

envirosphere company

A Division of EBASCO SERVICES INCORPORATED



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July 16, 1982

0017

Ms. Sarah Bramson
Office of Surface Mining
Brooks Towers, Second Floor
1020 - 15th Street
Denver, CO 80202



RECEIVED

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**DIVISION OF
OIL, GAS & MINING**

Dear Ms. Bramson:

Re: Apparent Completeness Review of the MRP for the Belina Mine Complex,
Valley Camp Coal Company, Carbon County, Utah

Envirosphere has completed the Apparent Completeness Review (ACR) for the Mining and Reclamation Plan for the Belina Mine Complex of Valley Camp Coal Company in Carbon County, Utah. The ACR was accomplished using the Utah Division of Oil, Gas and Mining (DOG M) ACR letter of October 20, 1981, and Valley Camp's responses to this letter of May 18, 1982. We have found that in most cases the MRP is now apparently complete. However, a few deficiencies still need to be addressed by Valley Camp. These deficiencies are detailed in the attached report.

Several previous submittals to DOGM were referenced in Valley Camp's response to the ACR. EnviroSphere needs copies of these reports in order to complete the ACR. These submittals are as follows:

- ✓ (1) Letter of September 11, 1981 from Valley Camp to DOGM, Re: *Tom's copy*
Sedimentation Ponds - Design Stipulation 6-81-3.
- ✓ (2) Coastal States Permit Application. *at OSM*
- ✓ (3) Compliance survey of the Valley Camp mine area by Vaughn Hansen *file*
Associates, October 1978.
- ~~✓~~ (4) *noting* Stipulation response by Valley Camp to DOGM on November 30, 1981 on *File Copy*
road drainage and discharge structures.
- (5) Proposals for structure revision of the mine discharge filtering pond
submitted to DOGM on *attached* July 24, 1981, November 17, 1981 and May 17, 1982.

The following sections cannot be fully reviewed for completeness until these reports are studied: UMC 783.16, UMC 783.18, UMC 784.12, UMC 784.14, UMC 784.16, and UMC 784.24.

Based on Valley Camp's responses to the Utah DOGM's apparent completeness review, we find the MRP to be apparently complete with respect to the following sections of the Utah permanent program as addressed in DOGM's ACR: UMC 782.13, UMC 782.18, UMC 782.19, UMC 782.21, UMC 783.15, UMC 817.52, UMC 817.46, UMC 817.47, UMC 817.48, UMC 783.22, UMC 783.27, UMC 784.11, UMC 784.13 (Soils), UMC 784.13(3) (Backfilling and Grading), UMC 784.26 and UMC 785.19.

The ACR associated with cultural resources and socioeconomics is to be completed by OSM. Thus, EnviroSphere has determined that the response to paragraph 1 of the DOGM questions on UMC 783.12 is apparently complete, but we

Ms. S. Bramson, OSM
July 16, 1982
Page 2

have not reviewed completeness of the remainder of this response which deals with cultural resources. We have also not reviewed the response on socioeconomics which follows the the response to UMC 785.19.

Our apparent completeness review has been based primarily on the ACR by the Utah DOGM of October 20, 1981 and is thus keyed primarily to the Utah permanent program regulations. The deficiencies noted in the attached report need to be corrected to provide a complete MRP. Based on our review of the OSM's permanent program requirements in Subchapter D, Federal Register, March 13, 1979 and subsequent revisions, we believe that the correction of the above noted deficiencies will also make the MRP complete for OSM purposes. It is also noted that OSM concurred with Utah DOGM's ACR on September 9, 1981.

We will await the applicant's response to these deficiencies, before proceeding further with this project. Upon receipt of the applicant's responses we will complete the ACR. If you have any questions, please call.

Yours truly,



Robert S. Lytle

RSL/slr

APPARENT COMPLETENESS REVIEW
BELINA COMPLEX
VALLEY CAMP OF UTAH, INC.

- (1) The applicant's response to UMC 782.14 must include the identity of the division issuing a violation notice and the applicant's action taken to abate the violation.
- (2) The applicant must submit the report prepared by Gates Engineering Company that was to be completed on July 1. This report will be used to evaluate the apparent completeness with respect to UMC 783.14.
- (3) In order for the response to UMC 783.19 to be complete, Map G should specifically delineate areas to be disturbed by this operation. The present map only shows the vegetation types in the area, not the specific areas and vegetation types that will actually be disturbed. The acreages of vegetation communities to be disturbed must also be calculated and provided in numerical form.
- (4) The response to UMC 817.97 is deficient in several respects. The applicant has not provided a map delineating key wildlife areas as required by DOGM in paragraph 1 of the ACR for this section. We do not concur with Valley Camp that the section on UMC 784.21 commits to the mitigating measures proposed by DWR. A specific statement of commitment should be made. No support for the statement regarding goshawks and Cooper's hawks ability to withstand considerable human impact was provided. This must be provided as requested by DOGM.
- (5) The applicant should provide the maps of the portal and load-out areas which he states would be prepared as soon as snow cover melts. Calculations of yardages and acreages involved should be provided, as well as delineating the areas on the maps. This information is required to judge the apparent completeness in regard to UMC 784.12 (Reclamation Plan: General Requirements). Assumptions that are included in the calculations and sources of unit costs should be specifically stated.

The applicant refers to Section 783.14 in answer to questions in DOGM's paragraph 3 regarding conservation of the coal resource. This information should be provided either in the forthcoming Gates Engineering report or as a separate response. The present information is inadequate. The applicant has also not committed to notifying the USGS prior to abandoning underground operations or portals. This must be specifically stated.

- (6) In response to inadequacies noted by DOGM in regard to UMC 784.13 (Revegetation), the applicant stated that as soon as snow cover melts the disturbed areas would be mapped and a response and plan would be prepared. This response to DOGM's ACR should be submitted for review of apparent completeness.

APPARENT COMPLETENESS REVIEW
BELINA COMPLEX
VALLEY CAMP OF UTAH, INC.
(Continued)

- (7) The applicant must supply the reasoning and support for land use changes as requested by DOGM in paragraph 3 of its ACR of UMC 784.15. The applicant also must provide details of his maintenance plan for the drainage system.
- (8) In response to DOGM's questions in paragraph 1 on UMC 784.16, Union Camp seems to indicate that the emergency spillway of the #4 dam will serve as the lower end of an overflow diversion ditch in the post-mining period. This ditch appears to be a permanent structure. Please state whether this is the case. If so, also provide design data for this ditch for the post-mining period and provide details of its proposed operation, including a drawing of the inlet configuration, in relation to the culvert.
- (9) The engineering drawing provided in the Golder Associates report (Appendix A) are not certified by a professional engineer as requested by DOGM in its ACR of UMC 784.19.
- (10) In regards to the ACR of UMC 784.20, the applicant should provide letters from the surface managing agency and the surface owners to verify that subsidence would not cause material damage or diminution of value or reasonably foreseeable use of lands. This was previously requested by DOGM. The applicant must also provide a description of the measures to be taken to mitigate material damage or diminution of value or reasonable foreseeable use of lands, if it should occur, due to subsidence pursuant to UMC 784.20(C) and UMC 817.124.
- (11) The applicant's response to DOGM's ACR comments on Section UMC 784.21 are incomplete. As noted in item (4) above, the applicant has not provided a definitive statement of commitment to the DWR wildlife protection plan. The applicant must either make this commitment or provide its own thorough plan of appropriate mitigation measures. Such a plan is not presently included in the MRP. The applicant must also provide support for the statement regarding goshawks' and Cooper's hawks' ability to withstand human impact.
- (12) The applicant states in response to DOGM's ACR on UMC 784.22 that the 42" culvert on the Whiskey Canyon drainage will not be removed and will be a permanent structure. The applicant should provide information on the proposed maintenance of this culvert in the post-mining period, means of preventing it from becoming a public safety hazard (i.e. a 42" CMP is large enough to be entered by children) and the inlet configuration and its relationship to the overflow diversion channel. Longitudinal (not cross-sectional as currently provided) profiles of the culvert and diversion channel should also be provided. These profiles should show any drop structures or other velocity control structures.