



GARY R. HERBERT
Governor

GREG BELL
Lieutenant Governor

State of Utah

DEPARTMENT OF NATURAL RESOURCES

MICHAEL R. STYLER
Executive Director

Division of Oil, Gas and Mining

JOHN R. BAZA
Division Director

Inspection Report

Permit Number:	C0250005
Inspection Type:	PARTIAL
Inspection Date:	Monday, July 13, 2015
Start Date/Time:	7/13/2015 9:00:00 AM
End Date/Time:	7/13/2015 3:00:00 PM
Last Inspection:	Friday, July 10, 2015

Inspector: Priscilla Burton,

Weather: sun 75 F

InspectionID Report Number: 5246

Accepted by:

Representatives Present During the Inspection:	
Company	Joe Kumpke
Company	Drew Christensen
OGM	Priscilla Burton
Company	Kirk Nicholes

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:

The inspection began at the mine site in the morning and continued at the Cedar City office in the afternoon. Reclamation of HWT1 was progressing using excess spoil. Subsoil was being pushed off the crest of the excess spoil pile. Subsoil is stockpiled loosely at the toe of the excess spoil pile. Mining has ceased in HWT2. Four panels need to be backfilled prior to HWT 2 being backfilled. Water is cascading from the alluvium has ponded in front of these panels in HWT2. Topsoil was removed alongside reconstructed Robinson Creek to facilitate placement of rock in the reconstructed channel this week. Disturbed area boundary signs will be placed and the berm reformed on the access road east of Pit 10. Four cows were being rounded up from the site after a landowner left the gate open. Work was completed on the ASCA at the entrance.

See Dwg 5-3 for surface facilities and Dwg 5-10 for HWT and pit locations. For location of the final auger panel refer to the attached figure.

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: 2015.07.30 12:25:15 -06'00'

Date

Monday, July 20, 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 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
11. Contemporaneous Reclamation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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

Stream Alteration permit 15-85-02SA for the reconstruction of Robinson Creek was approved on June 16, 2015. Placement of rock will begin later this week.

Division Order response is under review as Task 4796.

Annual report is under review as Task 4859.

Renewal of Alton Coal Development (ACD) Coal Hollow Permit C/025/0005 is under review as task 4948.

Pond #1 and water tank revisions have been combined with the Pipeline from Pit 10 to Sed Pond 3 amendment and both are under review as Task 4951. The information provided under this task includes a revised Dwg 5-3 showing storage yards as requested.

The North Private Lease is under review as Task 4942.

Work was completed to abate NOV 20153 issued 7/7/2015 for failure to maintain the Alternate Sediment Control Area (ASCA) at the mine entrance .

NOV 21154 was issued and terminated on 7/16/2015 for failure to conduct vegetation monitoring.

2. Signs and Markers

Topsoil signs are located at the long berm of the stockpiles. Topsoil and subsoil signs are necessary for the recently removed topsoil and subsoil stockpiled at the base of the Excess Spoil pile.

Markers will be placed along the edge of the disturbed area east of Pit 10 this week.

3. Topsoil

We discussed topsoil volumes reported in the annual report. The report states that topsoil stockpile #4 holds 51,234 CY of soil. Material from topsoil #4 was used for reclamation in late 2014 and early 2015. A recent survey shows that topsoil pile #4 now holds approximately 18,000 CY.

Topsoil pile #5 was consumed in late 2014, it held 8,671 CY.

Noxious weed species, musk, bull and canada thistle, must be controlled on topsoil pile #1. (There are several species of thistle on the pile, not all of which are noxious.) Mechanical control applied now would be sufficient to stop the spread of thistle on this stockpile. Blossoms should be bagged and the plants dug up. Plants with blossoms removed can be left on the pile.

Topsoil was removed from the excess spoil pile access road recently. This topsoil was covered with cheat grass. This topsoil was either placed in the topsoil pile #4 or live hauled to the surface of Pits 22 & 23. It's possible that this movement will bury the seed deeper than three inches and prevent emergence. Confirmation of the location where this topsoil was placed was requested, so the site can be watched carefully.

Subsoil is being removed from the crest of the reclaimed excess spoil pile in advance of spoil removal. The subsoil removed from the excess spoil pile is being stockpiled at the base of the excess spoil pile. The stockpiles must be protected with a berm or other sediment control measure and signed. An accounting of the topsoil and subsoil removed from the excess spoil pile was requested.

Topsoil was scraped into a long berm along the east side of DD4 to allow for passage of truckloads of rock during placement of riprap along the length of the Robinson Creek channel this week. The subsoil will be ripped prior to topsoil replacement.

4.a Hydrologic Balance: Diversions

The ditch from the water tank to C7 was cleaned out. The disturbed ground was seeded.

Ditch DD 4 was routed away from Robinson Creek. The ditch was fairly dry.

4.b Hydrologic Balance: Sediment Ponds and Impoundments

Quarterly pond inspections were completed on June 24, 2015. Water in all ponds was very low. Cobble size riprap was placed in the inlet to Pond #1 and Pond #3. This riprap does not meet the D50 requirement of six inches. When the Pond #1 and Pond #3 amendments are approved, the riprap placed in the inlet must meet with the requirements of the approved design. Dried sludge was removed from the embankment of pond #1. The disturbed area was seeded.

4.c Hydrologic Balance: Other Sediment Control Measures

The water truck was pumping from Pond #3.

5. Explosives

No blasting has occurred since June 12, 2015.

6. Disposal of Excess Spoil, Fills, Benches

A professional engineer's inspection of the excess spoil pile was completed on June 24, 2015. At that time, the total pile capacity was reported to be 8,600,000 CY and the remaining capacity was reported to be 5,755,000 CY. By difference, there was 2,245,000 CY of spoil in the excess spoil pile on June 24, 2015. Since that time, the Excess spoils pile has been used to fill HWT 1 and HWT2 and so the volume in the pile at present is uncertain. ACD will need to provide the volumes of spoil used to reclaim those areas.

The Division's expectation of an amendment on or before July 21 detailing the repair of the gully on the south side of the excess spoil pile was discussed. ACD staff suggested that when all the required spoil is removed, there will no longer be a gully. Still, ACD was advised to provide the Division with the details of this in written form before July 21.

8. Noncoal Waste

Trash is blowing into a ravine NW of the office trailer. This trash should be picked up and placed in a container prior to the next inspection.

9. Protection of Fish, Wildlife and Related Environmental Issues

Just recently, four cows wandered in to the reclaimed area when the gate was left open by a contractor hired by a landowner. The grazing permittee (MacElprang) was rounding them up.

Tamarisk in standing water of Pond 3 will be removed when the level of Pond 3 is reduced and the plants are within reach of men and equipment (in the next couple of weeks).

10. Slides and Other Damage

Alluvium laid back above HWT 2 on the east side is unstable and sloughing. Six streams of water could be seen flowing in gullies from the alluvium at its interface with the shale overburden. The water is flowing into the pit. One gully stream was red with oxidized metals. The flow of water was difficult to determine at a distance, but an estimate of 10 gpm at one gully was discussed as likely. MRP Table 7-9 Estimated Rates of Groundwater Inflows projects 1.7 gpm to 6 gpm per 100 linear feet inflow for areas C3 and C4. (Refer to Dwg 7 - 10 for well locations.)

Supplemental monitoring of springs and wells is required in conjunction with the highwall mining (MRP Vol 7, Chap 7, page 7-60). The most recent monitoring report on file with the Division is dated January 7, 2015. Reporting of monitoring data in conjunction with the highwall mining is long overdue and should be provided to the Division immediately.

11. Contemporaneous Reclamation

Topsoil had just been placed over reclaimed pits 22 and 23. This area is approximately 5 acres. This area requires straw/hay mulch, nutrimulch, and seed to be applied promptly otherwise the soil will require tilling.

Area above Pits 22 and 23 that are subsoiled, but not yet topsoiled require ripping prior to topsoil placement as the subsoil surface has been compacted and equipment ruts are visible.

The graded area east of the Pit 10 access road also requires seeding.

A small area near pond 4 was too muddy to topsoil and it also will require ripping prior to topsoil placement.

Topsoil testing of all areas reclaimed in 2014 was not included the annual report and is overdue. This testing has not been completed. I stated that this testing could be accomplished now and advised ACD to complete the required testing now.

12. Backfilling And Grading

HWT 1 & 2 were being backfilled. Water is ponding in the bottom of HWT 2. Mining has ceased in HWT 2. The location of the last auger panels is shown on the attached figure provided by Joe K. The last four auger panels need to be backfilled immediately.

13. Revegetation

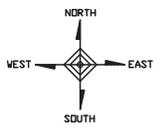
Cheat grass covers a large area on the west facing side of the Excess Spoils pile adjacent to the road to Pond #3 and on the north side of DD#4. This cheat grass has already gone to seed. It must be controlled. Herbicide treatment in the fall is recommended. The area should be reseeded with desirable species. The site should be watched carefully for cheat grass emergence in the spring. The USDA has prepared a Field Guide for Managing Cheatgrass in the Southwest which details control strategies. It will be sent along with this inspection report. It can also be found at the following link

http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5410110.pdf

16.a Roads: Construction, Maintenance, Surfacing

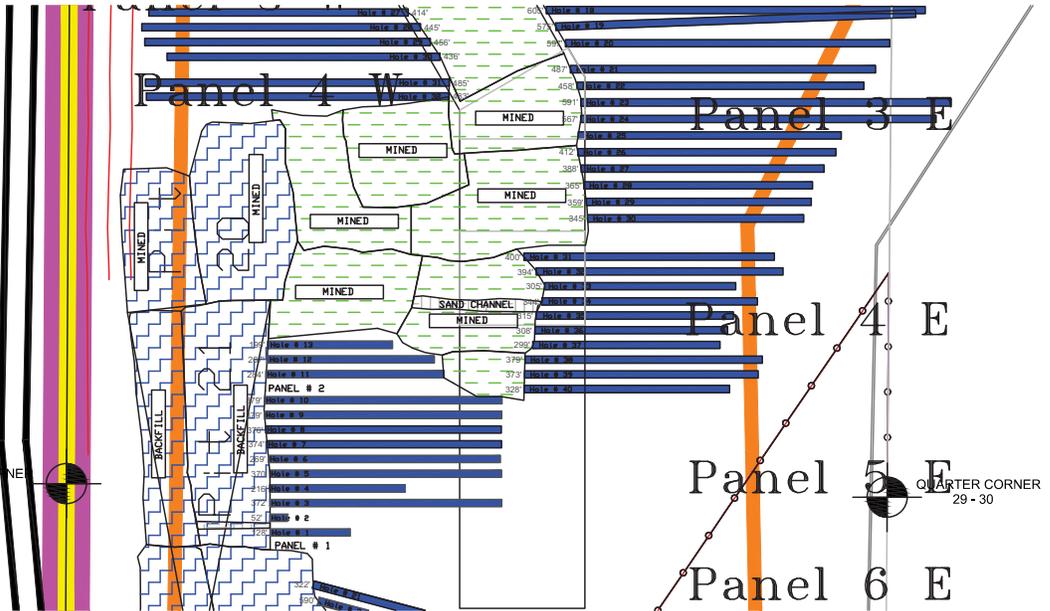
The access road east of pit 10 will be segregated from the larger disturbed area with a berm on the east side.

07-13-15



-  PICTURE TAKEN
-  EXPOSED COAL
-  MINED
-  BACKFILLED
-  PARTIAL UNCOVERED

1/16TH CORNER
30





Looking north at the North lease fee area as seen from the existing County Road.



Facilities yard viewed from topsoil pile #1.



Looking east at the last auger entries in panel 4, HWT2, and the unstable alluvium along the highwall. Water is ponded in the pit. Arrows point to locations where gullies formed while carrying flow from the alluvium into the pit. Water could be seen flowing in several locations.



Looking west at Pit 10 and the Burton #1 Mine.
The excess spoils pile is in the background.



Above and Below: Mine entrance ASCA culvert cleared (abatement to NOV 20153).





Above and Below: Water Tank and ditch leading to C7 cleared and seeded.





Above and Below: Inlet to Pond #1 riprapped with cobbles and area disturbed by sludge placement was seeded.





Above: Topsoil was removed from west side of the reconstructed Robinson Creek to allow truck travel for riprap placement in the channel.



Above: topsoil stockpiled along length of eastern side of DD#4



Above: A gully at the north end of the reconstructed Robinson Creek will be repaired during the reconstruction work.



Above: Water is being lowered in Pond #3 to allow construction of emergency spillway (Task 4951) and removal of tamarisk.



Above: Cobbles Pond #3 inlet.



Above: Removing spoil from excess spoil pile surface.



Above: Temporary access for the reconstruction of Robinson Creek as seen from the excess spoil pile.



Above: Pond #4.



Herding cattle on the reclaimed Pits 25 – 28, above, and on the south side of the excess spoils pile, below.

