

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:	Wednesday, May 13, 2015
Start Date/Time:	5/13/2015 9:00:00 AM
End Date/Time:	5/13/2015 2:30:00 PM
Last Inspection:	Wednesday, April 29, 2015

Representatives Present During the Inspection:	
OGM	Priscilla Burton
Company	Kirk Nicholes

Inspector: Priscilla Burton,

Weather: overcast 50F

InspectionID Report Number: 4192

Accepted by: JHELFRIC

5/21/2015

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	Total Permitted
342.00	Total Disturbed
	Phase I
	Phase II
	Phase III

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:

HWT 1 was backfilled above the coal. The haul road/entrance to the HWT 2 face was approximately 1,000 ft. long beginning in HWT 1. Mining activity was focused on construction and extension of HWT 2 where a blast was recently conducted and the overburden had been removed. (See the attached mining progress figure.) The alluvium above this section of HWT2 was being shaped to a 4h:1v slope. The coal in a 200 ft square block was being removed by an excavator and loaded onto haul trucks. This is the first coal to be loaded in a week. Mining activity also focused on construction and face-up of 3 portals in the UG Mine. Four coal haul trucks were running all day hauling gravel and cobbles from a gravel pit south of the mine on the County road to the UG mine/Pit 10 haul road. There was no backfilling occurring.

Inspector's Signature: **Priscilla Burton**

Priscilla Burton,
Inspector ID Number: 37

Digitally signed by Priscilla Burton
 DN: cn=Priscilla Burton, o, ou,
 email=priscillaburton@utah.gov, c=US
 Date: 2015.06.04 16:50:07 -06'00'

Date Thursday, May 14, 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 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6. Disposal of Excess Spoil, Fills, Benches	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10. Slides and Other Damage	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
13. Revegetation	<input type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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

Air Quality approval order was issued April 21, 2015 for the underground mine. The underground mine has been named the Burton #1 mine, named after Burton Pugh, the landowner. Foremen: Clark Atwood, Larry Johnson, and Adrian Childs.

Kirk stated that pond as-builts for ponds 1, 1B, 2 and 3 had been submitted in 2011. Pond as-builts were found in the Division files, received 7/25/2011, but they did not supercede the plan drawings. Pond as-built drawings for ponds 1B and 2 should be re-submitted and accompanied by a C1C2 form for amendment to the MRP. The plan was already amended with the Pond #3 as built and the Pond #1 design is currently under review.

The locations of the ditches and culverts directing water to the Pit 10 sump will be shown on an asbuilt Dwg to replace existing Dwg 5-3B, Underground Facilities and Structures Layout. Underground mining equipment is being stored adjacent to Subsoil Pile #2 and Dwg 5-3 must be updated accordingly.

The berm constructed to prevent material entering Lower Robinson Creek from the repair yard must be shown on an updated Dwg 5-3 and 5-3A.

3. Topsoil

The remaining topsoil in topsoil pile #4 is scheduled to be used in reclamation of the former excess spoils pile and remaining southern pits. Subsoil pile #2 will also be utilized for that reclamation. Together these piles hold approximately 300,000 CY. If the piles are not fully utilized they must be treated as described in the MRP Section 231.100. we discussed the use of a polyacrylamide (PAM) for this purpose. A thorough discussion of the uses of PAM is provided in, Sojka, R.E. et al. 2007. Polyacrylamide in Agriculture and Environmental Land Management. Vol. 92. Advances in Agronomy. A link to the publication will be sent with this inspection report.

4.a Hydrologic Balance: Diversions

Culvert #6 was repaired and functional. No water was running in the culvert. The broken valve in the coal storage yard was repaired. No water was entering pond #1.

DD#4 was under construction using a bobcat excavator. The ditch measured 5 ft wide with 2h:1v side slopes. The "borrow" from the ditch was being placed on the uphill side of the ditch (that is the side near Robinson Creek). When it comes time to reclaim, the ditch will be filled in with this soil. Designs for DD #4 are found in Dwg 5-34. Seed was on hand to seed the new ditch DD#4 and to seed the location of the old ditch, that has now been filled in.

Water collecting in pit #10 has been directed to a sump where it can be pumped up and into water trucks on the highwall bench access road. There were three culverts installed to send water from the surrounding highwall/fill to a sump. A pipe leads from the sump, up to the bench above the highwall. There was a pump installed in the sump. There was no pumping going on at the time of the inspection. (Neither the sump, culverts or berms are shown on Dwg 5-3B. However, pumping from the sump to Pond #3 is under discussion with the Division hydrologist. The locations of the sump and ditches and culverts directing water to the sump will be shown on as asbuilt Dwg to replace existing Dwg 5-3B Underground Facilities and Structures Layout.)

4.b Hydrologic Balance: Sediment Ponds and Impoundments

Pond #1 coal fines were cleaned up and placed on the pond embankment and will be removed when they are dry. Pond #1 and Pond #2 water levels have been drawn down. Pond #1 is portrayed in Dwg 5-28. New pond #1 designs are under review as Task 4894. Pond 1B is Dwg 5-28B. Pond #2 is portrayed in Dwg 5-29. Kirk stated that pond as-builts had been submitted in 2011. Pond as-builts were found in the Division files, received 7/25/2011, but they did not supercede the plan drawings. Pond as-built drawings should be re-submitted and accompanied by a C1C2 form for amendment to the MRP.

A water truck was filling from Pond #3. This water will be used within the permit boundary for dust control. A delta of sediment exists where DD 4 empties into Pond #3. Consequently, clean out and maintenance of the inlet are scheduled this summer. Using geotextile beneath rip rap was discussed as a possible solution to the erosion problem in this area. Ditch 4 design is shown on Dwg 5-34. Pond #3 design is shown on Dwg 5-30.

Erosion of the pond #3 dam embankment was noticed and should be evaluated by the Professional Engineer during the next quarterly inspection of the ponds. Tamarisk growing on the dam embankment must be removed this growing season.

There was no work being done to abate violation 16150 (pond 4 and UD 1 grading). Kirk is waiting on a mini-track excavator expected to be delivered tomorrow.

4.c Hydrologic Balance: Other Sediment Control Measures

Excelsior logs at the base of the Excess Spoil pile (south side) need to be extended along the length of the pile.

Large berms have been constructed around the underground facilities to protect men and materials from sloughing coming down from the south pit fill wall. These MSHA berms will be included on an as-built drawing 5-3B.

5. Explosives

A blast was conducted in HWT2 on May 3 to advance the trench 200 ft.

6. Disposal of Excess Spoil, Fills, Benches

There was approximately 100,000 CY of formerly excess, now temporary, spoil remaining to be removed and used as fill in pits and trenches. There was one dozer ripping the temporary spoils, but no excavator was present to load trucks. There were no trucks hauling backfill.

The gully on the south side of the Excess Spoils pile was filled with pinyon tree branches. It is hoped that the branches will trap sediment and fill in the gully. This repair approach does not meet the requirements of R645-301-244.320. The Division staff will be asked to evaluate this approach and determine whether it will suffice, further work may be required. This location will be closely monitored for compliance with R645-301-746.221 and R645-301-762.100.

10. Slides and Other Damage

The chain link face up above the portals extends 15 - 20 feet beyond the portals, but beyond that, the highwall is unstable. There was a large berm at the base of the highwall to protect men and equipment from highwall failure. The 2h:1v slope constructed on fill to the south has failed. The area has been blocked off by a large berm. A representative from MSHA was onsite and has approved this arrangement.

16.a Roads: Construction, Maintenance, Surfacing

18. Support Facilities, Utility Installations

Underground mining equipment is being stored adjacent to Subsoil Pile #2. Dwg 5-3 must be updated accordingly.

May Holes

Pit 9 Panel 1

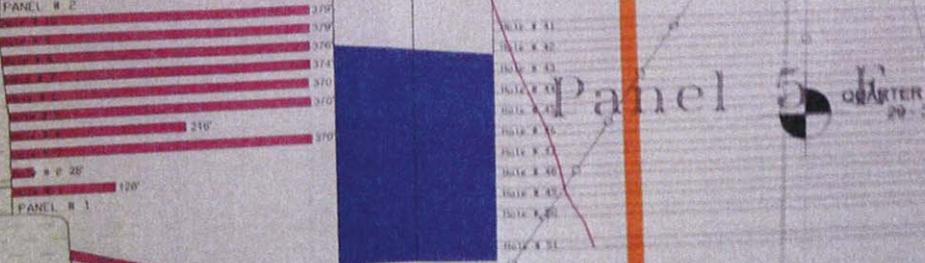
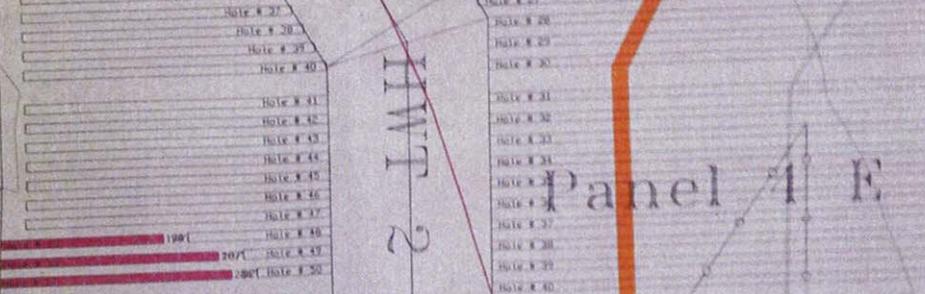
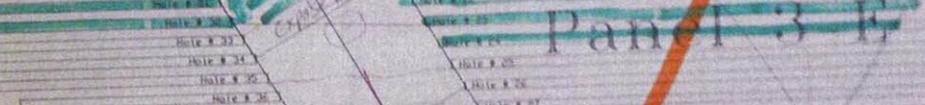
Panel 1 E

Panel 2 E

Panel 3 E

Panel 4 E

Panel 5 E



1/16TH CORNER 30

QUARTER CORNER 20-30

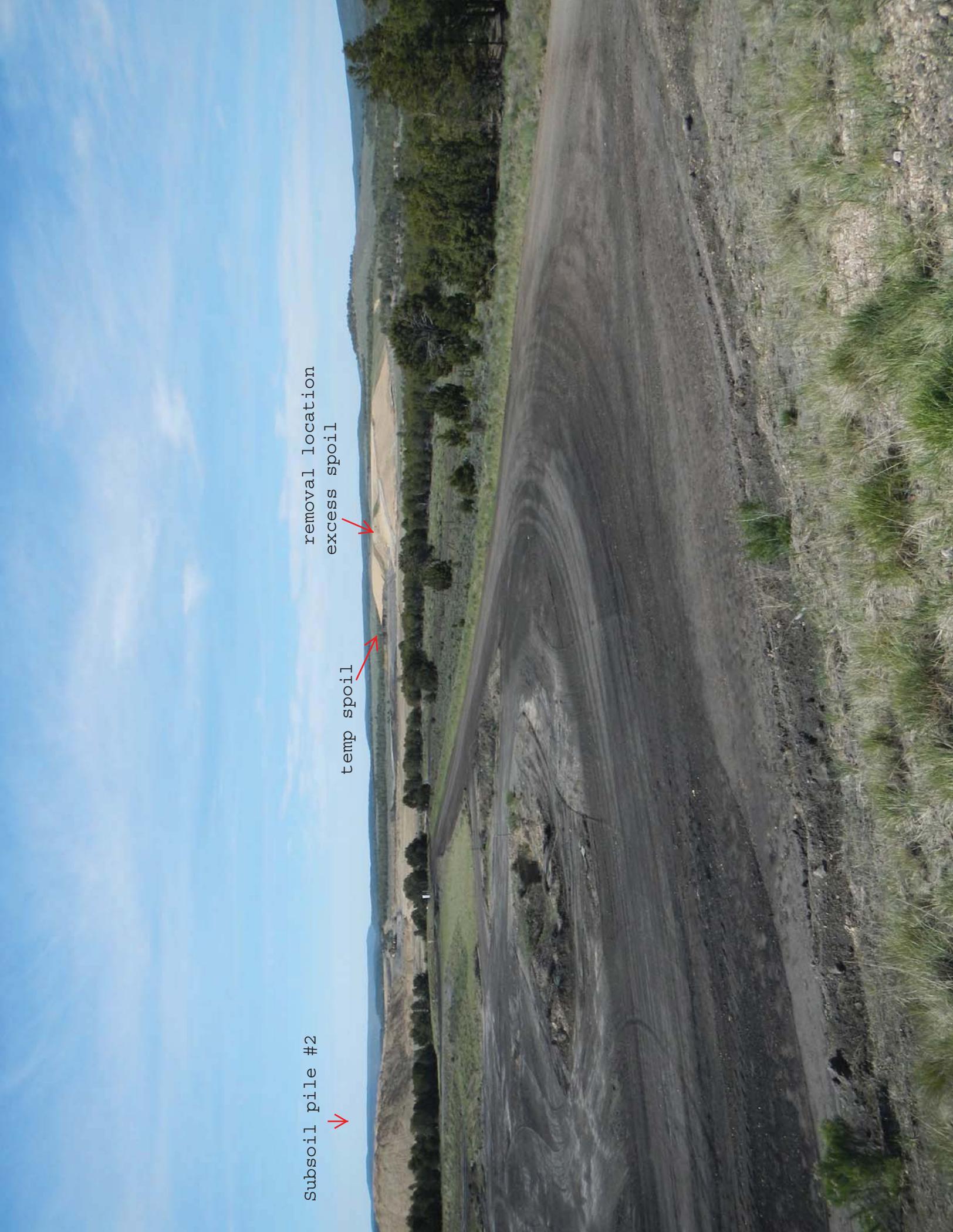
Subsoil pile #2



removal location
excess spoil



temp spoil



EAST

WEST

excess spoil removed east of this green topsoil strip

temporary spoil pile

DD 4



