



State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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April 17, 1997

TO: File

THRU: Joe Helfrich, Permit Supervisor 

FROM: Mike Suflita, Reclamation Hydrologist 

RE: Exploration Plan, Canyon Fuel Company, LLC, Convulsion Canyon Mine, ACT/041/002-EXP-96C. Folder #2, Sevier County, Utah

Canyon Fuel Company is proposing to drill three exploration holes within the permit area for the Convulsion Canyon Mine. Since the sites are in federal land, the Division is not the lead permitting agency but simply provides comments. The exploration plan is basically acceptable, but a few changes would probably improve reclamation.

The holes will be completely plugged from bottom to top with cement/bentonite slurry as described and confirmed in phone conversation with Chris Kravits. This should prevent cross-contaminating groundwater aquifers. A field visit confirmed that all drilling sites are above perennial and ephemeral streams. Combined with hole plugging, surface water cannot mix with ground water.

The use of pits will confine the development waste, foam, & drilling mud to the pits. This will also make reclamation over this excess material easier. Since the waste may contain acid- or toxic-forming materials, the area containing these wastes are required to be covered by a minimum of four feet of cover. Reference State of Utah Coal Mining Rules R645-202-236 which references paragraph 553.260 & .250. This cover can be achieved using the material excavated from the mud pit and salvaged subsoil and topsoil which are already being set aside as described in the plan. Alternatively, the materials removed from the holes can be tested for DOGM determination of their acid- and toxic-forming potential.

Soil will be piled for storage on the uphill side of the sites and silt fences will be employed on the downhill sides. This will minimize runoff impacts during the relatively short time of exposure to runoff. Improvements to site reclamation are covered in a previous evaluation and will not be duplicated here.