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Technical Analysis and Findings

Utah Coal Regulatory Program

February 2, 2017

PID: C0410002
TaskID: 5344
Mine Name: SUFCO MINE
Title: WRS SITE COMPACTION SPECIFICATION

Operation Plan

Spoil Waste Coal Mine Waste

Analysis:

The application meets the requirements of R645-301-528.320 and R645-301-536 for Coal Mine Waste.

In September of 2015, the Utah Division of Oil, Gas, & Mining approved an expansion to the existing waste rock site, Task 4982. At that time the MRP included expanding the compaction specifications to include the material to be compacted to 95% of maximum proctor test. To maintain quality assurance a nuclear gauge was used to verify the compaction every 5,000 square yards per lift. The amendment seeks to establish a more site specific compaction measurement due to the lack of technical equipment on site, such as a nuclear gauge. The Permittee originally suggested an amendment to the compaction at the waste rock site under Task 5281 in October of 2016.

The application meets the requirements of R645-301-528.320 and R645-301-536 by removing the compaction specification of 95% of proctor in Volume 3, Chapter 5 Section 529, by updating lift placement to two foot lifts and random bi-monthly testing.

The MRP currently contains narrative explaining the construction, modification, use, maintenance of the proposed Coal Waste Rock Disposal keying into the existing Waste Rock pile specifically:

- Maps 2A through 2E show the topsoil/subsoil pile size as it will exist within the maximum disturbance at any given point of each phase to match the volumes shown in the tables on the top left of each corresponding map.
- The application shows the proposed operational map tying into existing contours on all sides.
- Map 4A through 5E show the approximate footprint area of each phase of the waste rock pile construction.

Chapter 5 Section 528 includes narrative explaining the basic cycle of how the waste will be conveyed to the site of the Coal Waste Rock Disposal. The general plans and construction of the proposed waste rock pile are detailed in Chapter 5 Section 530. The text describes how the waste rock pile site will have the foundation area prepared, stages of construction of the sequential phases 1 through 6 in the proposed waste rock areas and how the previous phase's area will be contemporaneously reclaimed.

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