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**envirosphere
company**

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A DIVISION OF EBASCO SERVICES INCORPORATED

December 10, 1982

Ms. Sarah Bransom
Office of Surface Mining
1020 - 15th Street
Brooks Towers, 2nd floor
Denver, CO 80201

1, 2, 3

Dear Sarah:

Re: Final Apparent Completeness Review
Belina Complex MRP, Valley Camp of Utah

Enclosed is the final Apparent Completeness Review (ACR) for the Belina Complex MRP submitted by Valley Camp of Utah. This ACR includes a review of all material submitted by Valley Camp through its November 9, 1982 addendum. The primary items still judged incomplete are related to the geology description being prepared by Valley Camp's consultant which is still unfinished and the aerial mapping which has not yet been undertaken. We have not determined completeness for portions relating to socioeconomics or cultural resources since these are to be done by OSM.

If you have any questions, please call. We will await your directions regarding further work on this project.

Sincerely,

Robert S. Lytle
Robert S. Lytle

cc R. Carpenter (w/attach)
J. Lovell "



United States Department of the Interior
OFFICE OF SURFACE MINING
Reclamation and Enforcement
BROOKS TOWERS
1020 15TH STREET
DENVER, COLORADO 80202

December 16, 1982

Thomas Tetting
State of Utah
Division of Oil, Gas and Mining
4241 State Office Building
Salt Lake City, Utah 84114

RECEIVED
DEC 20 1982

DIVISION OF
OIL GAS & MINING

Dear Tom:

Enclosed are two copies of EnviroSphere's review of Valley Camp's latest submission to the ACR. As you can see, EnviroSphere has consolidated their review of all of the materials up to November 9, 1982.

Please call me if you have any questions or concerns on the enclosed materials.

Sincerely,

Sarah E. Bransom
Technical Project Officer

APPARENT COMPLETENESS REVIEW

BELINA COMPLEX

VALLEY CAMP OF UTAH, INC.

UMC 782.13 - Identification of Interests

In response to comments on UMC 782.13, the applicant has submitted all names, titles and addresses of surface property and coal owners affected and contiguous to the permit area (see pp. 1-1C) and has thus completed this section of the MRP.

UMC 782.14 - Compliance Information

The applicant has provided the information required to complete UMC 782.14, including the date of issuance; a brief description of the violation; the date, location and type of any proceeding, and the current status of violations, and the agencies issuing violation notices.

UMC 782.18 - Personal Injury & Property Damage Information

Section UMC 782.18 is apparently complete. The applicant has provided a copy of the insurance certificate (p. 3A) which shows that it is, in fact, in force for the underground coal mining activities. The policy also shows a rider requiring the insurer to notify the DOGM whenever substantial changes are made in the policy.

UMC 782.19 - Identification of Other Licenses & Interest

The response to UMC 782.19 completes this section of the MRP. As requested on page 4, the applicant has provided a revised permit listing which includes license numbers and/or current status and other relevant information, and a description of water rights (see pp. 4A-I).

Pursuant to USGS comments, the applicant has supplied a description of the Roof Control and Ventilation System, and Methane and Dust Control Plans in Appendix B. This description appears to be complete.

Appendix A includes the Golder Associates report which describes the underground waste structure design and construction and appears to be complete. The applicant states that "No MSHA approval is required." (p. 4).

Finally, on page 41, the applicant lists the lease agreement with the Alpine School System for the supply of culinary water, and thus completes this section of the MRP.

UMC 782.21 - Newspaper Advertisement & Proof of Publication

In response to comments on UMC 782.21 (p. 5), the applicant has corrected all errors in the description contained in the advertisement (see p. 5A) and plans to readvertise as required (p. 5). Therefore, this section is apparently complete.

UMC 783.12 - General Environmental Resources Information

The apparent completeness review of cultural resources and socioeconomic information is to be completed by the OSM. EnviroSphere has determined that the response to paragraph 1 (p. 6) of the comments by the DOGM is apparently complete. The applicant has provided the size, sequence and timing of subareas of the mine plan area, in 5-year increments, for the life of each mine (Appendix C; Maps E1-0005 & E2-0006) pursuant to UMC 783.12(a). The applicant has also provided the mine layout (Maps E1-0005 & E2-0006) and forecast of production in 5-year increments for the life of the mine (p. 6C), as required by the USGS.

EnviroSphere has not reviewed the completeness of the remainder of this response which deals with cultural resources. As previously mentioned, the portion of section UMC 783.12 which has been reviewed by EnviroSphere is apparently complete.

UMC 783.14 - Geology Description

The applicant has not, as yet, completed this section. The applicant's response to DOGM comments was that Gates Engineering Company was retained to supply the geologic information needed. This information was to be submitted after July 1, 1982 and is required for the determination of apparent completeness.

UMC 783.15 - Ground Water Information

The applicant has responded, in part, to the request for additional information on well completion in paragraph 1. Drillers logs for the Whiskey Canyon well and the Alpine well were provided in Appendix E; however, logs for the Upper Eccles and Lower Eccles wells were drilled by Coastal States Energy Company and logs are not available (p.8A) for inclusion in the report. On page 8A the applicant indicates the above mentioned wells were the only wells sampled and that no periodic depth-to-water levels are available for the wells. This part of section 783.15 is as complete as is currently possible.

In response to paragraph 2, the applicant has responded to the request for information on how the water table surfaces were developed by referring to Plate 6, Groundwater Contours, of the Vaughn Hansen report, and cross sections on maps F-1 and F-2.

The applicant has adequately responded to the question of relative flow rates of springs as related to the extent of recharge (p. 8B).

The applicant's response to the request for information in paragraph 3 on the computation of groundwater discharge to Eccles Creek is to refer to the discussion in the Vaughn Hansen report, pages 61-65, which adequately details the procedure used in the calculation.

The applicant has adequately delineated the location of the Alpine well, and has referred to a discussion in the Vaughn Hansen report, pages 55-61, in regard to their conclusions on the groundwater system. This part of UMC 783.15 is complete.

The applicant has adequately responded to the request for information on the effects of mining on the groundwater system and has provided a discussion of information relating to existing mine discharges on pages 8b and 8c to satisfactorily complete this part of UMC 783.15.

In response to questions in paragraph 7, the applicant has clarified the status of the monitoring program by referring to the discussion in the Vaughn Hansen report, pages 49-52 and 89-91, and has provided updated information requested. This part of UMC 783.15 is complete.

UMC 783.16 - Surface Water Information

The applicant has previously submitted the information necessary for completion of this section as indicated by the copy of a transmittal letter to the DOGM, dated September 11, 1981, found on pages 13A and 13B. This

information includes the Vaughn Hansen Associates report and the Golder Associates report; these reports adequately describe the hydrology of the mine plan area. A hydrology map of the Belina mine is presented in Figure 3-2 of Appendix A, as requested in the comments on page 13, thus completing this section of the MRP.

UMC 783.18 - Climatological Information

The applicant has provided by reference data for wind speed and wind direction. These data are provided in the Coastal States Energy Company and Getty Mineral Resources Company's Skyline Coal Mining Project MRP (1979). A general discussion of the area's climatology is provided in Volume 1 (Climate, Section 2.6). Details of the monitoring program and data for the period January 1 through August 31, 1979 are presented in Volume A-4. With this information, this section is determined to be apparently complete.

UMC 783.19 - Vegetation Information

The applicant's response to UMC 783.19 is not entirely complete. Page 15A, paragraph 1, does not provide actual acreages of vegetation communities; and page 15, paragraph 8, and Map G do not delineate specific vegetation types that will actually be disturbed. The applicant does state that disturbance to vegetation communities will not exceed 0.5 acres (revised page 15A).

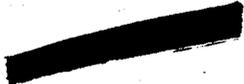
The information provided in the report by Endangered Plant Studies, Inc. (pp. 15B-M) includes analyses of vegetation types in the affected area and reference areas, descriptions of sampling methodologies and adequacy, and clarification of minor discrepancies; thereby completing the information requested of the applicant regarding these topics.

UMC 783.22 - Land Use Information

The applicant's response to UMC 783.22 is considered to be complete. The applicant plans to return disturbed areas to pre-law land use; with the Belina portal upgraded to recreational use, or to the landowners' desire as a cattle holding facility. These uses are expected to preclude wildlife use (see p. 17).

UMC 783.27 - Prime Farmland Investigation

The response to UMC 783.27 is considered to be complete based on the statements provided by the applicant and the Soil Conservation Service, shown on pages 18 and 18A, stating that the permit area does not fulfill the requirements for determination as a prime farmland.

UMC 784.11 - Operation Plan: General Requirements 

The response to comments on UMC 784.11 is not entirely complete. The applicant has identified the size of the trucks in use as 25 ton bottom dump trailers pulled in tandem, or 30 ton trailers pulled individually. Due to the moisture content of the product, coal dust emissions have not been a problem, and spillage control is obtained by maintaining loads which will not spill over the trailer top (p. 19).

The applicant states that a specific conveyor design has not been completed; however, the applicant states that the conveyor line will be placed at least three meters above ground and will therefore provide adequate passage for wildlife and will not require drainage modifications (revised page 19). Prior to initiating construction activities, the applicant will provide all design specifications for the conveyor, with submittal to the DOGM in sufficient time for review and approval (revised page 19).

UMC 784.12 - Existing Structures

The applicant has provided the mine layout and forecast in Appendix C and on page 6 to demonstrate apparent completeness with regard to paragraph 1 of the DOGM comments.

In response to questions in paragraph 2 of DOGM's ACR the applicant has referenced the Vaughn Hansen Associates compliance survey of October 1978 and a stipulation response for Belina #2 in November 1981. A review of these reports indicates that they adequately address DOGM's comments in paragraph 2. This section is now apparently complete.

The applicant has submitted certification letters from Mr. Phillips, P.E. and Mr. Foust, P.E., and has thus adequately responded to paragraph 3 of the comments from the DOGM.

UMC 784.13 - Reclamation Plan: General Requirements

The response to UMC 784.13(a)(2) does not completely address the questions brought forth by the DOGM. The applicant does not adequately address the request for additional information and recalculations of the data in Appendix A (see pp. 21-21A). 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 784.13. Assumptions that are included in the calculations and sources of unit costs should be specifically stated. As requested on page 21, paragraph 3, and pursuant to the USGS (211 Plan) and UMC 784.13(b)(6), a narrative must be provided detailing the specifics of recovery and conservation of the resource. 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.

There is no statement of intent to notify the USGS prior to abandonment of operation or portals.

The applicant has provided estimations of removal costs (p. 21A) as requested on page 21, paragraph 2.

The MRP cannot be considered complete until all information requested in UMC 784.13 has been adequately addressed.

UMC 784.13 - Soils

The applicant's response to comments on UMC 784.13 (Soils) is apparently complete. The applicant has submitted revised soil analysis data to include the soil map units "r", "t" and "u" (pp. 22B-D) pursuant to UMC 817.21, therefore the response to paragraph 1 is complete.

The applicant states that no topsoil has been removed or stored at the Utah #2 and Belina sites since these areas were pre-law (p. 22A). Thus no further discussion is provided or required for these areas.

The applicant also states that with the exception of the conveyor belt route, no additional disturbance is planned (22A). Revised page 19 describes

disturbances to be caused by the conveyor and plans to submit detailed specifications to the DOGM prior to initiation of construction activities.

The applicant's response (p. 22A) to comments on the slope stability comments is complete.

UMC 784.13 - Revegetation

On page 23A the applicant states that disturbed areas will be mapped and responses to comments on regulation UMC 784.13(b)(5) will be submitted as soon as practicable after snowmelt. Apparent completeness cannot be reviewed prior to receipt of these documents.

UMC 784.13 - Backfilling & Grading

The applicant has supplied the Golder report (Appendix A) and a postmining contour map for the Belina area (Appendix F). A postmining contour map for the Utah #2 load-out site is being constructed as indicated in the comments on page 24. Section 784.13 (Backfilling and Grading) cannot be considered complete until the Utah #2 map is submitted and reviewed.

UMC 784.14 - Reclamation Plan: Protection of Hydrologic Balance

The applicant states that Utah #2 mine does not have gravity drainage in response to DOGM's question in paragraph 1.

The applicant has responded to the comment on paragraph 2 completely. The total embankment height is 20 feet. However, the storage height as measured from the upstream toe of the embankment to the crest of the spillway (see 30CFR 817.46q) is only 18 feet, therefore it is not necessary to meet the requirements of 30CFR 77.216(a)(1) or (2).

The applicant has modified the inlet structure with riprap to stabilize the fill as shown on revised Map D-1 and Appendix F. This response adequately addresses the comments in paragraph 3.

The applicant has provided data from groundwater quality samples in Appendix E in response to DOGM request and to support their contention of beneficial impacts.

The applicant stated that the necessary information on the mine discharge filtering pond had been provided in submittals to DOGM on July 24, 1981, November 17, 1981 and May 17, 1982. A review of this information indicates it is complete. We, therefore, have determined this section to be apparently complete.

The applicant has provided adequate information on the monitoring of the mine discharge (p. 25A).

The applicant has completely responded to the comment in paragraph 6 by clarifying the nature of the downward flow through the bentonitic shale (p. 25B).

UMC 784.15 - Reclamation Plan: Postmining Land Uses

On page 26A, in combination with pages 16A-F and 17, the applicant provides explanations for the questions regarding UMC 784.15 on page 26, paragraphs 1, 2 and 4. These paragraphs concern wildlife postmining land use, reclamation plans, and portal land use changes, respectively.

Revised pages 48-51a adequately respond to page 26, paragraph 3, supplying reasoning and support for land use changes. The applicant has also provided responses regarding drainage systems. This information provides apparent completeness of this section of the MRP.

UMC 784.16 - Reclamation Plan: Ponds, Impoundments, Banks, Dams & Embankments

In response to DOGM's questions in paragraph 1 on UMC 784.16, Valley Camp indicates 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 will be retained as a permanent structure.

The applicant has supplied the "compliance survey" by Vaughn Hansen Associates, containing calculations and design considerations for ponds 1, 2, and 3. Similar information for pond #4 is contained in the Golder report (Appendix A). This section is apparently complete.

The applicant has acknowledged that design data for Pond #4 was in error and refers to the Golder report for clarification of this point.

The applicant has responded to the comment concerning the mine drainage pond by referring to the reports submitted to DOGM on July 24, 1981, November 17, 1981 and May 17, 1982 concerning proposed revisions of the mine discharge filtering pond. A review of these submittals indicates that the necessary information is provided. This section is judged to be complete.

UMC 784.19 - Underground Development Wastes

UMC 784.19 is generally complete, subject to the approval of the applicant's soil sample proposal by the DOGM. The engineering drawings provided in the Golder Associates report (Appendix A) are accompanied by a letter of certification by a professional engineer (revised page 28A) as requested by DOGM. The remainder of the Golder report adequately addresses the comments in paragraph 1.

The applicant has provided a brief discussion on the potential toxicity of fill material on page 28, paragraphs 2 and 3. However, no substantiation for these comments is provided. This must be provided before this section can be judged complete. Revised page 28 proposes to substantiate the lack of toxicity of these materials by obtaining soil samples from the borrow pit areas, rather than from fill in place, upon approval from the DOGM.

UMC 784.20 - Subsidence Control Plan

The applicant's responses to comments in UMC 784.20 are apparently complete. The applicant has now provided a letter from the U.S. Forest Service regarding surface disturbance resulting from subsidence on forest land, a renewable resource (revised pages 29A-29D). Revised pages 29A-29D verify that subsidence would not cause material damage or diminution of value or reasonably foreseeable use of lands, and provide a description of the measures to be taken to mitigate or minimize such damage or diminution of value if it should occur.

Page 29A indicates the applicant's plans for the angle-of-draw (35°) and intent to modify those plans when necessary; Appendix C, Maps E1-0005 and E2-0006 indicate the applicant's mining plan consideration of subsidence protection for surface structures; and the basis for the self-sealing characteristics may be found on page 7 of the Vaughn Hansen report. These responses are judged to be complete.

The applicant has provided a monitoring plan agreement with the U.S. Forest Service in Appendix H, indicating the applicant's program for determining the extent of subsidence and its effect upon mine design (p. 29A). This satisfies the request made in paragraph 7.

UMC 784.21 - Fish and Wildlife Plan

The applicant's plan is apparently complete in response to the questions regarding UMC 784.21 (p. 30), or UMC 817.97 (p. 16), as the applicant has provided (revised page 88A) a definitive statement of commitment to a wildlife protection plan and a plan of appropriate mitigation measures.

Revised pages 16-16B provide a reference to support the statement on page 87 regarding goshawks and Cooper's hawks, as requested on page 30, paragraph 2.

The applicant also provides a complete response to page 30, paragraph 3, regarding riparian habitat protection (see UMC 817.97, p. 16A).

Pursuant to UMC 784.21(b)(1), the applicant addresses the potential existence within the mine plan area of any state or federal threatened, endangered or sensitive (TES) species (see Appendix I and revised pages 16-16G), along with descriptions of critical habitats, monitoring and management techniques, and impact control measures.

UMC 784.22 - Diversions

Applicant indicates that the 42" culvert has been assessed by Vaughn Hansen Associates as adequate to pass the 100 yr, 6 hr and 24 hr storms. Calculations are available in Vaughn Hansen Associate files, but are not presented in the permit. Procedures used in the calculations, as indicated in the letter, appear technically acceptable.

No post-mining maintenance for the culvert is proposed. Applicant states that the responsibility is removed upon conveyance of the area back to the land owner. This not in compliance with 30 CFR 817.44d, which states that "when permanent diversions are constructed...the operator shall...maintain natural riparian vegetation..."

Applicant states that longitudinal profile for the 42" culvert is not available since it was installed prior to SCMRA regulations. The longitudinal profile for the diversion was not discussed or provided by the applicant.

UMC 784.24 - Transportation Facilities

The applicant has provided all necessary information including specifications for width, grade and surface of the road (p. 32). Drainage and culvert sizing and spacing information was provided in the Vaughn Hansen compliance survey. The information in this report is sufficient to determine apparent completeness of this section.

The applicant has also provided a general description of the proposed conveyor system (Map C, Volume IV and Maps M-1 through M-7, Volume IV).

UMC 784.26 - Air Pollution Control Plan

The applicant's response to comments on UMC 784.26 is apparently complete. Page 33 states that no fugitive dust control measures are employed on coal stockpile. Discussion of plans for dust control and air quality in correspondence with the State of Utah Department of Health (8/17/80) may be found in the section on UMC 783.18 (Climatological Information), pages 14-14C. The applicant has also provided copies of correspondence regarding air quality monitoring waivers (pp. 33A-C); and the applicant states that the Utah State Department of Transportation will determine the paving schedule of Eccles Canyon (p. 33).

UMC 785.19 - Underground Coal Mining Activities on Areas or Adjacent to Areas Including Alluvial Valley Floors in the Arid or Semi-Arid Areas of Utah

The applicant has adequately responded (pp. 34-34A) to the DOGM comments concerning the Alluvial Valley Floor in Pleasant Valley Creek, and therefore, this section of the MRP is apparently complete.

UMC 817.46 - Hydrologic Balance: Sedimentation Ponds

The applicant's response to comments on UMC 817.46 is apparently complete. On page 10, the applicant states intent to submit any plans for proposed future construction for technical review and will evaluate settled sediment material to determine toxicity to formulate reclamation procedures.

UMC 817.47 - Hydrologic Balance: Discharge Structures

The applicant has stated that the emergency spillway of Pond #4 will remain as permanent structure. This completes Section 817.47.

UMC 817.48 - Hydrologic Balance: Acid Forming & Toxic Forming Materials

The applicant has not provided the information necessary to adequately respond to DOGM comments on UMC 817.48. On page 12 the applicant has provided the location of the landfill, and states the lease agreement with the property

owners provides for this use and that specific consent is not required. Since the lease (p. 21, Vol. I) does not specifically include this use, the applicant should provide a written statement from the landowner approving such use.

UMC 817.52 - Hydrologic Balance: Surface & Ground Water Monitoring

The applicant has adequately defined the composite sampling method to be used (p. 9). Water quality at most points has been defined and presented in the Vaughn Hansen Associates report. At those points currently removed from the present mining activity, monitoring will commence one year before the area is impacted by mining activity to delineate baseline conditions (p.9). This response is judged to be complete.

The applicant has adequately described maximum and minimum flow characteristics. The applicant has indicated that no excessive mine discharges have occurred, that effluent violations have been reported and that no emergency flow situations have occurred. The information provided completes this section.

UMC 817.97 - Protection of Fish, Wildlife & Related Environmental Values

The response to UMC 817.97 is not entirely complete. The applicant has not provided a map delineating key wildlife areas as requested by the DOGM, page 16, paragraph 1. Otherwise, the applicant's response to comments in this section is apparently complete.

Appendix I and revised pages 16-16G respond to comments on passerine surveys and references to support the statement on page 86 regarding eagles, and to the request for support for the statement regarding goshawks' and Copper's hawks' ability to withstand considerable human impact (p. 87, Vol. III).

The remaining information requested of the applicant, regarding riparian habitat disturbance and autumn raptor surveys, is provided on pages 16A and 16D-E. Page 16A explains that the riparian habitat involves too small an area to clearly define on a vegetation map; also, the applicant claims "...the mining activities...do not disturb the riparian habitats and...addresses a program to avoid such disturbance...". Pages 16D-E provide the applicant's raptor survey plans and schedules.