

Simmons - DNR, Leigh <leigh.simmons@state.co.us>

Request for assistance: Review of compaction test reports

2 messages

Simmons - DNR, Leigh <leigh.simmons@state.co.us>

Tue, Apr 7, 2020 at 12:45 PM

To: "Cazier - DNR, Tim" <tim.cazier@state.co.us>

Cc: Jason Musick <jason.musick@state.co.us>, Michael Cunningham - DNR <michaela.cunningham@state.co.us>

Tim,

I'm requesting your assistance with the review of compaction test reports of coal refuse material deposited on the Refuse Pile Expansion East (RPEE) at the West Elk Mine.

Regulatory context

Coal mine operators are required by rule to submit quarterly reports of inspections of impoundments (4.05.9(17)), excess spoil fills (4.09.1(11)) and coal mine waste banks (i.e. refuse piles, 4.10.2(2)).

Site-specific context

The West Elk Mine has one active refuse pile, the Refuse Pile Expansion East (RPEE). The process flow at the mine is such that a portion of the coal produced passes through a preparation plant before being blended with run-of-mine coal to satisfy sales contract specifications. It tends to be the case that the coal at the eastern end of the E-seam longwall panels is of a relatively lower quality than that at the western end due to increased rock partings and greater ash content, which means a greater proportion of it passes through the preparation plant. The mine practices retreat longwall mining, and Map 51 shows the currently approved mine plan for E-seam mining - coal in the E-seam longwall panels is mined from east to west. The longwall miner is currently at the eastern end of the first panel in the sunset trails area, LW-SS1, (the attached photo was taken of the mine plan map during my inspection in early March).



The waste material from the preparation plant is transported by haul truck to the RPEE (in mid-winter, or when the haul road is very wet, the material is usually temporarily stockpiled on the surface of the Refuse Pile Expansion (RPE) Area first), before being spread by a dozer and compacted by a sheepsfoot compactor. Map 53 shows the layout of the main facilities, and Map 53C shows the approved extent of the RPEE.

The RPEE is discussed in general terms on Page 2.05-46 of the Permit Application Packet, and the detailed design is given in Exhibit 82 which is split into 13 separate documents in Laserfiche; the summary report by Barr Engineering gives compaction specifications on page 22.

Inspection reports from February and March will give you an idea of the current state of the RPEE.

Q1, 2020 report

As you can see, the RPEE is a significant structure, built in a steep drainage above State Highway 133 and the North Fork of the Gunnison River, and a considerable amount of material is currently being deposited on the pile. Compaction testing was carried out during Q1, and the results were provided to the Division with the quarterly report (see pages 1 and

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14-20 of the attached report). I'd like you to write a brief memo with your comments on the adequacy of the testing in the context of the rules and the permit requirements, and your conclusions based on the results provided.

There is no statutory deadline associated with the review, but since new refuse is being deposited all the time that mining is in progress it would be helpful to have your comments sooner rather than later.

Thanks, Leigh

Leigh Simmons Environmental Protection Specialist



COLORADO Division of Reclamation, Mining and Safety Department of Natural Resources

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Q1 2020 report attached

Leigh Simmons Environmental Protection Specialist

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