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August 24, 2001

TO: Internal File

FROM: Stephen J. Demczak, Reclamation Specialist, Team Lead *SJD wjm*

RE: Sewer and Water System, Canyon Fuel Company, LLC., SUFCO Mine, C/041/002-AM01C

SUMMARY:

The SUFCO Mine has submitted an amendment to expand the capacity of existing culinary water system and sanitary drain field. These two upgrades to the water and sewer system will not require any increase in the US Forest Service Special Use Permit area, nor will the disturbed area change.

With an increase of production, the SUFCO Mine has hired twenty-five additional people and has worked extra days during the week. The present culinary water system at the mine site has a capacity of 20,000 gallons. The permittee wishes to expand the system to 40,000-gallon capacity by adding two 10,000-gallon tanks. The additional water capacity is needed to facilitate showers, disposal of sewage, dust suppression, and fire fighting capability.

The sewer system expansion is required due to the increase of shower water and sewage usage.

TECHNICAL ANALYSIS:

OPERATION PLAN

TOPSOIL AND SUBSOIL

Regulatory Reference: 30 CFR Sec. 817.22; R645-301-230.

TECHNICAL MEMO

Analysis:

Removal and Storage

The permittee stated that during construction of the leach field that the top layer of soil would be removed. The permittee must be more exact on the thickness and the amount of topsoil to be removed. A determination on the thickness of the topsoil removed will be needed.

The leach field is excavated and then is partially filled with gravel. What will happen with the excess soil from the excavation?

Findings:

The information provided is not considered adequate met the requirements of this section. Prior to approval, the permittee must provide the following in accordance with:

R645-301-230, The permittee must be more exact on the thickness and the amount of topsoil to be removed. The permittee must give an explanation on determining the thickness of the top layer of soil, which would be removed. The leach field is excavated and then is partially filled with gravel. The permittee needs to explain what will happen to the excess soil from the excavation.

VEGETATION

Regulatory Reference: R645-301-330, -301-331, -301-332.

Analysis:

The permittee will reseed the leach field area with the approved seed mix that is in the Mining and Reclamation Plan.

Findings:

The permittee has met the requirements for this section of the R645 Coal Rules.

HYDROLOGIC INFORMATION

Regulatory Reference: 30 CFR Sec. 773.17, 774.13, 784.14, 784.16, 784.29, 817.41, 817.42, 817.43, 817.45, 817.49, 817.56, 817.57; R645-300-140, -300-141, -300-142, -300-143, -300-144, -300-145, -300-146, -300-147, -300-147, -300-148, -301-512, -301-514, -301-521, -301-531, -301-532, -301-533, -301-536, -301-542, -301-720, -301-731, -301-732, -301-733, -301-742, -301-743, -301-750, -301-761, -301-764.

Analysis:

Exemptions for siltation structures

The present 0.280 acres leach field is classified as an Exempt Area. A SEDCAD computer program was ran to make the determination. This demonstration showed that vegetation, soil texture, and other parameters were adequate and that no sediment controls were required. With the expansion of the leach field, the area affected will not have established vegetation, thus, this affected area cannot be classified as an Exempt Area. This area must have Alternate Sediment Control until a SEDCAD program demonstrates that it meets the requirements of the R645 Coal Rules. Silt Fences, straw bales, and berms are several ways an ASCA area is treated.

Findings:

The information provided is not considered adequate met the requirements of this section. Prior to approval, the permittee must provide the following in accordance with:

R645-301-742, The permittee must provide sediment control for the areas disturbed due to the expansion of the leach field. The Mining and Reclamation Plan on Page 7-63 must be updated to reflect that this portion of the leach field is an Alternate Sediment Control Area. The permittee must change Page 7-75 to reflect that the new addition of the leach field is not calculated into the Small Area Exemption acres.

SUPPORT FACILITIES AND UTILITY INSTALLATIONS

Regulatory Reference: 30 CFR Sec. 784.30, 817.180, 817.181; R645-301-526.

Analysis:

The permittee has requested to expand the culinary and sewage systems capacities. The amendment proposes two additional 10,000-gallon water tanks and an additional 0.40 acres of leach field expansion. These additions are on the Extended East Spring Canyon Surface Facilities Map, Plate 5-2B.

Findings:

The proposed amendment has met the requirements of this section in the R645 Coal Rules.

TECHNICAL MEMO

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:

Mining facilities maps

The permittee has submitted an updated surface facilities map, Plate 5-2B showing the construction of two 10,000-gallon water tanks and 0.40 acres expansion of the leach field. This map is P.E. certified by Wesley K. Sorensen badge number #159457.

Findings:

This section of the proposed amendment meets the requirements of the R645 Coal Rules.

BONDING AND INSURANCE REQUIREMENTS

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

Analysis:

General

The bonding amount to remove the pump house is \$9,000, which is an increase of 0.2% of the current bond. The cost of removal is a small amount and no immediate change in the bond will be needed. The bond can be adjusted during permit renewal.

Findings:

The information submitted meets the minimum requirements of this section in the R645 Coal Rules.

RECOMMENDATIONS:

Prior to approval, the requirements of R645-301-742 and R645-301-230 must be provided as outlined above.