



GARY R. HERBERT  
Governor

SPENCER J. COX  
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

April 26, 2017

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

Subject: Pond T1 Certification, Alton Coal Development, LLC, Coal Hollow Mine,  
C/025/0005, Task ID #5409

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  
O:\025005.COL\WG5409 POND T1\Deficiencies.doc



**State of Utah**  
 DEPARTMENT OF NATURAL RESOURCES  
 MICHAEL R. STYLER  
*Executive Director*  
 Division of Oil, Gas and Mining  
 JOHN R. BAZA  
*Division Director*

## Technical Analysis and Findings

### Utah Coal Regulatory Program

**PID:** C0250005  
**TaskID:** 5409  
**Mine Name:** COAL HOLLOW  
**Title:** POND T1 CERTIFICATION

#### Environmental Resource Information

##### General

*Analysis:*

The amendment meets the State of Utah R645 requirements for R645-301-300 Biology and R645-301-400 as this amendment does not make any changes to the existing approved MRP in these sections.

Ireinhart

#### Operation Plan

##### Topsoil and Subsoil

*Analysis:*

**Analysis:**  
 The application does not meet the requirements of R645-301-231 topsoil operation plan, because unrecovered topsoil in the disturbed area will be protected with excelsior logs placed across ditch DD-1A-01 at 20 foot intervals. The area should be described as an ASCA and the sediment control should be stated.

*Deficiencies Details:*

The application does not meet the requirements of R645-301-231 topsoil operation plan, prior to approval, please provide the following in accordance with:

R645-301-231.100, Unrecovered topsoil within the disturbed area East of Pond T1 should be described as an Alternate Sediment Control Area (ASCA) protected with excelsior logs that are placed across ditch DD-1A-01 at 20 foot intervals.

pburton

#### Hydrologic Sediment Control Measures

*Analysis:*

The amendment meets the State of Utah R645 requirements for Sediment Control Measures.

The best technology currently available is being implemented in 'Area 1 Extension'. Drainage from the disturbed Area 1

Extension reports to T1 and other sediment control measures such as silt fences. T1 is built and adequately sized to totally contain a runoff event from Area 1. The amendment provides a narrative, calculations and supporting maps and cross-sections. T1 is equipped with an engineered pump and pipeline water conveyance system to draw down captured runoff within the structure. The water will be conveyed from T1 to Pond 6. Treated water in Pond 6 may be discharged through the UPDES outfall issued for the structure.

kstorrar