



State of Utah

DEPARTMENT OF NATURAL RESOURCES

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Division of Oil, Gas and Mining

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July 27, 2015

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

Subject: Pipeline from Pit 10 to Sediment Pond 3, Alton Coal Development, LLC, Coal Hollow Mine, C/025/0005, Task ID #4951

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 by no later than August 27, 2015.

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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Technical Analysis and Findings

Utah Coal Regulatory Program

PID: C0250005
TaskID: 4951
Mine Name: COAL HOLLOW
Title: PIPELINE FROM PIT 10 TO SED POND 3

Environmental Resource Information

Probable Hydrologic Consequences Determination

Deficiencies Details:

R645-301-724.320 and R645-301-728.333. The application does not meet the minimum hydrologic requirements by providing an analysis and commitments of how mine water discharge may affect or alter streamflow in Lower Robinson Creek. Additionally, pre-flow documentation of the channel (overlapping photos along the channel length) is necessary to identify future scour caused by sustained mine water discharge flows within Lower Robinson creek.

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Operation Plan

Hydrologic Impoundments

Deficiencies Details:

R645-301-742.220. The storage volume computations found in the Drawing 5-28 table labeled 'Sediment Impoundment Pond 1 STORAGE VOLUME COMPUTATIONS' are incorrect. Correct calculations of the storage size of Pond 1 are needed.

R645-301-733.130. The supporting narratives of Pond 1 in Volume 7 pg. 7-65, Appendix 5-2, etc. need to be updated to reflect the correct pond size.

R645-301-746.221: A non-erosive apron is necessary at the outlet of the mine water discharge pipe flowing into Pond 3. Prior experience has shown rip-rap does not adequately stabilize and protect water conveyance structures (ditches, inlets, outlets, etc.) from eroding. Therefore, additional stabilization of the rip-rap apron is necessary. Possible stabilization designs include, but are not limited to: a gravel or fabric filter under the rip-rap or a grouted rip-rap curtain that will aid in stabilizing the extremely erosive soil base of the apron.

R645-301-743.131.1 -- Sediment Pond 3's discharge spillway for the decant pipe does not meet the minimum requirement to carry sustained flows.

R645-301-733.120: Sediment Pond 3 Drawing 5-30 needs to be updated showing the mine water discharge pipe and the apron at its base, and the stabilized outlet design of the decant pipe.

R645-301-742.221.33: In the event of continuous mine water discharge to Pond 3, the static water level will leave only 3' of freeboard from the decant pipe inlet to the emergency spillway, or only 4.98 ac/ft of storage. Thus, Sediment Pond 3 no longer meets the 100 year 24 hour design storm. The calculations, tables and narratives in Appendix 5-2 and Volume 7 need to be updated to show the pond will meet the requirement of treating a 10-year 24-hour runoff event.

R645-301-733. The application needs to provide engineered drawings of the water impoundment structure in the base of Pit 10.

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