

0045



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

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TO: File

THRU: Daron Haddock, Permit Supervisor 

FROM: Michael Suflita, Senior Reclamation Specialist 

RE: Midterm Review with Emphasis on Hydrology, Canyon Fuel Company, LLC, SUFCO Mine, ACT/041/002-MT99, File #2, Carbon County, Utah

SUMMARY:

The SUFCO Permit is at its midterm and Division review is required. This review emphasizes the Hydrology aspects of the Mining and Reclamation Plan (MRP) and includes a review of past monthly inspections, submitted water monitoring data, correspondence, and the basic MRP. A minesite visit by the evaluation team was also held.

TECHNICAL ANALYSIS:

HYDROLOGIC INFORMATION

Regulatory Reference: R645-300-730

Analysis:

As part of the midterm review the following documents were reviewed to determine their applicability to the SUFCO Mine using the Best Technology Currently Available (BTCA) to prevent additional contributions of suspended solids, or other contaminants, to stream flows outside of the permit area.

- MRP Chapter 7, Hydrology.
- MRP Appendices 7-3 through 7-17 which contains all the Hydrologic designs for the mine.
- Correspondence Folder #2 for the SUFCO Mine, for the last two years.
- Inspections Folder #5 for the SUFCO Mine for the past two years.
- Water monitoring data in the DOGM database.

The MRP contains appropriate provisions for many diversion ditches and culverts and these have all been installed. They have been designed to meet regulatory requirements. Also, numerous plan amendments have modified the basic plan over the life of the current permit. The inspection reports indicate the diversions have been performing adequately and they have been regularly maintained as needed to maintain their capacity. Sediment control measures at the minesite consist of straw bales, silt fences, berms, and vegetative cover. Inspection reports indicate these are performing as intended and adequately reduce sediment loss. These have also been maintained as needed to retain their capacity. The minesite temporary rock storage site is also operated to minimize sediment loss.

There was one instance of coal fines leaving the permit area due to a bulldozer opening a previously installed culvert. The area was cleaned up and the culvert permanently filled. Another instance occurred where burrowing rodents in the sewer system drain field caused sewage to leak out. This too was repaired without incident. Both of these are regarded as unusual events and not neglect, although the mine received a Notice of Violation and paid a fine for both events.

A check of the water monitoring data submitted by the mine, and regular inspection reports, showed the water monitoring data are being sent to DOGM as required by the MRP.

The sediment ponds at the waste rock site and minesite appear to have been adequately designed and have been performing as intended. They seldom discharge. The mine has been almost late in cleaning out the minesite pond on some occasions, but otherwise have operated the pond successfully.

A minesite visit as part of the midterm review showed the sediment trap performing as designed and greatly reducing the sediment load to the sediment pond. There were two areas on the north and northeast perimeter of the disturbed area that had been covered to stop erosion. The covering was a sprayed-on concrete with an open fabric mesh used in the mine. The top of the assembly was keyed into the ground and water flowed over the protected areas. They were performing quite well in terms of reducing and virtually eliminating erosion from the hillside. Other aspects of minesite drainage observed during the visit appeared adequate.

The Alternate Sediment Control Areas (ASCA) were inspected at the mine and they appeared to be adequately vegetated. Interestingly, an area west of the minesite and about 700 feet up the hillside had smoke and/or steam coming from the ground. Mine personnel attribute this to a coal burn in the underlying seam. The weather conditions were just right to see this condition.

As a reminder, the Division has indicated to all coal mines that Electronic Data Input will be mandatory when mine permits are renewed. Midterm review of this permit seemed a good time to reemphasize that point.

Findings:

The current operation of the SUFCO Mine is considered adequate to meet this regulation. The mine is using the Best Technology Currently Available to prevent additional contributions of suspended solids, or other contaminants, to stream flows outside of the permit area.

RECOMMENDATION

Based on this midterm review, the SUFCO mine can continue operation without changes to the Mining and Reclamation Plan.