



# State of Utah

DEPARTMENT OF NATURAL RESOURCES

MICHAEL R. STYLER  
Executive Director

## Division of Oil, Gas and Mining

JOHN R. BAZA  
Division Director

# Inspection Report

Permit Number:	C0250005
Inspection Type:	PARTIAL
Inspection Date:	Tuesday, February 10, 2015
Start Date/Time:	2/10/2015 7:30:00 AM
End Date/Time:	2/10/2015 1:00:00 PM
Last Inspection:	Monday, January 12, 2015

Representatives Present During the Inspection:	
OGM	Priscilla Burton
OGM	Keenan Storrar
OGM	Cheryl Parker
Company	Kirk Nicholes

Inspector: Priscilla Burton,

Weather: sun 45F

InspectionID Report Number: 4101

Accepted by: JHELFRIC  
2/23/2015

Permittee: **ALTON COAL DEVELOPMENT LLC**  
 Operator: **ALTON COAL DEVELOPMENT LLC**  
 Site: **COAL HOLLOW**  
 Address: **463 North 100 West, Suite 1, CEDAR CITY UT 84720**  
 County: **KANE**  
 Permit Type: **PERMANENT COAL PROGRAM**  
 Permit Status: **ACTIVE**

### Current Acreages

721.00	<b>Total Permitted</b>
329.00	<b>Total Disturbed</b>
	<b>Phase I</b>
	<b>Phase II</b>
	<b>Phase III</b>

### Mineral Ownership

- Federal
- State
- County
- Fee
- Other

### Types of Operations

- Underground
- Surface
- Loadout
- Processing
- Reprocessing

### Report summary and status for pending enforcement actions, permit conditions, Division Orders, and amendments:

Twenty six panels were completed in Pit 9. The auer head was abandoned in the highwall of Pit 9 . Pit 9 panels have been backfilled. Thirteen panels were completed in Pit 21. Pit 21 is partially backfilled. Pit 22 is backfilled. Sixteen panels have been completed in HWT 1. Approximately 500 ft of coal face is exposed in HWT 1. Coal production was at a standstill while High Wall Trench 1 is being advanced. A trackhoe was loading trucks with spoil from the HWT 1 face. The trucks were backing up a short distance to place the spoil in Pit 9. Two D11 dozers were pushing the spoils pile adjacent to pit 10 into the combined pits 9 and 10. A trackhoe was facing up the Pit 10 highwall. Division staff members reviewing the phase I bond release application were present during the inspection. We observed the reclamation status of the phase I bond release areas as shown on Figure 1 of the application. Using an ipad with the Collector App, we walked the boundary of the Phase I bond release areas and the reconstructed channel of Robinson Creek.

Inspector's Signature:

Priscilla Burton,  
Inspector ID Number: 37

Digitally signed by Priscilla Burton  
DN: cn=Priscilla Burton, o, ou,  
email=priscillaburton@utah.gov, c=US  
Date: 2015.02.23 16:44:52 -07'00'

Date Wednesday, February 10, 2015



**REVIEW OF PERMIT, PERFORMANCE STANDARDS PERMIT CONDITION REQUIREMENTS**

1. Substantiate the elements on this inspection by checking the appropriate performance standard.
  - a. For COMPLETE inspections provide narrative justification for any elements not fully inspected unless element is not appropriate to the site, in which case check Not Applicable.
  - b. For PARTIAL inspections check only the elements evaluated.
2. Document any noncompliance situation by reference the NOV issued at the appropriate performance standard listed below.
3. Reference any narratives written in conjunction with this inspection at the appropriate performance standard listed below.
4. Provide a brief status report for all pending enforcement actions, permit conditions, Divison Orders, and amendments.

	Evaluated	Not Applicable	Comment	Enforcement
1. Permits, Change, Transfer, Renewal, Sale	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Signs and Markers	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Topsoil	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4.a Hydrologic Balance: Diversions	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4.b Hydrologic Balance: Sediment Ponds and Impoundments	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4.c Hydrologic Balance: Other Sediment Control Measures	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4.d Hydrologic Balance: Water Monitoring	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.e Hydrologic Balance: Effluent Limitations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Explosives	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. Disposal of Excess Spoil, Fills, Benches	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. Coal Mine Waste, Refuse Piles, Impoundments	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. Noncoal Waste	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. Protection of Fish, Wildlife and Related Environmental Issues	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10. Slides and Other Damage	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11. Contemporaneous Reclamation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
12. Backfilling And Grading	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
13. Revegetation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
14. Subsidence Control	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
15. Cessation of Operations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
16.a Roads: Construction, Maintenance, Surfacing	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
16.b Roads: Drainage Controls	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
17. Other Transportation Facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
18. Support Facilities, Utility Installations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
19. AVS Check	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
20. Air Quality Permit	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
21. Bonding and Insurance	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
22. Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**1. Permits, Change, Transfer, Renewal, Sale**

Phase I bond release for approximately 79 acres within Phase 1 and Phase 2 bonded areas is currently under review, Task 4788. Figure 1 of the application shows the location of the approximately 79 acres included in the bond release application. This same figure is included in the public notice which was printed in the Southern Utah News Feb 5, 2015. Mr Nichols agreed to stake the boundary of the phase 1 bond release areas, prior to the bond release inspection date, Tuesday, March 3, 2015.

**2. Signs and Markers**

Topsoil and subsoil markers were in place on topsoil pile #2 , topsoil pile #4, and subsoil pile #2.

**3. Topsoil**

Last week two scrapers worked Topsoil pile 4 to move approximately one third to one-half of the pile down to the Pit 22 area. Further reclamation in 2015 will use the remaining portion of Topsoil pile #4. Topsoil application depths are defined as an average of 8 inches. Topsoil application depths were not checked during this site visit.

#### **4.a Hydrologic Balance: Diversions**

Culvert #11 has been extended upstream and angled so as to create a better flow through the culvert. To reduce the amount of sediment entering this culvert, the area disturbed by this recent culvert work will be roughened and seeded when the soils dry out.

UD #1 was flowing, see photograph.

Ditch 4 has been installed in the wrong location along the eastern boundary of the Lower Robinson Creek reconstruction. Also, the elevation of the bottom of the ditch was measured along the ditch length using a GPS. There are low points in the ditch that will not allow runoff to be properly routed to Sediment Pond 3.

The outlet of the reconstructed Lower Robinson Creek needs significant work to finish the reconstruction. The Permittee is planning to submit a PE certified amendment for the construction of this outlet.

The Permittee plans to install ditches along the northern end of the reconstructed county road. This work is needed immediately to protect the recently topsoiled and reclaimed Pit 5 area.

Sediment is partially plugging the disturbed side of Ditch 1 near Sediment Pond 4. The Permittee was advised to clean this plug so the ditch may properly drain.

The newly constructed length of Ditch 4 along the eastern rim of Lower Robinson Creek reconstruction was inspected. We walked in the bottom of the ditch with a GPS held at a constant height and measured the elevation of the ditch along its length. A longitudinal profile of the ditch on page 6 shows a 6 ft hydrologic dip over a ~270 ft length of the ditch. The current construction of the ditch means ~20 acres of disturbance are treated by a single straw bale check dam at the lower end of the Lower Robinson Creek reconstruction before exiting the permit area. The Division hydrologist, Keenan, emailed the profile to Kirk and spoke with him over the phone about the current construction of the ditch on February 18, 2015 at 11:30 am. In the conversation, Kirk was asked to submit a surveyed longitudinal profile of the bottom elevation of the ditch along this newly reconstructed section. The ditch will be reinspected upon receipt of the longitudinal profile and during the bond release site visit planned for early March.

#### **4.b Hydrologic Balance: Sediment Ponds and Impoundments**

Water was being pumped from sediment pond #2 to water the county road.

#### **4.c Hydrologic Balance: Other Sediment Control Measures**

The berm in the repair yard was recently built up. The loose berm will be compacted and dressed up.

The loose soil piled high on the sides of Ditch 4 in the vicinity of the Lower Robinson Creek outlet needs dressing up.

The straw bale check dam at the lower end of the reconstructed Robinson Creek has gaps in the joints between abutting straw bales and between the structure and stream bank on its northern end. The Permittee was notified to fill these gaps in order for the structure to function properly.

The straw wattles between the southwestern corner of watershed 6 and the Robinson creek diversion need to be re-staked in place.

#### **9. Protection of Fish, Wildlife and Related Environmental Issues**

Flushed a sage hen out of the Pond #2 area.

#### **12. Backfilling And Grading**

Two wet areas on either side of the Dame property entrance will be graded when they dry out and the spoil placed on the entrance road will be removed.

A low spot was noted in the center of the reconstructed Robinson Creek. The low spot was confirmed by visual evidence: salt deposits on the surface. The low spot was approximately 130 ft long. The grade of the reconstruction should be rechecked. No further topsoil should be applied to the channel bottom as topsoil is likely to be swept away from this location. If further reconstruction efforts allow, the topsoil could be recovered from this location and applied to an adjacent area.

#### **13. Revegetation**

Topsoil, nutrimulch and seed has been applied to reclaimed areas just west of the Dame property entrance. These areas are north of the Phase I bond release locations. These areas were extremely compacted. The topsoil was applied in this location with scrapers. We could dig only about six inches into the surface with a shovel. Marks on the compacted surface were evidence that a discer was used to seed the surface, but it is doubtful that the seed was placed at the proper depth due to the compaction. This area will be watched for germination success.

#### **16.a Roads: Construction, Maintenance, Surfacing**

A berm or ditch is immediately required along the road just west of Pond #2 to prevent water draining from this area and creating rills in the recently topsoiled and seeded surface above Pit 5.

The berm along the undisturbed side of the east boundary road should be made much more prominent.



Panorama: Phase 1 area: Pit 9 is on the left. A hoe is facing up the Pit 10 highwall on the right. Dozers push the spoil pile in the center of the photo. Topsoil pile #4 is directly above pit #10. Subsoil Pile #2 is directly behind the topsoil pile.



A trackhoe loads a haul truck with recently blasted rock in the onsouth end of HWT1. Auger panel extensions are stacked in front of backfilled panels in HWT 1. A haul truck loaded with spoil backs up to dump in pit #9. At far right, a dozer is ready to grade the dumped spoil.



Pit 21 partially backfilled.



A berm is needed to stop the water flow from the operations area (left) from the Pit 5 area (right) included in bond release.



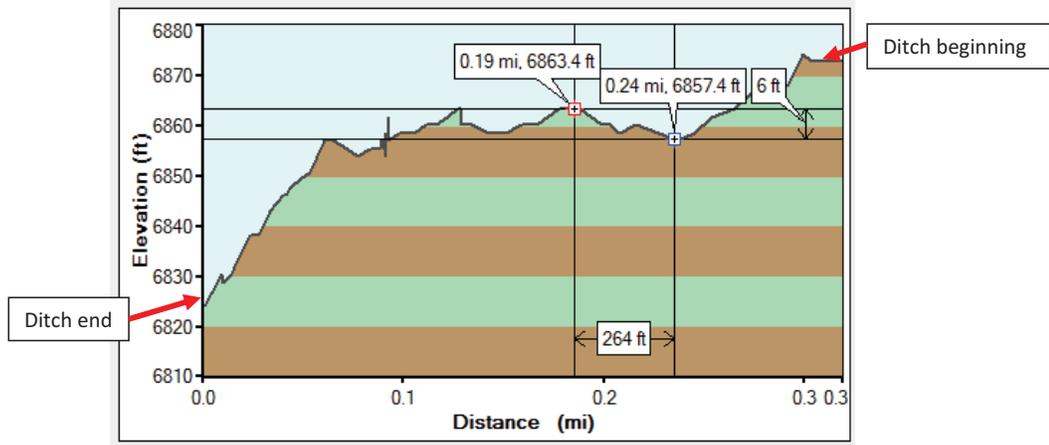
Phase 2 area (pits 28 - 25) included in bond release.



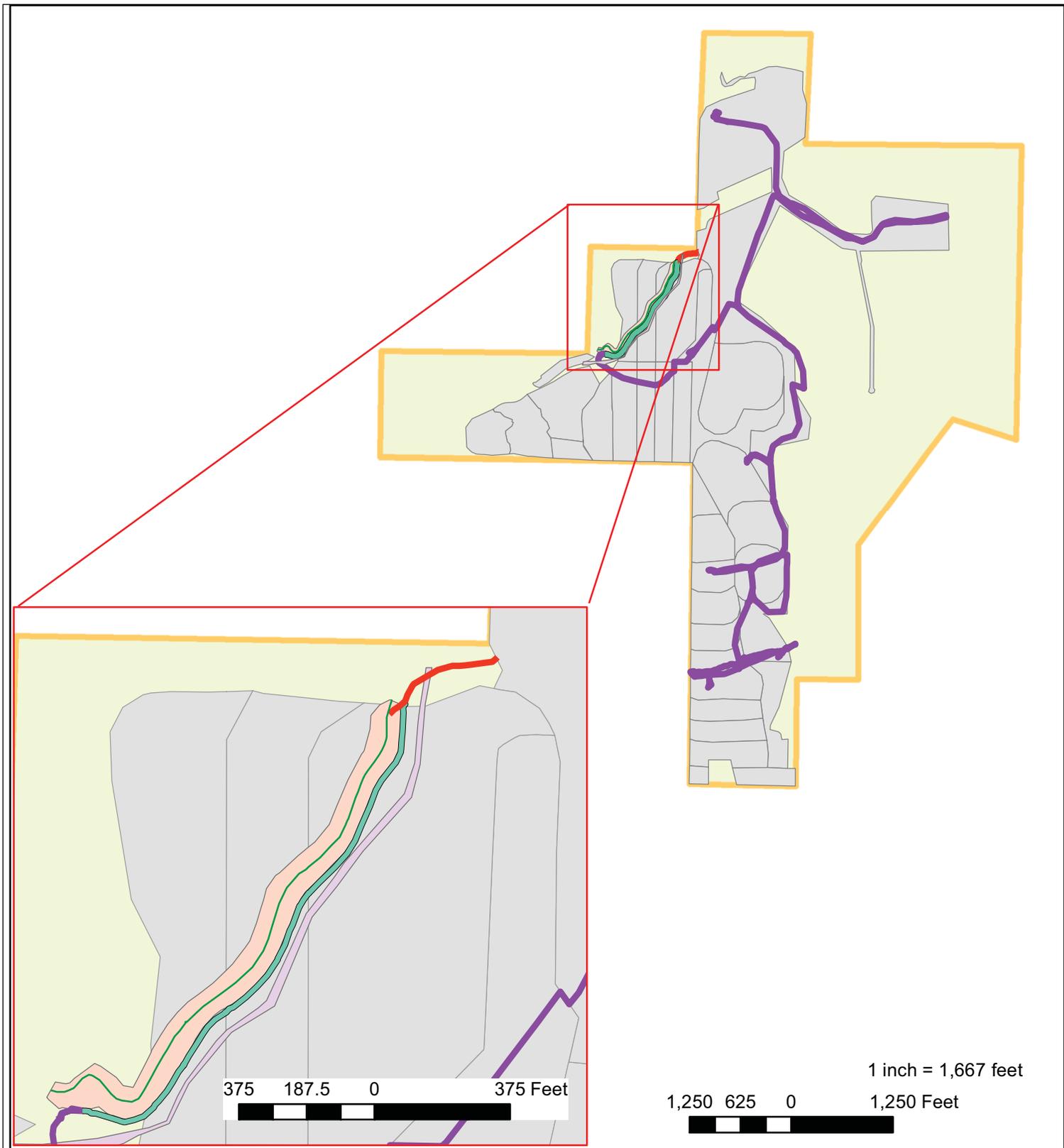
Water flowing in Ditch 1.



Looking South at Ditch #4 near its beginning.



A longitudinal profile of Ditch 4 shows the ditch is not graded to properly drain water along its length. The maximum depth of the ditch is ~1 ft, therefore runoff within the ditch will not be able to flow over the 6 ft hydrologic “hump” highlighted in this cross-section.



**Legend**

- Robinson Creek Reconstruction Base
- MRP Ditch 4 Location
- Newly Constructed Ditch 4
- Drainage Rills
- Inspection Paths Travelled
- Robinson Creek Reconstruction footprint
- Mining Area
- Permit Area

**NOTES:**  
 Data collected by Garmin etrex 20 Handheld GPS and Samsung tablet utilizing ArcCollector.  
 GPS tracked marks are approximate and not survey grade accuracy required to determine true locations. A survey must be requested to ground truth any of the GPS tracks.

Inspection Report 4101  
 Created: 2/20/2015  
 Cheryl Parker, M.S., P.E.

**Coal Hollow Project  
 Alton Coal Development**

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**February Partial Inspection  
 02/09//2015**

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**Utah DNR  
 DOGM**

