

THE VALLEY CAMP COAL COMPANY

0004

Scofield Route
Helper, Utah 84526

Route # File 1w.
Valley Camp Belina #1
KMD

AS JWS
MAN K ACT 1007/01

W. H. HAYNES, JR.
PRESIDENT, WESTERN DIVISION

GENERAL OFFICES
700 WESTGATE TOWER
CLEVELAND, OHIO 44116

June 15, 1979

Mr. Murray T. Smith
Federal Lands Coordinator
U.S. Department of the Interior
Office of Surface Mining
Reclamation and Enforcement
Post Office Bldg., Room 270
1823 Stout Street
Denver, Colorado 80202



Re: Region V On-Site Inspection
Valley Camp of Utah, Inc.
Belina #1 Mine
April 16 & April 19, 1979

Dear Mr. Smith,

We have received your letter of June 4 transmitting the referenced report of on-site inspections. We feel that clarification of certain facts relating to our operation is necessary, as they were mis-understood or mis-constructed as stated in your report.

We ask that you first note that the first day's inspection took place as indicated between the hours of 4:30 - 7:30 p.m. Our normal office hours, during which time we have personnel available knowledgeable in permitting, environmental and reclamation activities, are 8:00 a.m. to 4:30 p.m. Your people arrived on the 16th as we were closing our office for the day. We were informed that the visit was for general familiarization of the area, not constituting an inspection, and that it was not necessary that your people be accompanied by Valley Camp personnel to guide or answer questions. The mis-conceptions as later stated in subject report may have been avoided had your people asked questions of knowledgeable Valley Camp personnel, either on this first day or the second day's inspection on the 19th, when accompanied by Valley Camp personnel. We feel it particularly important that your reports of inspection should accurately reflect facts as they exist.

Under your General Comments, for clarification, we are presently operating our Belina No. 1 mine, located in Whiskey Canyon, a tributary to Eccles Creek. The coal is transported by truck to our Central Coal Storage and Train Loading Facilities. At the Central Facilities we also have an inactive mine, Utah No. 2, currently shut down and sealed. The Belina No. 1 Mine, in the Upper O'Connor Seam, has not been mined extensively as you state, but is in early development, having commenced operation

in 1976. The Lower O'Connor Seam at this site is not being developed, as you state. We currently have no specific plans for the timing of commencement of development in the Lower O'Connor Seam. This Mine would be designated Belina No. 2. Production from the Belina No. 1 Mine is presently at a rate of 480,000 tons per year. The reserves associated with Belina No. 1 Mine include not only Federal leases, but also Carbon County leased coal.

In regard to your comments relating to compliance with Interim Regulations, we offer the following clarification, captioned as your paragraphs:

717.11 - The mining and reclamation plan for the Belina No. 1 Mine was approved by State Regulatory Authority on October 8, 1976. The mining and reclamation plan for conduct of operations on Federal leases was approved February 10, 1977.

717.14 & 717.15 - The stated need for regrading the slope above the active mine portals is not clear to us. We plan to supplement the vegetative planting at an appropriate time. Snow melt and run-off from this slope was and is diverted and channeled to the sediment and filtration pond installed and operating. On the day of the inspection, thawing of a spring of ground water on the cut slope between the upper and lower work levels had resulted in a mud slide. This ground water was continuing to flow at the time of the inspection, but has since been diverted.

717.17 - Surface water at a number of sample points about the area is monitored and sampled on a regular basis. Our mine water discharge is monitored and sampled on a regular basis pursuant to our approved NPDES permit, not as you stated in your report. This sample is collected from the discharge outlet of our sediment-filtration pond, which you apparently do not understand at all. Your statement that the system was short-circuited and totally ineffective is totally false, and reflects a clear mis-understanding of the system. We would be pleased to explain its operations upon subsequent inspections.

The steam channel diversion authorization was covered in our original plan approvals by State and Federal agencies.

It is Valley Camp's intent to comply fully with your applicable regulations. Considerable effort has been given to the necessary work for compliance. We are anxious to work with you in any way we can, and are most anxious to clarify questionable fact situations relating to our operations.

If we may answer further questions, please call on us.

Yours very truly,


W. H. Haynes, Jr.

whh:vy

cc: Mike Thompson, Utah State Oil & Gas Board