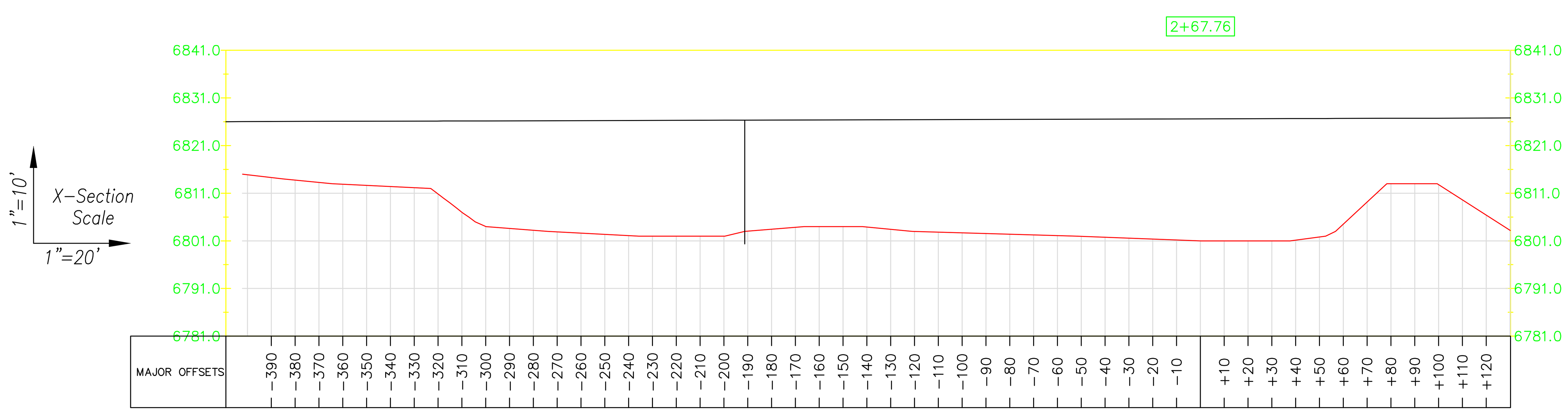
CROSS SECTION
DECANT WITH VALVE



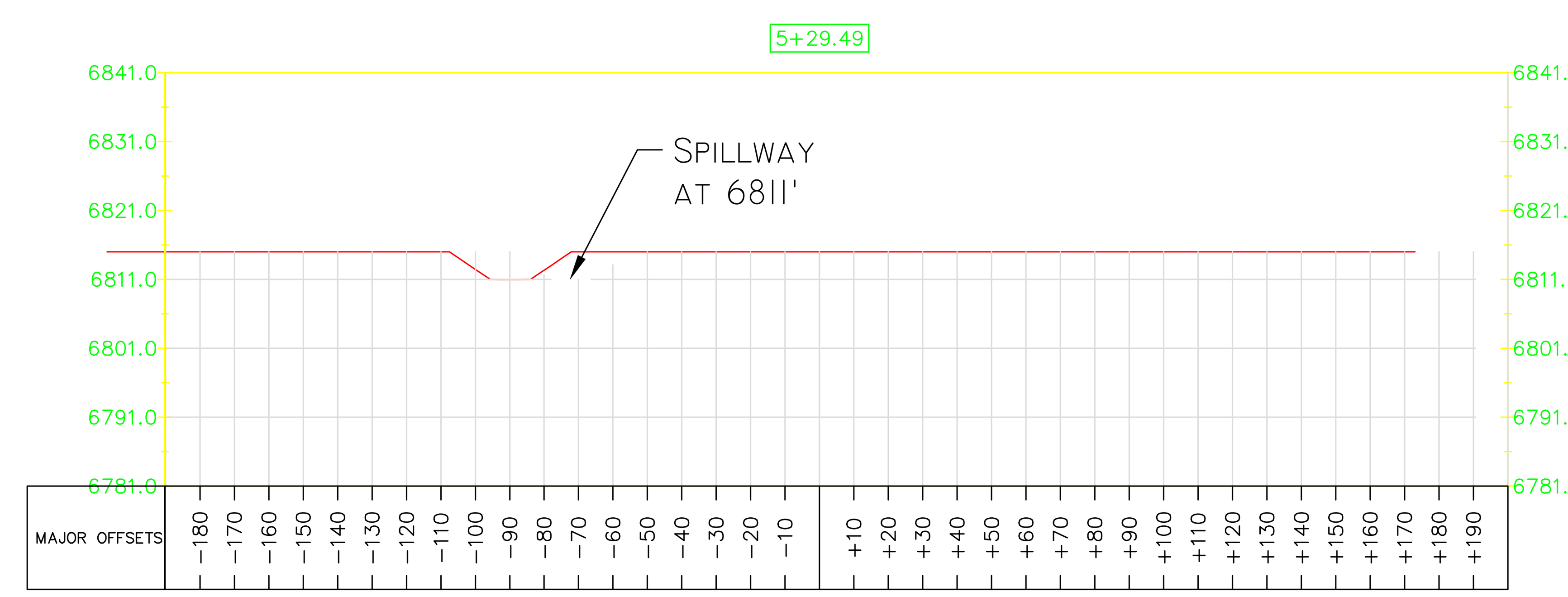
NOTE: MAX SED. ELEV. IS REDUCED FOR FIXED DECANT TO BE AT 6808.0. ALLOWS FOR 100 YR./ 24HR. EVENT.



SL-3



SL-1



SL-2

Alton Coal Development
Coal Hollow Project
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Phone (435)867-5331
Fax (435)867-1192

UTAH REGISTERED PROFESSIONAL ENGINEER #154168 DAN W. GUY

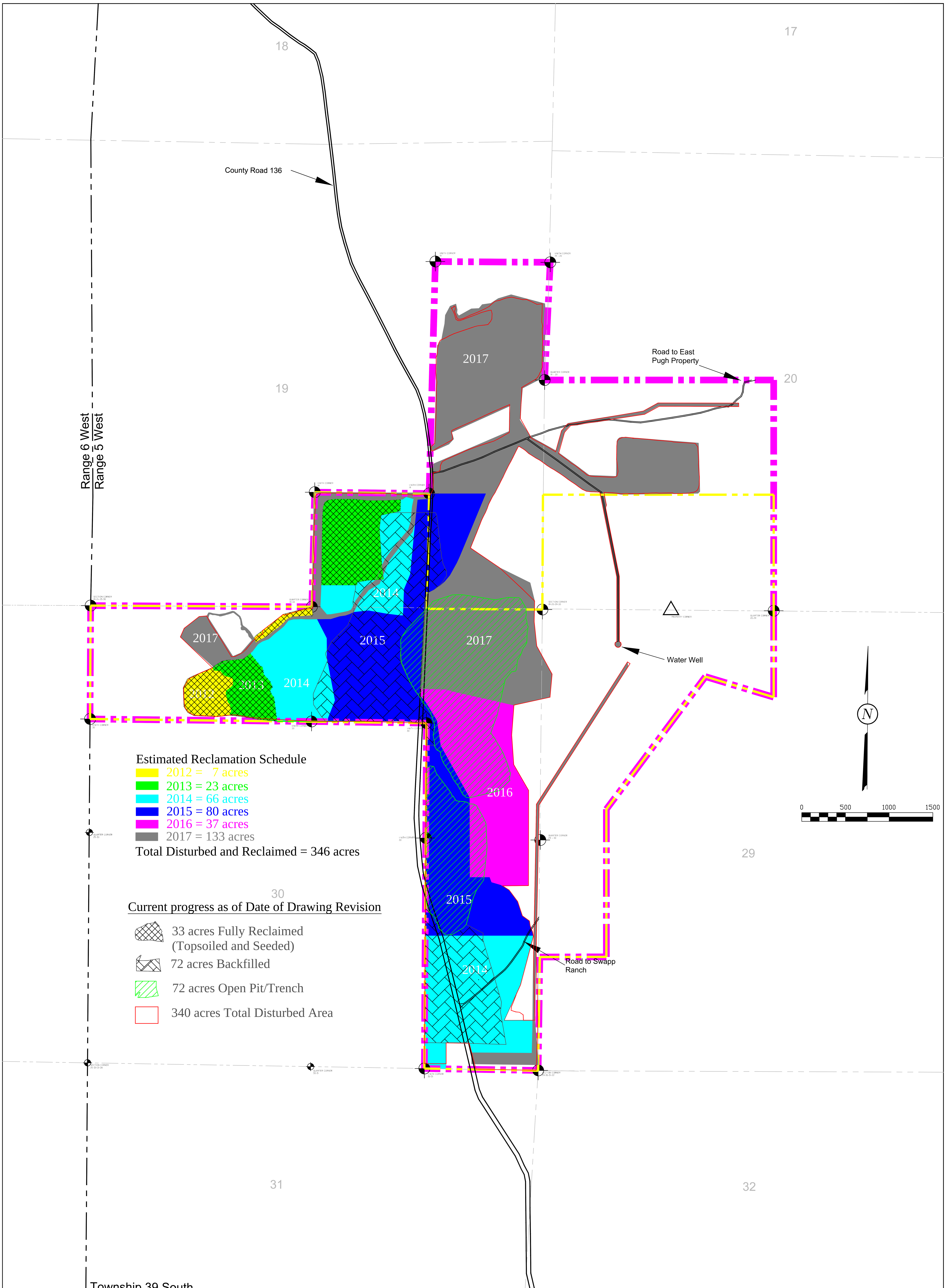
SEDIMENT IMPOUNDMENT 3 DETAILS

COAL HOLLOW PROJECT
ALTON, UTAH

DRAWING: 5-30

REVISIONS	
DATE:	BY:
12-04-08	CRM
12-20-14	KN

DRAWN BY: C. MCCOURT	CHECKED BY: GG
DRAWING: 5-30	DATE: 12/18/06
	SCALE: 1" = 40'
JOB NUMBER: 1400	SHEET



LEGEND:	DRAWN BY: K. NICHOLES	CHECKED BY: LWJ	REVISIONS		RECLAMATION SEQUENCE
PERMIT BOUNDARY	DRAWING: 5-38	DATE: 12/18/2014	DATE:	BY:	COAL HOLLOW PROJECT ALTON, UTAH
PRIVATE COAL OWNERSHIP		SCALE: 1" = 500'	12/18/14	KN	DRAWING: 5-38
SECTION LINE	JOB NUMBER: 1400	SHEET			
FOUND SECTION CORNER					
FOUND PROPERTY CORNER					
POSTMINING ROADS					

UTAH REGISTERED PROFESSIONAL ENGINEER #154168 DAN W. GUY

Alton Coal Development
Coal Hollow Project

463 North 100 West, Suite 1
Cedar City, Utah 84721
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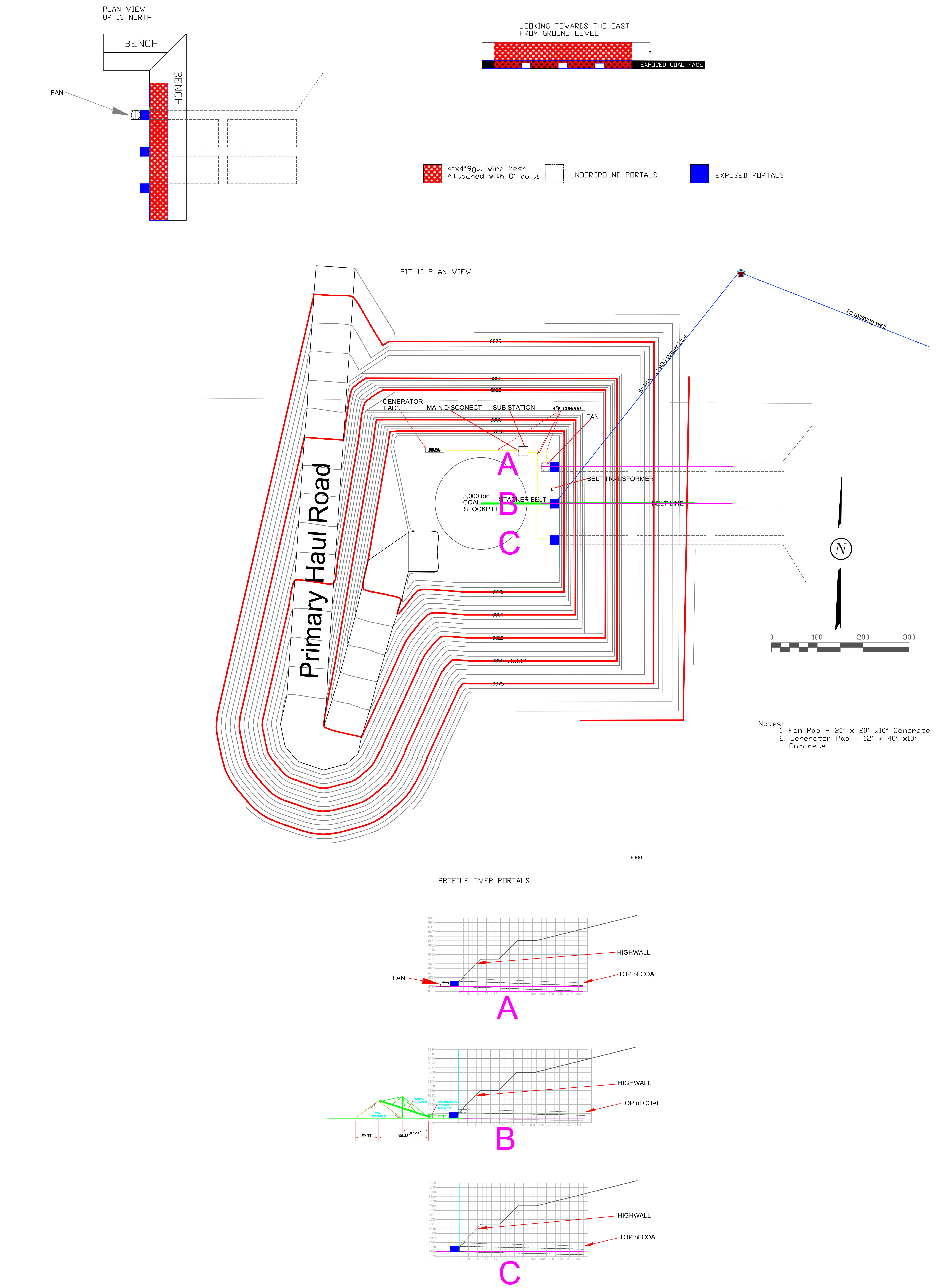
Fax (435)867-1192



Notes:
1. Fan Pad - 20' x 20' x10" Concrete
2. Generator Pad - 12' x 40' x10" Concrete

LEGEND:

SECTION LINE
FOUND SECTION CORNER
FOUND PROPERTY CORNER
ELECTRICAL CONDUIT
WATER TANK / WELL
PROPOSED 6" PVC C-900 WATER LINE

DRAWN BY: K. NICHOLES	CHECKED BY: LWJ
DRAWING: 5-3B	DATE: 07/02/14
	SCALE: 1" = 100'
JOB NUMBER:	SHEET

REVISIONS

DATE:	BY:
07/02/14	KN
12/18/14	KN

UNDERGROUND FACILITIES & STRUCTURES LAYOUT

COAL HOLLOW PROJECT
ALTON, UTAH

DRAWING: 5-3B

UTAH REGISTERED PROFESSIONAL ENGINEER #154168 DAN W. GUY

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Coal Hollow Project
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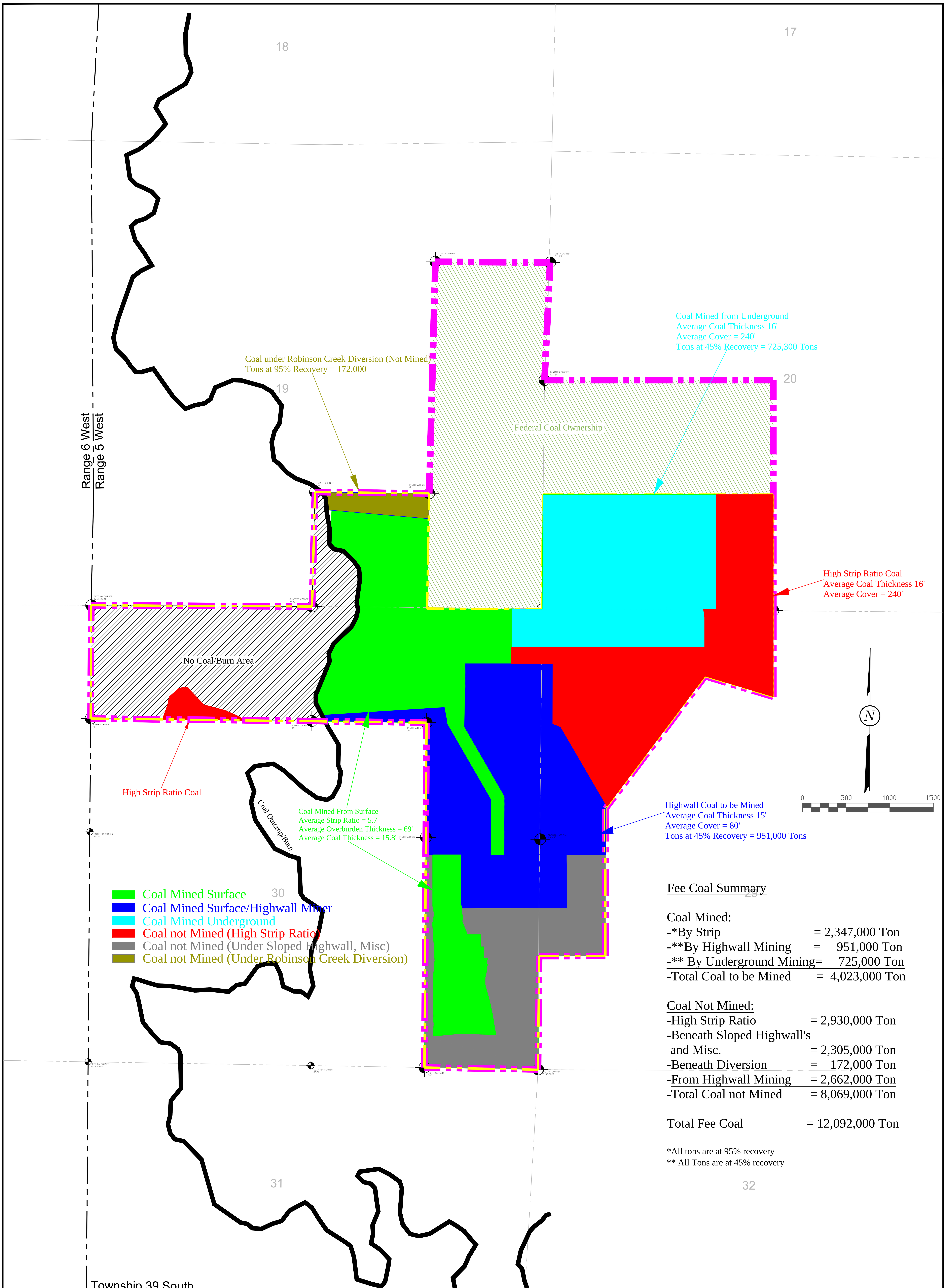
Fax (435)867-1192



LEGEND:
PERMIT BOUNDARY
PRIVATE COAL OWNERSHIP
COAL LINE BOUNDARY
SECTION LINE
FOUND SECTION CORNER
FOUND PROPERTY CORNER

DRAWN BY:	CHECKED BY:
K. NICHOLES	LWJ
DRAWING: 5-9	DATE: 5/09/14
	SCALE: 1" = 500'
JOB NUMBER: 1400	SHEET

REVISIONS

DATE:	BY:
05/09/14	KN
07/03/14	KN
11/24/14	KN

COAL EXTRACTION OVERVIEW

COAL HOLLOW PROJECT
ALTON, UTAH

DRAWING: 5-9

UTAH REGISTERED PROFESSIONAL ENGINEER #154168 DAN W. GUY

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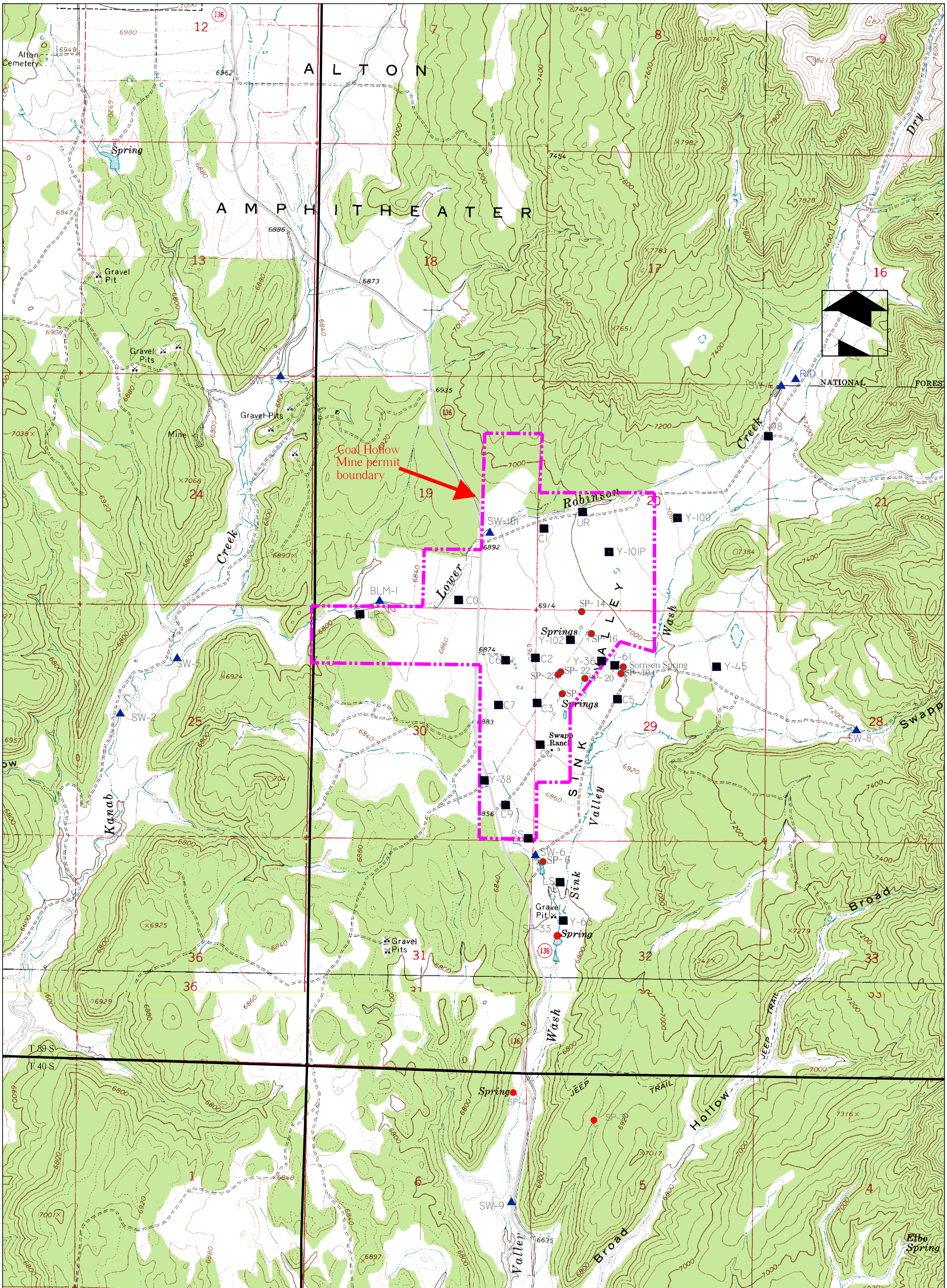
Fax (435)867-1192



LEGEND:

PERMIT BOUNDARY

COUNTY ROAD

SPRING MONITORING STATION

SURFACE WATER STATION

WELL MONITORING STATION

DRAWN BY:	CHECKED BY:
C. McCOURT	ECP
DRAWING:	DATE:
7–10	8/26/09
	SCALE:
	1" = 1000'
JOB NUMBER:	SHEET
1400	

REVISIONS

DATE:	BY:
11/14/12	KN
10/25/13	KN
11/06/14	KN

WATER MONITORING LOCATIONS

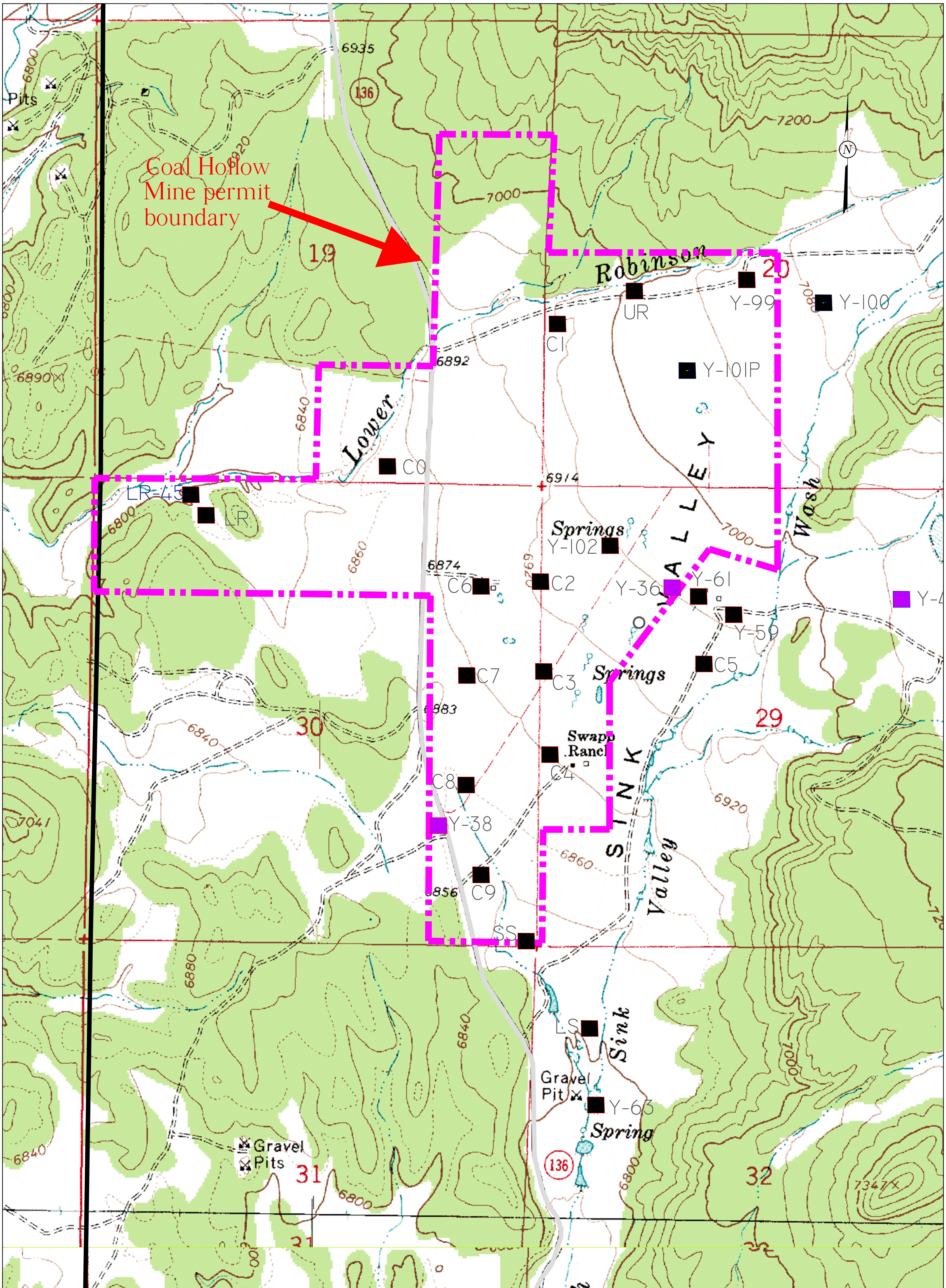
COAL HOLLOW PROJECT
ALTON, UTAH

DRAWING: 7-10

ERIK CARL PETERSEN
5373615-2250

Alton Coal Development
Coal Hollow Project

463 North 100 West, Suite 1
Cedar City, Utah 84721
Phone (435)867-5331
Fax (435)867-1192



LEGEND:

PERMIT BOUNDARY

COAL MONITORING WELL

ALLUVIAL MONITORING WELL

DRAWN BY: E. PETERSEN

CHECKED BY: ECP

DRAWING: 7-12

DATE: 4/20/07

SCALE: 1" = 500'

JOB NUMBER: 1400

SHEET

REVISIONS	
DATE:	BY:
12/18/08	ECP
10/25/13	KN
11/06/14	KN

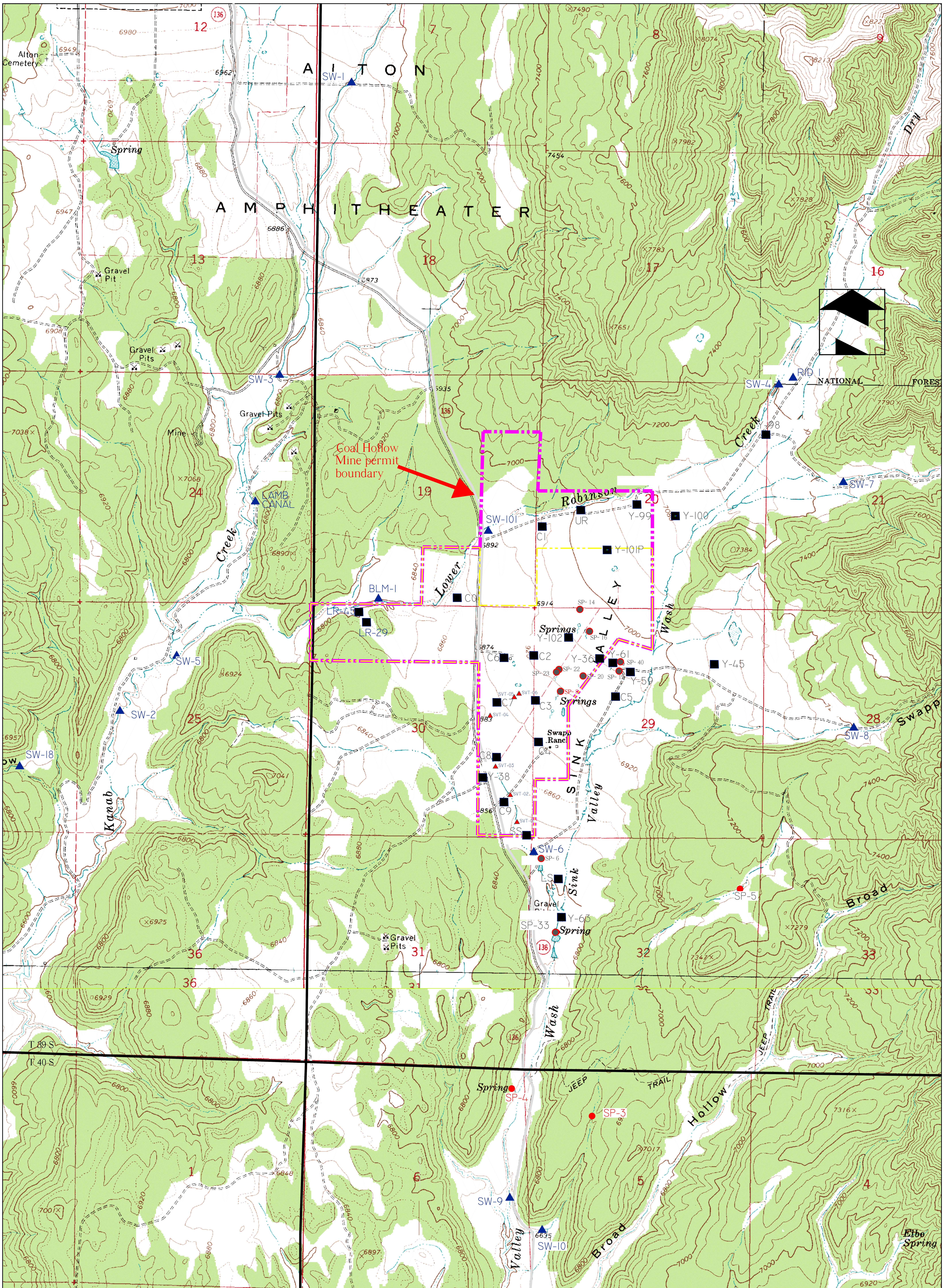
WELL LOCATIONS

COAL HOLLOW PROJECT
ALTON, UTAH

DRAWING: 7-12

5373615-2250
ERIK CARL PETERSEN
State of Utah

Alton Coal Development
Coal Hollow Project
463 North 100 West, Suite 1
Cedar City, Utah 84721
Phone (435)867-5331
Fax (435)867-1192



LEGEND:

- PERMIT BOUNDARY
- COAL LINE BOUNDARY
- COUNTY ROAD
- ▲ SVT ALLUVIAL TRENCH
- ● SP SPRING
- ▲ SW SURFACE WATER
- ■ Y MONITORING WELL

DRAWN BY:	CHECKED BY:
C. McCOURT	ECP
DRAWING:	DATE:
7–2	8/26/09
	SCALE:
	1" = 1000'
JOB NUMBER:	SHEET
1400	

REVISIONS

DATE:	BY:
10/23/13	KN
11/06/14	KN

BASELINE MONITORING LOCATIONS

COAL HOLLOW PROJECT
ALTON, UTAH

DRAWING: 7-2

ERIK CARL PETERSEN
5373615-2250

Alton Coal Development
Coal Hollow Project

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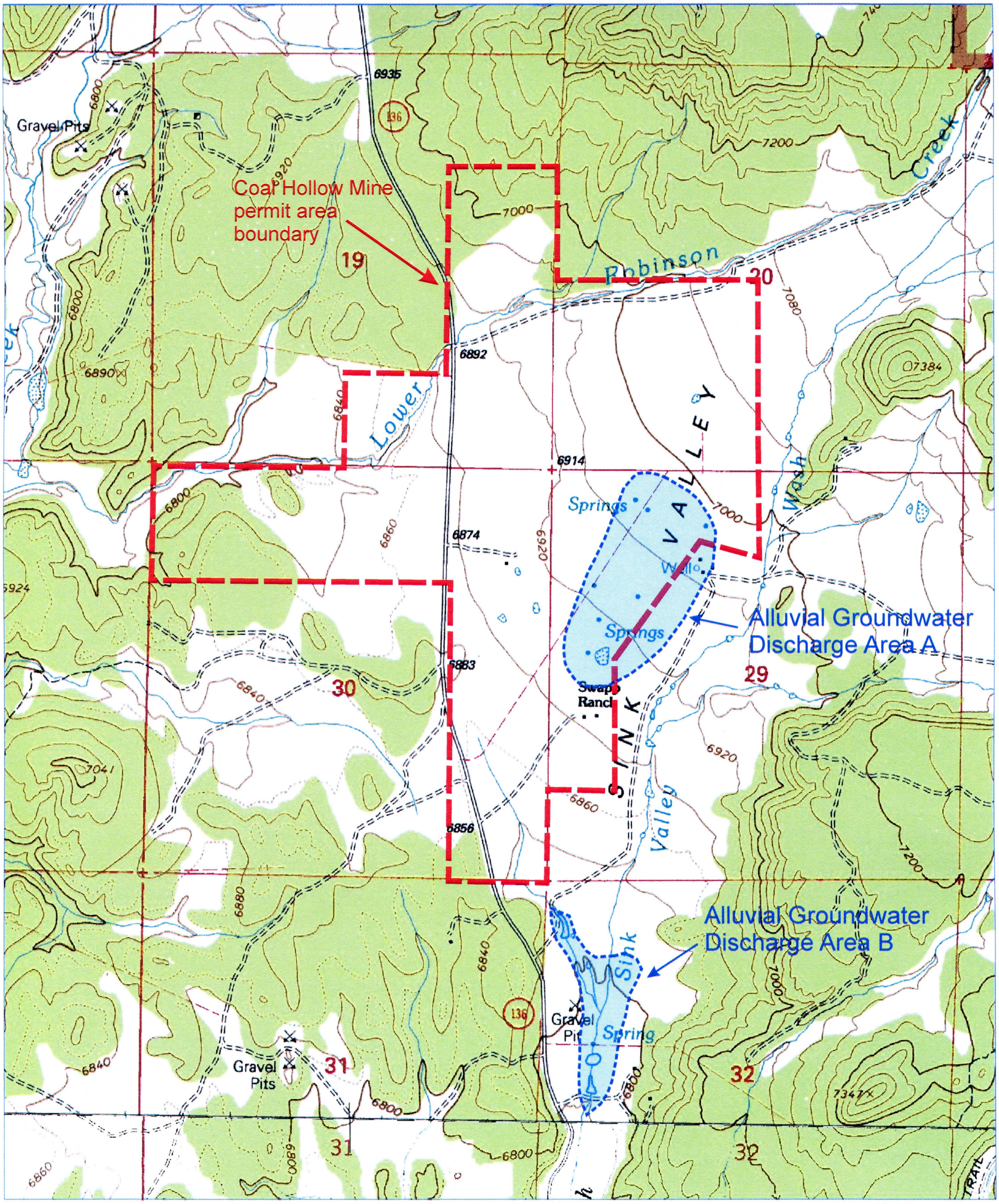
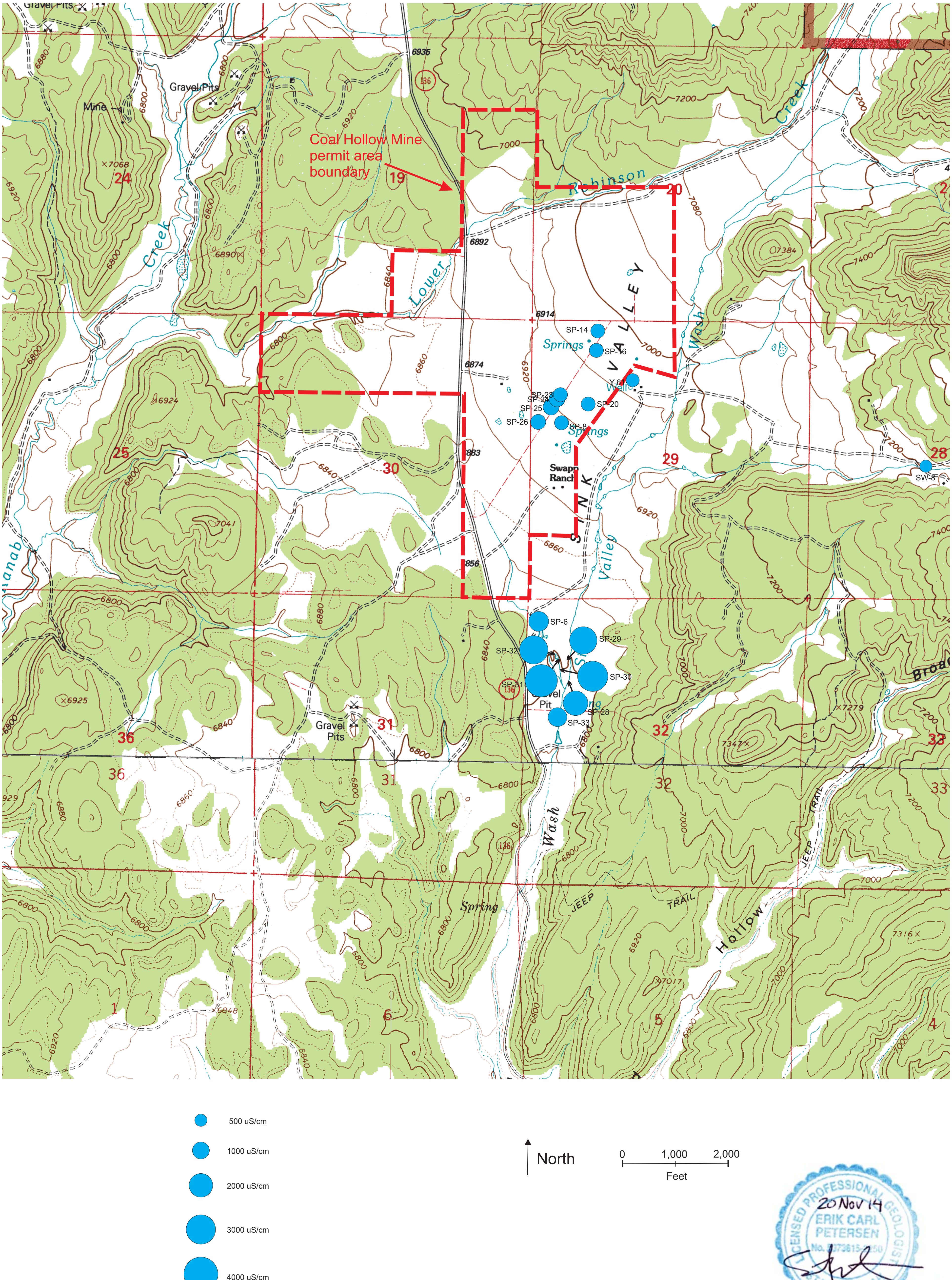


North

0 1,000 2,000 feet

Drawing 7-4 Alluvial groundwater discharge areas.

LICENSED PROFESSIONAL GEOLOGIST
20 Nov 14
ERIK CARL PETERSEN
STATE OF UTAH



Drawing 7-5 Map of specific conductance of alluvial groundwater in Sink Valley.

LICENSED PROFESSIONAL GEOLOGIST
20 NOV 14
ERIK CARL PETERSEN
STATE OF UTAH