



# State of Utah

## DEPARTMENT OF NATURAL RESOURCES

MICHAEL R. STYLER  
*Executive Director*

### Division of Oil, Gas and Mining

JOHN R. BAZA  
*Division Director*

June 9, 2015

Kirk Nicholes, Resident Agent  
Alton Coal Development, LLC  
463 North 100 West, Suite 1  
Cedar City, Utah 84720

Subject: Pond 1 and Water Valve, Alton Coal Development, LLC, Coal Hollow Mine, C/025/0005, Task ID #4894

Dear Mr. Nicholes:

The Division has reviewed your application. The Division has identified deficiencies that must be addressed before final approval can be granted. The deficiencies are listed as an attachment to this letter.

The deficiencies authors are identified so that your staff can communicate directly with that individual should questions arise. The plans as submitted are denied. Please resubmit the entire application.

If you have any questions, please call me at (801) 538-5325.

Sincerely,

Daron R. Haddock  
Coal Program Manager

DRH/sqs  
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**GARY R. HERBERT**  
Governor  
**GREG BELL**  
Lieutenant Governor

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**Technical Analysis and Findings**  
**Utah Coal Regulatory Program**

**PID:** C0250005  
**TaskID:** 4894  
**Mine Name:** COAL HOLLOW  
**Title:** POND 1 AND WATER VALVE

**General Contents**

**Maps and Plans**

*Deficiencies Details:*

Deficiency:  
R645-121.200. Clear and concise. The Drawing 5-28 is of Sediment Impoundment Pond 1. The narrative in the center of the document should only refer to design specifications regarding Sediment Impoundment Pond 1. Remove any narrative that is not directly related to Sediment Impoundment Pond 1.

kstorrar

**Operation Plan**

**Hydrologic Impoundments**

*Deficiencies Details:*

R645-301-733.130. In addition to updating Sediment Impoundment Pond 1 STORAGE VOLUME COMPUTATIONS, the application will need to update the narrative in Appendix 5-2 in the MRP supporting these computations.

kstorrar

**Support Facilities and Utility Installations**

*Deficiencies Details:*

R645-301-526.220 requires a facilities description that states how the support facilities will be operated in accordance with a permit issued for the mine; this includes plans and drawing for each:

The application does not include any changes to the text within Chapter 5 section 526 where the Permittee should detail: the number and size of tanks at each location, what each tank will be used for in mine operations, length and purpose of pipelines, and to what extent the various parts of the water plan will be reclaimed or left in place. The details say the pipelines to the underground and buried while site inspections show that the pipeline is on the surface. In the event any of the tanks or pipelines will remain in place there must be a validation to meet R645 rules.

There is no discussion of the tanks pads that should be included as it is relevant to bond estimates at final reclamation. The Permittee should detail how each of the respective tanks is secured, i.e. concrete pads either within Chapter 5 or on Drawing 5-8c. If the tanks are mounted on mobile equipment it needs to be clarified as such within the text.

R645-301-531, -532,-533, & -742.220 requires certified detailed design plans for siltation structures and impoundments that meet 10 yr, 24 hr design storm. The updated Pond 1 has different dimensions from the original Pond 1 but the storage volume computations remain unchanged. The storage volume computations need to be updated for the as-built Pond 1.

cparker

## Maps Facilities

### *Deficiencies Details:*

R645-301-521.161 and -301-121.200 requires maps of the proposed features that clearly show buildings, utility corridors, and facilities to be used. The current application drawing 5-8C does not meet the minimum requirements of the above rule as the drawing is not clear and concise and missing information:

A call out of concrete pads or other means of stabilization/foundations for the tanks

- o The map is missing details, since there is no text discussion, of the foundations for the tanks, i.e. concrete pads.

A call out for the number of tanks present at the facilities area

- o The tank symbol is clearly repeated near the facilities area, but it is unclear how many tanks are being represented.

A call out for a presumed "North Tank" and "South Tank", based on details shown below the plan view of the site on Drawing 5-8C

- o The details of the two tanks are located below the plan view of the site on drawing 5-8C. The first detail calls out a tank receiving water from the well and an outlet line to "North Tank". There is no tank labeled North Tank on drawing 5-8C. The second detail appears to be the connection from "South Tank". There is no tank labeled South Tank on drawing 5-8C.

The Permittee will supply a corrected Drawing 5-8C that details the dimensions of the foundations for the respective tanks or add text to Chapter 5 including such details, clarify where the South and North Tank are located, and call out the number of tanks present at the facilities area.

cparker

## Reclamation Plan

### Bonding Determination of Amount

#### *Deficiencies Details:*

The application does not meet the minimum requirements of R645-301-830 as the Permittee did not supply update reclamation cost for the additional line items updated within the application, such as the additional tank removal, concrete demolition, pipeline removal/backfill, and updated earthwork regrading for backfilling of Pond 1

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