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Technical Analysis and Findings

Utah Coal Regulatory Program

PID: **C0250005**
TaskID: **4505**
Mine Name: **COAL HOLLOW**
Title: **RESPONSE TO NOV #10135**

Summary

CONCLUSION AND RECOMMENDATION
All of the information submitted as part of Task ID # 4505 (1st submittal was TID 4444) has been submitted as a modification to the application titled IBC & HIGHWALL MINING ALTERNATIVE, Task ID # 4502.
Task ID # 4505, RESPONSE TO NOV # 10135 is recommended for conditional approval.

Deficiencies Details:

None

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Operation Plan

Mining Operations and Facilities

Analysis:

Type and Method of Mining Operations
Regulatory requirement R645-301-553 requires that in a coal stripping operation, backfilling and grading operations are required to follow coal recovery (from each pit/PHH) by no more than 60 days or 1,500 linear feet. Task ID # 4505 is requesting a variance to the requirements of -301-553 in order to implement another method of coal recovery (highwall mining). The submitted proposal states that coal recovery will be completed in the 4 panels off Pit 9 by July 25, 2014. This is based on the accuracy of the highwall miners delivery schedule, a two to three week assembly schedule, and the experience of ACD in the operation of this new mining method.
There are no changes proposed to the approved plan relative to AOC restoration, grading, soil placement, soil stabilization or re-vegetation of Pit 9. Only the timing of these activities is to be extended beyond the 60 day requirement to allow for the highwall coal recovery to occur off of the east side of Pit 9.

Task ID # 4505 contains Plate5-10B, which shows the layout for the coal recovery in the remainder of the permit area. Highwall mining will also be used to recover the reserves from Panels 1-20, which are shown to exist in the south end of the permit area. Overburden material and the coal reserves in Pits 26, 27, and 28 will be recovered using the dozer, shovel and off-highway trucks shown on Plate 5-10B. The Permittee has met the requirements for requesting a variance from

R645-301-553

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Coal Recovery

Analysis:

Analysis:
The Task ID # 4505 states in the cover letter that 306,000 tons of reserves will be recovered from the highwall mining of Pit 9, Panels 1-4 and Panels 1-20. It is assumed that the tonnage recovered from highwall face-up areas HWT-1 to HWT-5 is included in this tonnage.

Findings:
Task ID # 4505 meets the minimum regulatory requirements of R645-301-522.

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Road System Performance Standards

Analysis:

Where will the haul road out of pits HWT-1-5 to the surface facilities be developed / maintained ? What grade will be maintained on this road for the haul trucks ? This is a primary haul road and the requirements of location, and grade for the pit ingress / egress must be discussed .
This analysis was generated because the response generated to address N10135 did not address primary roads in the proposal to initiate highwall mining within the Coal Hollow Mine permit area, specifically the highwall trench areas HWT-1 to HWT-5. Dozers, trackhoes, front-end loaders and off-highwaytrucks will be used to remove the overburden and coal from HWT 1-5 in the currently approved coal strip mining method. Once the coal is removed from each trench and the area is readied for the highwall miner, that type of coal recovery will be initiated along the exposed highwall face. 10 ""faces"" will be driven between each set of barrier pillars.
The primary roads to haul the overburden and coal from the highwall trench areas will be located, surfaced and maintained according to the commitments contained in Volume 3, Chapter 5, section 534.300-340, Primary Roads, pages 5-52 and 5-53 in the Mining and Reclamation Plan approved / incorporated on October 15, 2009. This addresses the deficiency identified in the first few lines of this analysis.

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Reclamation Plan

Backfill and Grading General

Analysis:

Analysis:
Plate 10B shows the locations, length and widths of highwall trenches HWT-1 to HWT-5. Each trench appears to be about 500 feet long.
R645-302-245.400 and R645-301-553 require that backfilling and grading be kept current following completion of coal recovery from the trenches used to expose the highwall face-up areas. Backfilling and grading must be kept within 60 days or 1,500 linear feet of the completion of coal recovery activities.
Based on the requirement of 1,500 linear feet (-301-553), three trenches could be exposed before backfilling was initiated. The Permittee must submit a time line for the backfilling of HTW-1-5 highwall exposure trenches as the sensible need arises, backfilling the southern trenches as the more northern trenches need exposure.
Task ID # 4517, IBC and Highwall Mining Alternative, submitted March 4, 2014 contains a description of how and with what timing the backfilling and rough grading of HWT-1 through HWT-5 will be achieved, (See TID 4517, Chapter 5, pages 5-42 and 5-43). ""Once coal is removed from the southern panels of a Highwall Trench, overburden from the excavation from the next Highwall Trench is used to backfill the mined out area continuing with the progression of the trench."" This adequately addresses the concern identified above.

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