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DEPARTMENT OF NATURAL RESOURCES

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Technical Analysis and Findings
Utah Coal Regulatory Program

PID: C0410002
TaskID: 4767
Mine Name: SUFCO MINE
Title: VIOLATIONS RESPONSE

Operation Plan

Spoil Waste Refuse Piles

Analysis:

On November 20, 2014, John Baza, DOGM Director, sent the Permittee a "Findings of Fact, Conclusions of Law, and Order" for NOVs 13148, 13149, 13150, 13151, and 13153. Within the order, the Permittee was required to submit a map of topsoil storage piles 1A and 1B at a scale of 1"=25', that more clearly defined drainage structures.

The Permittee was also required to submit information showing that the pooled surface drainage and stormwater has been eliminated or conveyed to the sediment pond, and change the MRP text to correctly and accurately describe the future methods and configuration to convey future drainage to the sediment pond.

On December 18, 2014, the Permittee submitted an amendment to the MRP as a response to the order. The amendment contains the methods that will be used during waste placement to ensure proper slope and direction of runoff. The amendment also indicates that if ponding does occur, ponded water will be pumped to the appropriate ditch or directly to the sediment pond.

To address the order to demonstrate that the pooled water has been eliminated, a series of pictures was included that were taken over a four month period. Each of these pictures are used to demonstrate that there is not pooled water on the waste.

Figure 1 was added to Appendix V, that includes a more detailed map of drainage structures around the topsoil storage piles and subsoil pile.

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Spoil Waste Refuse Piles

Analysis:

On December 19, 2014 the Division received plans as required by the Division order dated November 20, 2014. This memo will include a review of that information.

NOV 13148:
If the expansion area was properly constructed at the outset water would probably not have been impounded and it is uncertain as to whether adding compacted refuse to the area below the needed grade can adequately convey drainage to the sediment pond. The revised text on page WRDS 3-1 is acceptable. The permittee should also identify where at the

mine this equipment is located since the waste rock site is at a remote location.

The application needs to include a certified map that clearly depicts the boundary of the of the .54 acre waste rock expansion area.

Drainage control structures will need to be implemented along the toe of the outslope at the south end of the waste rock expansion site to provide for adequate drainage from the outslope to the sediment pond as the lifts are constructed.

NOV 13150:

There are areas where topsoil is being eroded and not protected. As well the outslopes of the subsoil are not adequately vegetated (bare). The text on page 3-9, section 3.2.4 (Topsoil Handling) located in volume 3 of the MRP should include proposed language that describes topsoil protection measures for the topsoil/subsoil stockpile depicted in Appendix V figure 1.

Appendix V Figure 1 needs to be certified and show the location of the proposed topsoil protection measures.

Deficiencies Details:

R645-301-745 et. sec.

The revised text on page WRDS 3-1 is acceptable. The permittee should also identify where at the mine this equipment is located since the waste rock site is at a remote location.

The application needs to include a certified map that clearly depicts the boundary of the of the .54 acre waste rock expansion area.

Drainage control structures will need to be implemented along the toe of the outslope at the south end of the waste rock expansion site.

R645-301-234 et. sec.

Utah Code Annotated 1953 et. sec. 40-10-17(e)

NOV 13150:

The text on page 3-9, section 3.2.4 (Topsoil Handling) located in volume 3 of the MRP should include text that describes topsoil protection measures for the topsoil/subsoil stockpile depicted in Appendix V figure 1.

Appendix V Figure 1 needs to be certified and show the location of the proposed topsoil protection measures at the base of the topsoil stockpile.

The application needs to include topsoil protection measures for the disturbed topsoil located between the south end of the refuse pile expansion and the sediment pond.

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