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

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TO: Internal File

THRU: Dave Darby, Team Lead 

FROM: Wayne H. Western, Reclamation Specialist III *W H W*

RE: Pines Tract Lease, Canyon Fuel Company, LLC, SUFCO Mine, ACT/041/002-SR99D-2

SUMMARY:

I completed the second review of the Pines Tract amendment. The amendment still has deficiencies that must be addressed, before the amendment can be approved.

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.

PERMIT AREA

Regulatory Requirements: 30 CFR Sec. 783.12; R645-301-521.

Analysis:

The permit boundaries are shown on Plate 5-6, Land Ownership and Permit Area Map. The plate has a scale of 1" = 2000'. It shows the existing permit boundaries and the proposed Pines Tract expansion.

TECHNICAL MEMO

On Page 1-33 through 1-35 the Permittee lists the legal descriptions for the federal leases and fee ground. The Permittee also states that 13.03 acres under U.S. Forest Service special use permits are included in the permit and disturbed areas.

Findings:

The Permittee has met the minimum requirements of this section.

MAPS, PLANS, AND CROSS SECTIONS OF RESOURCE INFORMATION

Regulatory Reference: 30 CFR Sec. 783.24, 783.25; R645-301-323, -301-411, -301-521, -301-622, -301-722, -301-731.

Analysis:

Affected Area Boundary Maps

Plate 5-5 shows the affected area boundary.

Existing Structures and Facilities Maps

Plate 5-5 shows the existing structures and facilities for the permit area. Plate 5-2A is a detailed map of the surface facilities.

Existing Surface Configuration Maps

Plate 5-5 shows the existing surface configuration for the Pines tract. The Permittee shows the Muddy Creek breakout on Page 5-12A, Figure 5-0, of the amendment. The contour map of the Muddy Creek breakout has contour lines at 5 foot intervals and a scale of 1" = 40'. However, Figure 5-0 is not labeled as the premining contour map and cross section. That information will be needed to insure proper reclamation.

Mine Workings Maps

Plate 5-1 shows the previous mine workings.

Permit Area Boundary Maps

Several maps show the current and proposed permit boundary maps.

Surface and Subsurface Ownership Maps

Plate 5-6 shows the surface and subsurface ownership.

Findings:

Information provided in the proposed amendment is not considered adequate to meet the requirements of this section. Prior to approval, the Permittee must provide the following in accordance with:

R645-301-521.150 and R645-301-190, The Permittee must give the Division a contour map and cross sections that clearly show the premining configuration of the Muddy Portal disturbed area.

OPERATION PLAN

MINING OPERATIONS AND FACILITIES

Regulatory Reference: 30 CFR Sec. 784.2, 784.11; R645-301-231, -301-526, -301-528.

Analysis:

Type and Method of Mining Operations

The Permittee will use longwall mining methods whenever possible to mine coal. In areas where longwall cannot be done room-and-pillar mining methods will be used.

Facilities and Structures

The only new surface facility for the Pines Tract is the breakout portal.

Findings:

The Permittee met the minimum requirements of this section.

EXISTING STRUCTURES

Regulatory Reference: 30 CFR Sec. 784.12; R645-301-526.

Analysis:

The existing structures listed on Plate 5-5 are a stock watering pond, several runoff ponds, a fence and dirt roads.

TECHNICAL MEMO

Findings:

The Permittee met the minimum requirements of this section.

COAL RECOVERY

Regulatory Reference: 30 CFR Sec. 817.59; R645-301-522.

Analysis:

The Permittee stated that the BLM has approved the R2P2. The Permittee gave additional information about coal recovery in the amendment. The Division reviewed the information and concluded that the coal recovery plan is adequate.

Findings:

The Permittee met the minimum requirements of this section.

SUBSIDENCE CONTROL PLAN

Regulatory Reference: 30 CFR Sec. 784.20, 817.121, 817.122; R645-301-521, -301-525, -301-724

Analysis:

Renewable resources survey.

The Permittee identified the renewable resources on Plate 4-1A and Plate 4-1B. Those plates have scales of 1" = 1,000' (1 to 12,000).

Subsidence control plan

1. The Permittee proposes to use longwall and room-and-pillar mining methods to extract the coal. The Permittee shows the mine layout on Plate 5-2C.
2. Plate 5-10B shows the underground working. The Permittee states on that plate the methods will be used to prevent subsidence. First mining only and no extraction areas are the methods used to control subsidence.
3. The descriptions of the physical condition that could affect subsidence were by the Division's geologist and found adequate.

4. The general subsidence control plan in the MRP was determined adequate for the existing permit. The proposed changes to the plan are shown on Plate 5-10B. On that plate the Permittee shows the areas that will be protected from subsidence and the limits of surface disturbance. Table 5-2 has been updated to show the new subsidence monitoring stations.
5. In the MRP the Permittee states that perennial stream will be protected from subsidence by establishing stream buffer corridors. See Plate 5-10B for details.
6. The Permittee states in the MRP that no subsidence damage should occur. If damage occurred, they would mitigate. In the past, subsidence damaged stock watering ponds. The Permittee mitigated the damages. If subsidence occurs again, the Permittee will undertake the same procedures.
7. The Permittee committed to repair any subsidence damage that should occur.
8. No significant surface resources are in the area that needs protection.

Performance standards for subsidence control

The Permittee committed to meet all subsidence performance standards.

Findings:

The Permittee met the minimum requirements of this section.

MAPS, PLANS, AND CROSS SECTIONS OF MINING OPERATIONS

Regulatory Reference: 30 CFR Sec. 784.23; R645-301-512, -301-521, -301-542, -301-632, -301-731, -302-323.

TECHNICAL MEMO

Analysis:

Affected area maps

The Permittee did not give the Division an affected area map. However, the mine map shows the extent of mining operations and the permit boundaries. The Division considers that map sufficient.

Mining facilities maps

The Permittee did not give the Division detailed maps and cross sections of the portal breakout area. Figure 5-0 shows a sketch of the breakout on an enlarged USGS topographic map. At a minimum the map must show the operational contours. Figure 5-0 is not labeled premining.

Mine workings maps

Plate 5-10A and Plate 5-10B show the mine workings, including updates for the Pines Track lease.

Monitoring and sample location maps

Other member of the review team will address this section.

Findings:

R645-301-521.150 and R645-301-190, The Permittee must give the Division a detailed contour map and cross sections that clearly show the operational configuration of the Muddy Portal disturbed area.

RECLAMATION PLAN

APPROXIMATE ORIGINAL CONTOUR RESTORATION

Regulatory Reference: 30 CFR Sec. 784.15, 785.16, 817.102, 817.107, 817.133; R645-301-234, -301-270, -301-271, -301-412, -301-413, -301-512, -301-531, -301-533, -301-553, -301-536, -301-542, -301-731, -301-732, -301-733, -301-764.

Analysis:

The Permittee stated that the information on AOC for the Muddy Creek breakout is on Figure 5-0. That figure does not clearly show the reclaimed topography and cross sections for the area.

Findings:

Information provided in the proposed amendment is not considered adequate to meet the requirements of this section. Prior to approval, the Permittee must provide the following by:

R645-301-553, The Permittee must give the Division a contour map and cross sections that show how the area will be reclaimed.

BACKFILLING AND GRADING

Regulatory Reference: 30 CFR Sec. 785.15, 817.102, 817.107; R645-301-234, -301-537, -301-552, -301-553, -302-230, -302-231, -302-232, -302-233.

Analysis:

The Permittee did not include detailed backfilling and grading plans for the Muddy Creek breakout. That figure does not clearly show the reclaimed topography and cross sections for the area.

Findings:

Information provided in the proposed amendment is not considered adequate to meet the requirements of this section. Prior to approval, the Permittee must provide the following in accordance with:

R645-301-552 and R645-301-553, The Permittee must give the Division detailed reclamation plans for the breakout portal area. A conceptual sketch is not adequate for the Division to determination if the backfilling and grading is adequate.

MAPS, PLANS, AND CROSS SECTIONS OF RECLAMATION OPERATIONS

Regulatory Reference: 30 CFR Sec. 784.23; R645-301-323, -301-512, -301-521, -301-542, -301-632, -301-731.

Analysis

Affected area boundary maps

The permit area maps and the mine maps show the affected area boundaries.

TECHNICAL MEMO

Bonded area map

The bonded area is the permit area and is shown on several maps.

Reclamation backfilling and grading maps

The Permittee did not give the Division backfilling and grading maps for the portal breakout areas.

Reclamation facilities maps

The Permittee does not propose to leave any facilities associated with the Pines Tract.

Final surface configuration maps.

The Permittee did not give the Division the final surface configuration maps for the breakout portal area.

Findings:

Information provided in the proposed amendment is not considered adequate to meet the requirements of this section. Prior to approval, the Permittee must provide the following in accordance with:

R645-301-542.200, The Permittee must give the Division detailed maps and cross sections that show how the breakout portal will be reclaimed. Those maps must show the final surface configuration.

BONDING AND INSURANCE REQUIREMENTS

Regulatory Reference: 30 CFR Sec. 800; R645-301-800, et seq.

Analysis:

Determination of bond amount

In Appendix 5-9 the Permittee states that the reclamation cost for the Muddy Creek portal is \$9,367. The Divisions has reviewed the reclamation costs and determine that the cost to close the portal will be at least \$20,000. That amount will be added to the reclamation cost estimate.

The Division usually does not increase the bond by less than 5%. Since the reclamation cost of the Muddy Creek portal is likely to be less than \$221,950, a bond increase is not likely.

Findings:

The Permittee met the minimum requirements of this section.

RECOMMENDATION:

The amendment should be denied until the deficiencies have been satisfied.