



# State of Utah

DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF OIL, GAS AND MINING

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February 24, 2000

TO: Internal File

THRU: Pete Hess, Team Lead/ Robert Davidson, Team Lead *RAD SM for PHH*

FROM: David Darby, Senior Reclamation Specialist *[Signature]*

RE: Link Canyon Breakout, Canyon Fuel Company, LLC, SUFCO Mine, ACT/041/002-99G-2

## SUMMARY:

The Division received a response to the Link Canyon technical deficiency document of on February 7, 2000. The response addresses deficiencies outlined in a letter to the operator on January 20, 2000. The original plans were submitted on December 6, 1999.

The updated plans describe a new site where drilling and surface facilities of the substation will be developed. The plans supply the requisite hydrologic information along with maps and data to make the findings.

The operator, SUFCO Company, LLC, proposed to construct the electrical substation (Substation #2) in Link Canyon. A permit was previously issued for a substation (Link Canyon Substation #1) 0.4 miles down the canyon from this proposed location on January 11, 1999. SUFCO was forced to halt development and abandon the project when drilling operations contacted high temperatures from the burning coal seam.

The hydrologic information submitted in this application is sufficient to make a findings of technical adequacy.

## TECHNICAL ANALYSIS:

## **ENVIRONMENTAL RESOURCE INFORMATION**

Regulatory Reference: Pub. L 95-87 Sections 507(b), 508(a), and 516(b); 30 CFR Sec. 783., et. al.

## **CLIMATOLOGICAL RESOURCE INFORMATION**

Regulatory Reference: 30 CFR Sec. 783.18; R645-301-724.

### **Analysis:**

The applicant addresses climatological resource information in the Chapter 7-23 of the MRP. Data is submitted In Appendix 7-5.

### **Findings:**

The applicant has satisfactorily addressed this section.

## **HYDROLOGIC RESOURCE INFORMATION**

Regulatory Reference: 30 CFR Sec. 701.5, 784.14; R645-100-200, -301-724.

### **Analysis:**

There are no standing or flowing surface water resources in the immediate vicinity of the immediate vicinity of Substation #2 that needs to be monitored or will be impacted. The channel in Link Canyon is ephemeral.

### **Findings**

The applicant has submitted sufficient information in the MRP to address this section.

## **OPERATION PLAN**

### **HYDROLOGIC INFORMATION**

Regulatory Reference: R645-301-742, -301-761.

### **Analysis**

The operator has submitted the hydrologic information in addendums for the MRP. In a meeting held with mine personnel, Mike Davis, Chris Hansen and Gary Taylor on February 4,

2000. Mike Davis explained the routing process planned for the substation. He addressed the deficiency on routing flows across the road.

The disturbed area boundary is 0.21 acres. The undisturbed drainage above the substation is approximately 25.8 acres. An evaluation of the topographic lines above the disturbed reveals that the amount of runoff reaching the undisturbed ditch will be less than proposed, because the undisturbed drainage is smaller than proposed in the Amendment.

Runoff generated on the undisturbed area above the #2 Substation tends to flow in two directions. A portion will flow south of the substation, where it will collect in the ditch along the road, then flow down the ditch until it encounters a swell or water bar before it crosses the road. Runoff generated on the northern half of the undisturbed area will flow down to the road or undisturbed ditch above the disturbed area. The operator calculated a peak runoff volume of 0.2 cfs from the 25.8 acre undisturbed area above the Substation #2 .

The undisturbed runoff flowing directly down toward the disturbed area will be captured in an undisturbed diversion ditch along with disturbed area runoff from ASCA-4, detailed ditch information is shown in Table 7-9. Flow in this ditch will be treated by a silt fence (which is not shown on Plate 5-2E, but mentioned in the Amendment, Page 7-28) before it flows into the diversion ditch along the inside of edge of the Link Canyon Road. The collected flow will be transported down to the roadway drainage then into the main channel. The runoff will then flows down the ditch until it encounters a existing water bar, where it will cross the road. The undisturbed diversion ditch is sized to transport the runoff from a 10 yr-6 hr precipitation event. A summary of the figures used to calculate the 10 yr- 6 hr precipitation event is shown in Appendix 7-13.

The disturbed area is approximately 0.4 acre. Most of the area will be treated by berms and silt fences. The applicant shows Plate 5-2E, gravel will be placed on the surface of the disturbed area, reducing the potential for erosion. The applicant has submitted information in the amendment indicating that the majority of runoff from the disturbed area will be contained by berms treated with silt fences. A very small portion of the access (approximately 200 square feet) will flow directly into the undistrubed ditch along the road, however the graveled surface of the pad and access will minimize erosion and sediment yield. No adverse conditions or contamination is expected.

## **Findings**

The applicant has submitted sufficient information to address hydrologic conditions at Substation #2. Hydrologic structures have been planned to prevent off site contamination from erosion. No adverse impacts are expected.

## **MAPS, PLANS, CROSS SECTIONS OF MINING OPERATIONS**

Regulatory Reference: R645-301-521.100

### **Analysis:**

#### **Mining Facilities Maps**

The applicant has submitted Plate 5-2E, which details the surface area, undisturbed area, disturbed area and cross-sections of the pad, during operations and after regrading for reclamation.

### **Findings:**

The applicant has satisfactorily addressed this section.

## **RECLAMATION PLAN**

### **HYDROLOGIC INFORMATION**

#### **Analysis:**

The applicant has discussed reclamation proceedings. In light of the fact that there are no surface or ground-water sites in the immediate vicinity of the substation, there will be no impacts to standing surface or ground-water resources.

There is no surface or ground-water monitoring sites attached to this site that require monitoring. There are no wells to plug or transfer. There should not be any acid or toxic forming materials excavated during construction.

There will be no mine water discharge or gravity discharged from the mine, or surface water discharged into the mine.

All water quality standards will be met. The applicant describes on Page 5-58, how the site will be backfilled, graded and revegetated. Silt fences placed similar to the locations seen in Plate 5-2E will be erected and maintained until effluent limitations are met from any flow off the disturbed site.

All diversions on the disturbed area will be removed during grading. Road diversions will be left in-place.

**Findings:**

The applicant has addressed this section.

**OPERATIONS IN ALLUVIAL VALLEY FLOORS**

Regulatory Reference: 30 CFR Sec. 822; R645-302-324.

**Analysis:**

There are no perennial flows in Link Canyon. A determination has been made that no Alluvial Valley Floors exist in the Link Canyon drainage.

**Findings:**

The applicant has supplied information to address this section.

**RECOMMENDATIONS:**

It is recommended that the hydrologic section of the Link Canyon #2 Amendment, Amendment, ACT/002041/99G2 be approved..