



State of Utah

DEPARTMENT OF NATURAL RESOURCES

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Executive Director

Division of Oil, Gas and Mining

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September 21, 2015

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

Subject: Pit 10 to Pond 3, Alton Coal Development, LLC, Coal Hollow Mine, C/025/0005, Task ID #4967. Outgoing File

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. As this is the third review of this application, we request that you resubmit the entire application no later than September 30, 2015.

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

Sincerely,

Daron R. Haddock
Coal Program Manager

DRH/pwb
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Technical Analysis and Findings

Utah Coal Regulatory Program

PID: C0250005
TaskID: 4967
Mine Name: COAL HOLLOW
Title: PIT 10 to SED POND 3

Operation Plan

Spoil Waste Impounding Structures

Deficiencies Details:

The application does not meet the minimum standards of R645-301-533 due missing text updates within the MRP text in regards to Appendix 5-13 and discussion of the additional flow to Sediment Pond 3.

- The Permittee will update the MRP text to include updated references and information found in Appendix 5-13:
 - o Chapter 5 Section 526.300, page 5-38
 - o Chapter 5 Section 531, page 5-54
 - o Chapter 5 Section 533.700, page 5-57

cparker

Hydrologic General

Deficiencies Details:

R645-301-731; R645-301-120.200: The application does not provide a reference of where aerial photography of Lower Robinson Creek channel can be found. Additionally, the aerial photography in Appendix 7-1 does not show where Lower Robinson Creek channel and the channel receiving discharge from Sediment Pond 3 join. Pre-flow documentation of the channel downstream of Pond 3 (overlapping photos along the channel length) is necessary to identify future scour caused by sustained mine water discharge flows within Lower Robinson creek.

R645-301-728.333; R645-301-731.121: The application must establish a threshold value to define continuous mine-water discharge (volume/time) from the underground workings. In the event continuous mine-water discharge occurs, the Permittee must commit to updating the Probable Hydrologic Consequences. The commitments to update the PHC will trigger a study as to whether streamflow alteration is impacting the quantity or quality of water resources adjacent to the permit area.

kstorrar

Hydrologic Sediment Control Measures

Deficiencies Details:

R645-301-742.123: The amendment does not meet the minimum hydrologic requirements of diverting runoff in a protected channel. Appendix 5-2 shows the calculated flow velocity of Ditch 4 exceeds the reasonable non-erosive velocity of 4-5 fps for a grass lined open channel. Runoff velocities in Ditch 4 increase even beyond the calculated velocity when routed

through the inlet to Pond 3 because there is a steep drop in elevation into the pond. The application must design the inlet to Sediment Pond 3 so it is stable and provide calculations for rip-rap sizing. Drawing 5-30 will be updated to show the new design that will stabilize the inlet.

kstorar

Hydrologic Siltation Treatment

Deficiencies Details:

R645-742.221.33: The amendment does not meet the minimum hydrologic requirements for sediment pond sizing in the State's Coal Mining rules. The amendment needs to provide a narrative of the methodology and show the calculations for determining 4.95 ac. ft. is the runoff volume for a 10-year 24-hour event from Watershed 3 (Dwg. 5-26). These calculations will be shown and added to the Sediment Impoundment Sizing tables in Appendix 5-2.

kstorar

Support Facilities and Utility Installations

Deficiencies Details:

ANALYSIS:

The application does not meet the minimum requirements of R645-301-521.180 and -526 the require the description, plans, and drawing for each support facility to be constructed, used, or maintained within the proposed permit area. Text updates are missing within the MRP in regards to Appendix 5-13 and discussion of the additional flow to Sediment Pond 3.

- â€¢ The Permittee will update the MRP text to include updated references and information found in Appendix 5-13:
 - o Chapter 5 Section 526.300, page 5-38
 - o Chapter 5 Section 531, page 5-54
 - o Chapter 5 Section 533.700, page 5-57

cparker