



DIVISIONS
ENERGY
GAS AND OIL
GEOLOGY AND MINERAL RESOURCES
MINED LAND RECLAMATION
MINERAL MINING
MINES
ADMINISTRATION

COMMONWEALTH OF VIRGINIA

Department of Mines, Minerals and Energy

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MEMORANDUM

TO: Golden Pond Gob Pile Removal Project File

FROM: Gavin M. Bledsoe, Reclamation Services Manager
Lesa C. Baker, Abandoned Mine Land Projects Coordinator
Gregory F. Baker, Reclamation Program Manager
Phillip C. Mullins, Chief Engineer

RE: Determinations and Findings for Government Financed Construction Project; AML Enhancement

DATE: October 16, 2018

The FY2018 Golden Pond Gob Pile Removal Project (Site No. 18302) is located off State Route 615, along Dumps Creek, south of South Clinchfield in Russell County, Virginia. The Division of Mined Land Reclamation will accomplish this project as a government financed exemption project. The project will involve complete removal of a large gob pile and backfilling the areas for industrial development. The project area is contained within the South Clinchfield Problem Area, VA-0821.

The Virginia Department of Mines, Minerals and Energy (DMME), through its Division of Mined Land Reclamation will contract with Russell County Reclamation LLC to accomplish the project. DMME's financial contribution to the project is estimated to be less than 50 percent of the project's costs. The government financing will be the project's revegetation costs realized by the Division's Abandoned Mine Land Services Section. This type and level of funding allows DMME to consider the project as government financed construction under 4 VAC25-130 Part 707.

The "Golden Pond", is a 32 acre AML gob pile site (mapped as a Tailings Pond) and it is AML eligible. The initial Chapter 19 permit application for Clinchfield Coal Company (Moss 3) Permit Number 1300481 (issued 12/29/1983) notes the area as Pond 7. "The sediment control structure designed as Pond 7 (Sediment basin No 7 in Virginia DMLR Permit Number 2607-U) in the surface drainage plan for the Moss No. 3 Preparation Plant was completed by November 1980." Permit 2607-U was permitted to Clinchfield Coal Company on 8/07/78. Virginia primacy date is December 15, 1981. All mapping both current and historic does not show any evidence this structure has been affected by a Title V permit. The permit was transferred to Russell County Reclamation LLC, Permit Number 1302253 on 4/2/18. The permittee deleted Pond 7 or the "Golden Pond" feature from the permit, effective June 5, 2018. This 32-acre gob pile has had no recovery

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interest from the adjacent preparation plant for the many years of its existence. This removal project could be the last chance to remove this gob area.

There is no continuing responsibility for any individual, firm, or organization to reclaim this site.

Over the past twenty years, DMME has made a concerted effort to eliminate abandoned mine related sediment from entering the Guest River. DMME's work has been accomplished through routine AML projects and also through partnership efforts with the Guest River local watershed group, Lonesome Pine Soil and Water Conservation District, and the Upper Tennessee River Roundtable. Complete removal of the pile will be another effort to eliminate AML sediment from the stream.

Incidental coal recovered during the complete removal of the pile will be trucked to Dominion's Virginia City Hybrid Energy Center near St. Paul. The gob product from the Golden Pond Gob Pile project would be blended with high Btu coal to produce a fuel source for the power plant. Many other gob piles have provided fuel for the power plant. DMME has realized tremendous cost savings through reclaiming these piles under the AML enhancement rule.

DMME would accomplish reclamation of the Golden Pond Gob pile through complete removal of the pile. Unmarketable material would be backfilled and covered with suitable material then seeded.

It must be highlighted that permitting this gob pile would not ensure abatement of the AML hazards. Under a permit, a company could only mine the profitable area of the pile, leaving the remainder as abandoned mine lands that would continue to have combustion potential. Further, any permitting of the pile would complicate AML eligibility determinations.

In order to accomplish the Golden Pond Gob Pile Removal project, we have consulted and made the following determinations:

1. There is little likelihood of coal being mined at a site under a Title V permit. This determination takes into account information including
 - ❖ The gob pile has been in place for over eighty years and has not been permitted for coal surface mining and reclamation operations.
 - ❖ Paramount Coal Company Virginia, LLC operates a coal preparation plant a few mile from the pile. In over thirty years, Paramount hasn't made efforts to mine and reprocess this pile. DMME personnel believe the costs associated with permitting and reclaiming the site as Title V operation far exceed any profits that could be realized through reprocessing the pile.
 - ❖ There are no gob pile reprocessing operations in the area.
 - ❖ The pile's size makes this a difficult operation to recover or mine.
2. There is little likelihood that nearby or adjacent mining activities might create new environmental problems or adversely affect existing environmental problems at the site. This determination takes into account information including:

- ❖ The project site is isolated.
 - ❖ Coal mining in areas nearby or adjacent to the project is conducted under permanent program regulations that protect and enhance environmental features.
 - ❖ Coal reserves in this area are largely mined out.
3. There is little likelihood that reclamation activities at the site might adversely affect nearby or adjacent mining activities. This determination takes into account information including:
- ❖ The Gob removal activities will be coordinated with Russell County Reclamation LLC PN 1302253 and (Pilot 2017) Project Reclaim #91706.
 - ❖ The reclamation project would implement effective environmental safeguards.
 - ❖ There is no history of acidic or toxic material with this pile and associated strata.

In consideration of the findings and determinations referenced above, we make the following recommendations:

1. The Golden Pond Gob Pile Removal Project will be accomplished as a government financed construction project.
2. Incidental coal recovery is not likely to occur during project excavation and this recovery however if it is the site will be exempt from the requirements of the Virginia Coal Surface Mining Control and Reclamation Act of 1979. The most successful and permanent reclamation alternative is to totally remove the pile and dispose of the unmarketable material on previously mined lands to eliminate AML features. Gob material will be removed from the pond in several increments and coal removal would be limited to the incidental coal that could be recovered as the gob pile material is removed to natural ground. The limits of gob removal and incidental coal recovery will be limited to that area shown on the attached map. Coal that is not directly associated with gob will not be removed from the project site.
3. Proceeds from the incidental coal extraction will go to offset the project reclamation cost. The gob removal will ultimately create the site for Project Reclaim that will develop an industrial site to support economic development in Russell County.

In stating the above recommendations, we concur to the following determinations:

1. The boundaries of the Golden Pond Gob Pile Removal Project and limits of incidental coal extraction are the boundaries shown on Attachment A.
2. A listing and status of mining permits adjacent or near the Golden Pond Gob Pile Removal Project is shown on Attachment B.
3. Typical sections of the pile and disposal area are shown on Attachment C.
4. Total removal of the pile is an engineering necessity to achieve the successful and permanent abatement of the abandoned mine land features. Coal recovery through reprocessing and proper refuse disposal will occur.
5. Prior to commencement of reclamation activity, the Division will have specific plans and specifications for the project. The project will be conducted in accordance with the provisions of 30 CFR Subchapter R. The Division will also

ensure that the project contractor provides the Division with documents that clearly authorize the extraction of coal and payment of royalties.

Lesla C. Baker Lesla C. Baker [Signature]
Abandoned Mine Land Projects Coordinator Reclamation Program Manager

[Signature] Phillip C. Mullis
Reclamation Services Manager Chief Engineer

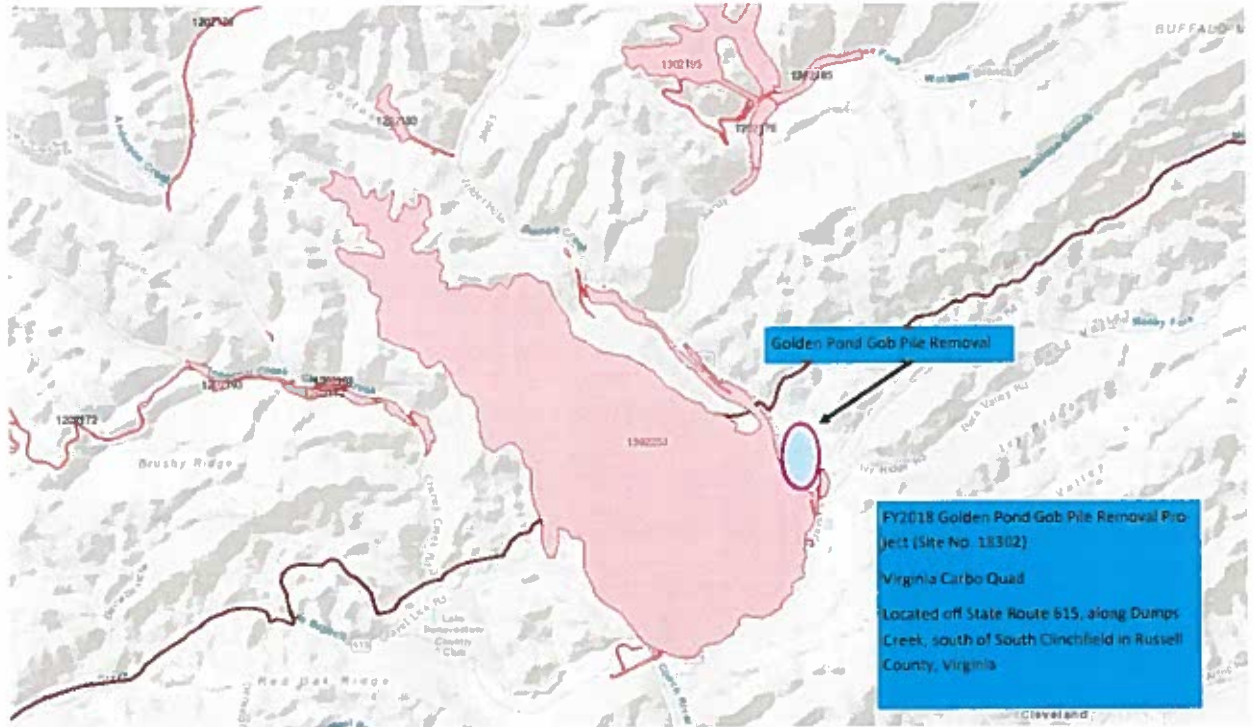
[Signature] Approve Disapprove
Division Director 10/16/18
Date

Attachment A
Golden Pond Gob Pile Removal
Project limits in red

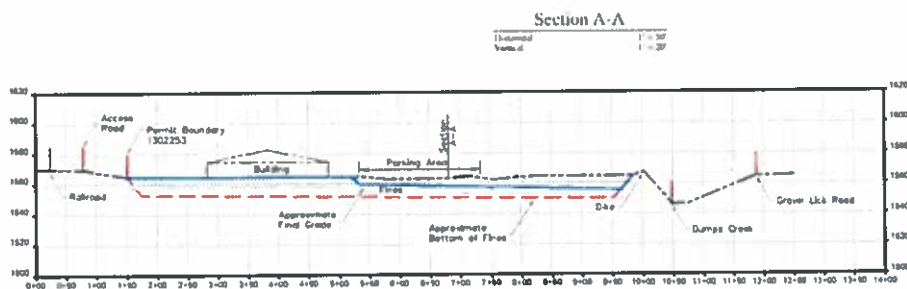
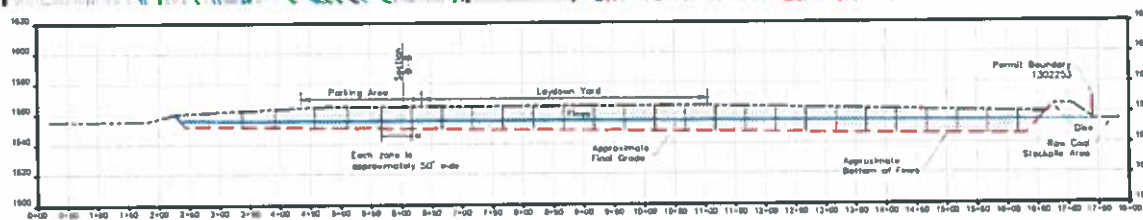
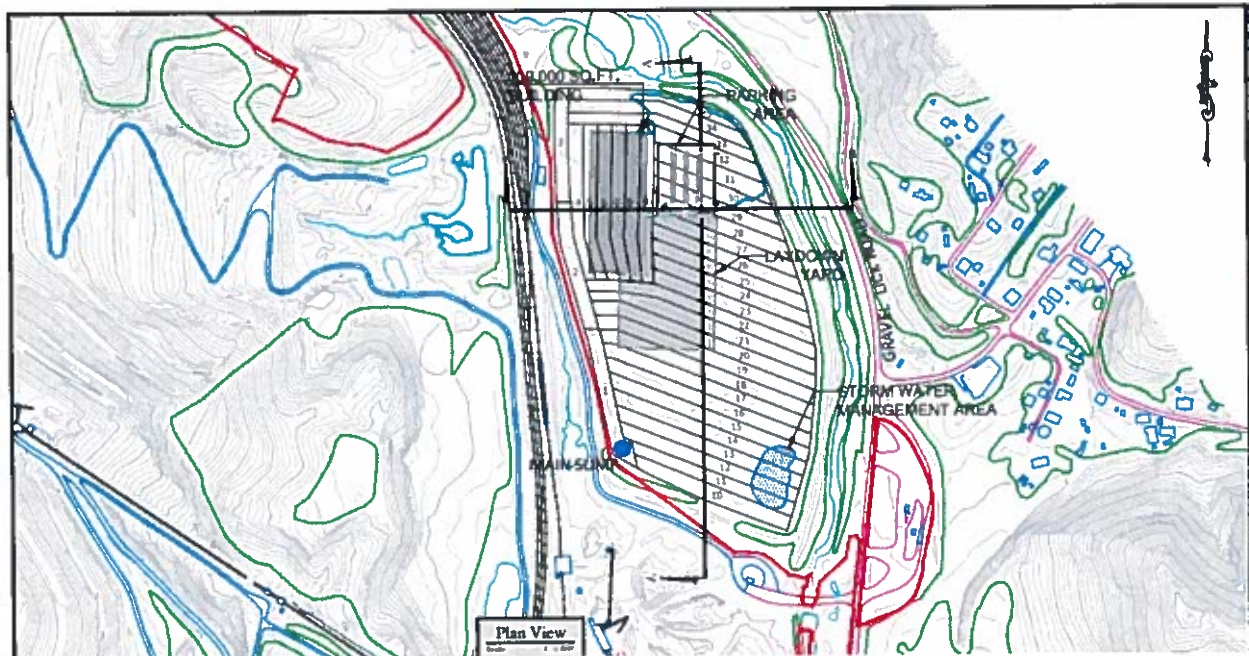


Attachment B
Golden Pond Gob Pile Removal
Adjacent permits

Russell County Reclamation 1302253; coal preparation and refuse disposal; in active status.



Attachment C Golden Pond Gob Pile Removal Typical sections



PSTI

7.5 MINUTE QUADRANGLE

Permet County Restoration, LLC Golden Pond Restoration Plan	
Date: 11/15/2011 Drawn: 11/15/2011 Scale: A-1 Sheet: 01 of 01	11/15/2011