



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

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TO: ~~Internal File~~

FROM: Wayne H. Western, Senior Reclamation Analysis *W+W*

RE: Permit and Disturbed Area Boundary Maps, Canyon Fuel Company, LLC,
SUFCO Mine, ~~000000-AM01A~~

SUMMARY:

On February 20, 2001, the Division received AM01A for the SUFCo Mine. The amendment revised, corrected and clarified the permit and disturbed acreage, and boundaries. In addition to the revised text and Plate 5-6, the permittee also included a copy of Plate 5-6 in an AutoCAD file. The Division reviewed the text and maps. The Division needs clarification on why the road and underground utilities between the main mine site and the water tank site were not included in the disturbed area. The Division also needs an AutoCAD copy of the waste rock.

TECHNICAL ANALYSIS:

OPERATION PLAN

MINING OPERATIONS AND FACILITIES

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

Analysis:

General

Amendment AM01A revised, corrected and clarified the permit and disturbed acreage, and boundaries. Those modifications to the text are as follows:

- An unnamed table on page 1-37 that list the acreage in the disturbed areas, the actual acreage that has been disturbed and the site description.

TECHNICAL MEMO

- Acreage at the waste rock site on page 2-8 and 4-2.

The information in the revised text shows each disturbed area within the permit boundaries and the acreage. The Division used the AutoCAD file to verify the disturbed acreage. There were minor differences between the acreage listed on page 1-37 and the area calculated by AutoCAD. The Division assumes that part of the problem could be that the areas on Plate 5-6 were digitized from other maps that were used for area calculations. The Division does not consider the differences to be significant at this time. For consistency the Division will consider the acreage list on page 1-37 to be official acreage. The Division will verify the location of the disturbed area boundaries and acreage using a GPS system at a later time.

The Division noticed that the main mine disturbed area and the water tank disturbed area were not connected. Since waterlines and cables are buried beside the U.S.F.S. public stock trail the Division needs to know why the utility corridor was not included in the disturbed area boundaries. The Division reviewed the MRP and did not find any reason why the utility corridor was not included in the disturbed area boundaries. To the contrary on page 5-10 of the MRP the permittee states:

This road (East Side U.S.F.S. Public stock trail) has historically been used to herd livestock between grazing allotments during seasonal changes. SUFCo Mine also uses portions of this road to access the mining operation's electrical and water supply systems.

The permittee needs to either include the utility corridor in the disturbed area boundaries or state why that area should be excluded. One possible reason for excluding the area is that not additional work will be done in the area and during reclamation the water lines will be sealed from inside the disturbed areas and left in place. If the permittee wants to exclude the utility corridor from being in a disturbed area then they must state those reasons in the MRP.

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:

R645-301-121.200 and R645-301-521.163, The permittee must either include the utility corridor that connects the water tank area with the main mine site or show why the utility corridor is excluded from being in a disturbed area. See the analysis section for reasons why the utility corridor could be excluded from being in a disturbed area

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.

Analysis:

Affected area maps

The permittee revised the Plate 5-6 to show the location of all permit and disturbed area boundaries for the SUFCo mine with the exception of the waste rock site. The Division reviewed the map and an AutoCAD file found that they were adequate.

The Division reviewed Map 2, Underground Development Waste Disposal Site Plan in Chapter 3. The permit and disturbed area boundaries appear correct. However, the Division is unable to determine the location of the waste rock site from the map because it does not show references such as township, range and section, State Plane Coordinates or UTM. Without that information the Division is unable to determine the location of the waste rock site.

The permittee needs show the location of the waste rock site in terms of township, range and section, and State Plane Coordinates on Map 2. The permittee must also give the Division a copy of Map 2 in an AutoCAD file.

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, The permittee must show the location of the waste rock site on Map 2 of Chapter 3 in terms of township, range and section, and State Plane Coordinates.

R645-301-521.190, The permittee must show the location of the waste rock site on Plate 5-6 in terms of township, range and section, and State Plane Coordinates.

RECOMMENDATION:

The Division should deny the amendment until all deficiencies have been addressed.