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

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July 9, 1998

To: File

Thru: Joe Helfrich, Permit Supervisor-Compliance *JH*

From: Peter Hess, Reclamation Specialist III *PH*

RE: Link Canyon Substation, Canyon Fuel Company, SUFCO Mine, ACT/041/002-98-1, Folder #2, Sevier County, Utah

SUMMARY:

Canyon Fuel Company's SUFCO Mine is proposing to permit a new portal breakout in the Link Canyon area in order to upgrade the electrical requirements and provide a fresh air escapeway for that portion of the Mine. The breakout will be made from underground utilizing continuous miner methods. The Link Canyon area is managed by the U. S. Forest Service, Manti-Lasal National Forest Division.

TECHNICAL ANALYSIS:

OPERATION PLAN

COAL MINE PERMITTING: ADMINISTRATIVE PROCEDURES

Regulatory Reference: R645-300-121.150 and R645-301-521.133.1

Analysis:

Management of Mine Openings

The permittee is proposing to install an electrical substation adjacent to the Link Canyon public access road. As indicated above, Link Canyon is part of the Manti-Lasal National Forest, and, as such in under management by that agency. Appendix 1-1 contains a letter from Mr. Ken May, General Manager of SUFCO to Ms. Janette Kaiser, Forest Supervisor of the Manti-LaSal National Forest requesting approval from that agency to construct the substation within a



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hundred feet of the Forest Service development road as required under R645-300-234.100. As of the date of this writing, the status of that request is unknown, as it is dependent upon an environmental assessment being conducted by the U.S. Bureau of Land Management.

The permittee has posted notice in the Sevier County and Emery County newspapers requesting comments and/or concerns from the public concerning the installation of this substation. The comment period closed on June 20, 1998, with no comments (according to the permittee) being received.

There will be no relocation or closure of the forest development road during the construction of the substation access road.

Analysis:

The permittee has completed the administrative procedures necessary according to the R645 rules for conducting mining activities within 100 feet of a public access roadway.

Findings:

Upon acceptance of the environmental assessment by the U. S. Forest Service, and in consideration of their recommendation for approval or denial, it is recommended that the Division approve the engineering sections of this submittal regarding the operation and reclamation plan for the Link Canyon portal breakout, substation and power line.

OPERATION PLAN

As noted above, the portal breakout will be made from inside the mine utilizing continuous mining methods. Upon breakthrough, coal and development waste will be cleaned up to the best extent possible using the continuous miner/shuttle car scenario. All material will be shipped through the mine exiting at the East Spring Canyon processing plant. The area will then be supported initially with conventional techniques. Additional support in the form of beams and/or crossbars may be necessary to support this area over it's expected life.

Analysis:

Management of Mine Openings Regulatory Reference: R645-301-529
R645-301-513.500
30 CFR 75.1711-3

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The permittee has committed to barring unauthorized entrance to the Mine by indicating that chain link gates will be installed to protect the public. The Link Canyon portal is approximately 325 feet (slope length) from the Link Canyon public access road to the portal. As Link Canyon is an isolated area, the barring of the portal area is mandatory for the protection of the public.

The Link Canyon portal breakout, substation and power line will create an additional 0.367 acres of disturbance.

Findings:

ACT/041/002-98-1 fulfills the requirements of the R645 rules regarding the management of mine openings during the mines operation phase.

TRANSPORTATION FACILITIES

Regulatory Reference: R645-301-527.100-250

R645-301-527.100 and .110

The plan classifies the Link Canyon substation access road as an ancillary road.

R645-301-527.210 Road Specifications

The length of the access road from the public road to the substation fence is 100 feet. Roadway width is 14 feet. Gradient, and cut and fill calculations are depicted on Plate 5-2D, as is the ditch design for the diversion routing the drainage from the undisturbed watershed LINK and ASCA-1. The specifications for the parabolic road swale draining ASCA-1, LINK, and ASCA-3 are indicated in Table 7-9, (Page 7-75). Page 5-41, paragraph 1 indicates that the access road will have a dirt surface.

Analysis:

The requirements of the R645 rules for road specifications have been met.

Findings:

The requirements of the R645 rules have been met regarding road specifications.

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R645-301-527.230 Maintenance Plan

Page 5-42

SUFCA has committed to maintaining the Link Canyon substation access road within the limits of the disturbed area perimeter. The USFS maintains the public road in this area. SUFCA has committed to repair damage to the public road in the Link Canyon area from impacts associated with mining.

Analysis:

The requirements of the R645 rules for a road maintenance plan have been met.

Findings:

The submittal is adequate to address the R645 rules regarding the requirement to have a road maintenance plan.

R645-301-527.240 Commitment to Repair Catastrophic Damage

Pages 5-41 and 42

SUFCA is committed to repair damage created by catastrophic events for the mine access roads within the permit area. They also have a cooperative agreement with the Sevier County Road Department to repair road damage from any catastrophic event outside of the mine permit area.

Analysis:

The requirements of the R645 rules have been met with regard to committing to repair roads both within and outside the mine permit area due to damage caused by catastrophic events.

Findings:

The submittal is adequate to address the requirements of the R645 rules regarding the repair of roads due to catastrophic damage.

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R645-301-527.250 Geotechnical Analysis

The Link Canyon public access road has been in place for many years. The permittee is not requesting alternative road specifications, nor are steep cut slopes necessary. No geotechnical analysis is therefore necessary.

Analysis:

The requirement of the R645 rules to conduct a geotechnical analysis for the installation of the Link Canyon access road is not necessary, because alternative road specifications and steep cut slopes have not been requested or designed.

RECLAMATION PLAN

Regulatory Reference R645-301-540

Page 5-34 SUFCO MRP Section 5.2.6.2 Utility Installation and Support Facilities.

Utility Installations

“All utility installations associated with the SUFCO Mine will be removed following mining in accordance with the reclamation plan discussed in Section 5.40.”

Regulatory Reference R645-301-542.200 Backfilling Plan

Page 5-58 “The regrading plan for the Link Canyon substation facility area will be to reclaim it for its entire length. This substation facility area will be regraded by removing fill from beneath the pad to the natural ground surface and placing the fill against the adjacent cut slope. Following regrading of the substation facility area the site will be revegetated as indicated in Section 3.4.1.2.

Plate 5-2D Detail of Link Canyon Surface Facilities shows cross sections A-A', B-B', and C-C' and dirt volumes for cut and fill of 409.93 and 408.78 cubic yards respectively. Lines indicate that the reclamation of the substation access road and pad will return this fill to the approximate original contour of the area. Plate 5-2D has been P.

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E. certified by Mr. Wes Sorensen, (see 542.310).

Regulatory Reference R645-301-543.600 Roads

Page 5-66 The permittee has committed to the following; "The Link Canyon substation access road will be reclaimed for its entire length." "This road will be closed to traffic following reclamation by virtue of its non-existence", (see 542.610).

Regulatory Reference R645-301-542.700 Final Abandonment of Mine Openings and Disposal Areas

Page 5-67 SUFCO MRP Section 5.4.2.7. The permittee has committed to seal the Link Canyon portal area in accordance with the R645 rules and CFR 30, Part 75.1711-2.

Analysis:

The permittee has fulfilled the requirements of the R645 regulations with regard to the reclamation plan necessary to reclaim the Link Canyon substation and it's associated access road.

Findings:

The reclamation plan for the area adequately addresses the requirements of the R645 rules.

BONDING

Regulatory Reference: R645-301-820 Requirement to File a Bond

Page 5-68, Section 5.4.2.8 Estimated Cost of Reclamation

The permittee has provided reclamation cost estimates in Appendix 5-9.

Appendix 5-9 indicates that an amount of \$13,730 will be necessary to reclaim the Link Canyon substation and it's associated access road. An amount of \$272,593 currently exists as contingency dollars in the SUFCO reclamation bond amount. This would be reduced by \$13,730 to cover the reclamation in the Link Canyon area.

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Therefore, it is not necessary to increase the total bond amount for the SUFCO Mine at this time.

Analysis:

It appears that, assuming that the reclamation cost figures for the Link Canyon substation and its associated access road are accurate, the permittee has met the bonding requirements necessary as indicated by the R645 rules.

Findings:

The submittal is (assuming the reclamation cost figures are accurate) adequate to meet the requirements of the R645 rules requiring the posting of a reclamation bond.

RECOMMENDATION:

Based on the aforementioned analyses of the engineering requirements of the R645 rules, it is my recommendation that amendment **ACT/041/002-98-1, Link Canyon Ventilation Portal, Substation and Power line** be approved.

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